

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

These representations have been prepared by Black Box Planning on behalf of Taylor Wimpey (TW) in respect of the land interests at site G2: Land at Whaddon. TW have majority control over land (130 ha) at Whaddon, with neighbouring promoters L&Q controlling land to the north (previously Hallam Land) and Newland Homes controlling a small proportion of the site fronting Grange Road. All parties have been working jointly in respect of the emerging strategic allocation at Whaddon to ensure a comprehensive approach is taken to the masterplanning and deliverability of the site and associated infrastructure.

Delivery Policy HC3: Self-build and custom-build housing provision

TW object to policy HC3 in so far as the requirement for 2% self-build plots on strategic allocations such as the G2 site at Whaddon is ill-conceived for the following reasons.

TW control the majority of the land at Whaddon (site reference G2). The masterplan proposal for the site makes no provision for self-build plots. It is irrational for land under promotion by a national housebuilder to be required to provide self-build plots as the cost of a serviced plot will likely be prohibitive for the self-build market in order to meet the expectations and/or contractual requirements with the landowner in terms of minimum price per acre.

Policy HC3 stipulates the 2% requirement for self-build or custom-build plots is in addition to affordable housing provision. This requirement is inconsistent with NPPF (2021) paragraph 65 which exempts self-build development schemes from the minimum requirement of 10% affordable housing. Essentially, national policy recognises the reality that self-build development schemes by their nature cannot be expected to deliver affordable housing, yet the expectation of policy HC3 is that strategic sites will deliver 30% affordable housing and 2% self-build or custom build plots.

In addition, there is no evidence to support the market demand for self-build plots with an otherwise planned strategic residential development, the character and appearance of which is informed by detailed masterplanning, design statement and in the case of the Whaddon site, the development brief as required by proposed policy G2. The motivation for self-builders is to create a bespoke dwelling which delivers an individual design vision on an individual building plot. The development brief for Whaddon will place certain parameters on the design vernacular across the site and therefore present undesirable limitations for self-builders.

It is therefore unlikely that self-build plots will be commercially viable within strategic residential development schemes such as the proposed Whaddon development.

TW incorporate an element of customisation to individual homes which provides new homeowners to ability to make individual choices on internal and a limited number of external finishes. In that context, the policy HC3 requirement for 2% custom build will be satisfied. It is questionable however whether this is satisfactory in addressing the Government objective for those wishing to commission their own homes.

The Government promotion for custom self-build is related to significantly boosting the supply of housing with policy encouragement for as many forms of house building as possible (i.e. in a similar manner to the promotion of smaller sites, NPPF paragraph 68). By simply transferring the self-build provision to strategic sites, Policy HC3 will not have the intended objective of boosting housing supply. On the contrary, it will sterilise land within strategic allocations which should be made available for standard forms of housebuilding (market and affordable). NPPF paragraph 72 recognised that the supply of large numbers of new homes can often be best achieved through planning for larger scale development. In the case of the allocation at Whaddon, a policy requirement for 2% self-build or custom build plots will only hinder housing delivery on the site.

Policy HC3 as drafted is therefore unsound and should be revisited.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy HC3 should be modified to delete the requirement for strategic sites to deliver 2% self or custom build on strategic sites. The SLP should seek to allocate sites specifically for self-build plots with allocation policies for such sites confirming no requirement for affordable housing provision on such sites in accordance with NPPF paragraph 64.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

TW control a majority proportion of the strategic site 'G2' Land at Whaddon. On behalf of TW, Black Box Planning request attendance at the hearing sessions to assist the Inspector with any queries or discussions regarding the site at Whaddon and to partake in general discussions regarding policy HC3.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:

