

Main Matter 6 – Whether or not the proposed housing allocations are soundly based and deliverable, whether other housing policies are soundly based and whether a 5 year supply of land can be provide on adoption and throughout the plan period.

8) Is the provision in Policy H5 for at least 5% of dwelling plots on sites of more than 100 dwellings to be provided for self-build or custom build homes appropriate and what evidence justifies the threshold for 100 dwellings? What evidence is available to demonstrate the level of interest in these types of dwellings?

We **object** to the requirement for at least 5% of dwelling plots on sites of more than 100 dwellings to be provided for self-build or custom build homes, as set out in Policy H5. As set out in our previous representations to the publication version of the plan, we object on the grounds of this being an onerous requirement, and not justified as set out in paragraph 182 of the NPPF (2012). We note that paragraph 159 of NPPF (2012) states that the needs of people wishing to build their home should be considered when assessing housing need.

As a way to assess the extent of need for sites for self and custom build homes, Mansfield, Ashfield & Newark and Sherwood District Council's run a combined self-build register to collate data on interested parties. Although this may provide a reasonable estimation of the need for such housing, it is not clear whether a 5% requirement on sites of more than 100 dwellings has been informed by this evidence base. As set out in the NPPG, this requirement should be supported by additional data from secondary sources to appreciate the level of need for this type of housing (ID 57-0011-20160401). In the case of the emerging Broxtowe Local Plan Part 2, a similar requirement for sites of 20 dwellings or more to provide 5% custom and self build sites was removed by the Councilⁱ. Furthermore the Borough Council's reliance on a self build register as evidencing sufficient demand for this type of housing was rejected. The provision of such plots should be left to the discretion of the developer and based on market trends, which could change over the plan period.

In the case of development site H1d), the policy would lead to 10 self-build or custom build plots being made available. This would lead to 10 separate construction sites delivering at different time, which depending on the type of housing required may require separate permissions and/or amendments than the overall site, potentially leading to complications with delivery and management of a joined up design and character to the development.

We note that the policy wording includes reference to self-build plots being able to be made available for market housing after a 12 month period of advertising. We consider this an onerous requirement, especially if a register of interested parties already exists. We reassert our comments submitted in the publication plan consultation that the wording of Policy H5 should be amended to include: "any of these plots which are not sold on that basis after a period of **6 months** advertising may be used for general market housing." We consider this to be a more appropriate timeframe, to ensure that the delivery of housing is not slowed due to the requirement for 12 months of advertising. These proposed changes would ensure that the policy is effective, ensuring it is deliverable over the plan period, as set out in paragraph 192 of NPPF (2012).

ⁱ Inspector's Post Hearing Advice Note – INSP/08 (18th March 2019)