

Our response below is structured according to the sections of the SPD. The headings and numbering refer to the numbering within the SPD. At this stage, we have not commented on all Chapters of the SPD but reserve the right to comment in the future.

The National Planning Policy Framework ('NPPF') and Planning Practice Guidance ('PPG') identify that SPDs should build upon and provide more detailed advice or guidance than policies in the adopted Local Plan. They cannot introduce new policies. The PPG states that SPDs should not add unnecessarily to the financial burdens on development.

The SPD does not include a contents page. This should be included in the final version to assist navigation of the document.

3 Policy H1 Housing Mix

The SPD correctly notes that the housing needs identified within the Strategic Housing Market Assessment (SHMA) should be **the starting point** (emphasis added) for establishing a housing mix. It is a guide, not least due to the age of the SHMA (2017, some 6 years old now) and the fact that the mix is a percentage-based figure which applies to the entire CBC area. The needs within a settlement, such as Moggerhanger, will be different to a town such as Leighton Buzzard.

The housing mix identified in table 3.2 is, therefore, a starting point but not a prescriptive target for developments to meet. The text requiring the SHMA mix to be applied should be removed. Policy H1 is clear that proposals should be accompanied by up-to-date evidence on how the application meets identified needs. The SPD must be amended to make it clear that table 3.2 is a CBC wide target, and that each application should instead justify the housing mix proposed based on the latest available evidence. Such evidence is likely to take the form of market information from estate agents, housing registers and similar sources.

Paragraph 3.5.1 must be similarly amended. The paragraph as proposed conflicts with Policy H1 by stating that other evidence is only applicable in "some specific circumstances". H1 is clear that more up-to-date evidence applies, not just in specific circumstances. As drafted, the SPD is not in accordance with the development plan and must be altered.

Similar amendments are required to paragraph 3.10.3. Instead of requiring applications to demonstrate how the housing mix complies with the SHMA, it should require applications to show compliance with Policy H1. The requirement for applications to align with the SHMA is not in accordance with H1, and instead, the requirement identified here (for outline, reserved matters, and full applications) must be for alignment with H1. Any other approach is not consistent with the development plan and would instead be creating new policy, which an SPD is not able to do.

The comments above equally apply to Chapter 6 (and in particular paragraph 6.6.1).

4 Policy H2, Housing Standards

The SPD introduces a new requirement (para 4.1.5) for outline planning applications to demonstrate that all dwellings comply with the Nationally Described Space Standards. This is a new requirement not set out in the development plan, and introducing such a requirement here is akin to creating policy which an SPD cannot do.

Such a requirement is deemed unproportionate and would create unnecessary financial burden upon applicants. It is not fair or reasonable to expect, at the outline stage, applicants to design dwellings to the level of detail that would demonstrate compliance with these space standards. The requirement must be removed.

The requirement in paragraph 4.1.6 for the gross internal floor area to be shown within schedules of accommodation should be made clear that it only applies to RM and full applications, for the same reason. Paragraph 4.1.7 would then be deleted.

The same considerations apply to paragraph 4.3.9 which requires outline applications to demonstrate compliance with M4(2) and M4(3) dwellings. This is unnecessarily onerous at the outline stage and the SPD cannot introduce such a requirement. The wording should similarly be amended to make it clear that it is only needed with RM and full applications. Paragraph 4.5.5 must be deleted for the same reasons.

5 Policy H3, Housing for Older People

Local Plan Policy H3 states that alternative approaches to housing for older people “*can be more suitable having regard to site suitability or viability constraints*”. This is reflected in para 5.3.1 and 5.5.2 of the SPD.

Para 5.5.2 should therefore include reference to allow for higher density in an appropriate, and innovative way on larger schemes. This could reflect site suitability and/or viability and would be an appropriate way to ensure older person housing is delivered, mindful of future needs and evolving ways of living.

Whilst AWG support and encourage 20-minute neighbourhoods, they question why these are promoted in the SPD (Section 5.15). This is a matter for design and would be better included within the Design SPD, rather than the Housing Policy Technical Guidance. Such considerations are wider-ranging than housing policy (e.g. access to services and facilities) and should be removed from this document.

AWG support the approach advocated in paragraph 5.16.2 for an intergenerational housing approach, as set out in their consultation response to the Design SPD.

8 Policy H6, Self-Build & Custom Housing

Like the previous comments, the SPD includes an overly onerous requirement for outline applications in para 8.11.1 which is not appropriate. It states that outline applications will be required to include development principals for self-build/custom housing concerning, inter alia, materials and footprints. These matters are not appropriate for an outline application and should instead be conditioned. The requirement for their inclusion is not set out in policy. In doing so, this is again creating policy. It also adds unnecessary financial burden by requiring further work to be carried out at the earliest stages, without the benefit of planning permission, when there is an entirely appropriate alternative method of securing this information.

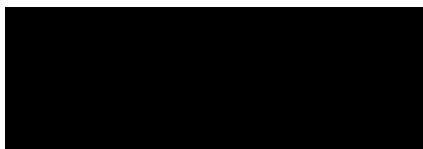
There is no evidence justifying the approach taken in para 8.14.3 for the 12-month marketing period to commence when the plots are available for purchase. It is normal practice for dwellings to be marketed well before they are available for purchase, and the same approach should be taken to the self-build/custom housing plots. The 12-month period should be therefore be capable of commencing when development, within the phase that those plots will be provided, commences.

Conclusion

The SPD attempts to introduce policy which national policy confirms an SPD cannot do. Furthermore, it sets out requirements around housing mix which are not consistent with the development plan.

The SPD must be amended to remove these new requirements and new policy, in line with the comments set out in this document.

Yours faithfully



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