



West Northamptonshire Council

West Northamptonshire Council is preparing a new Local Plan for the area to guide development up to 2043. The West Northamptonshire Local Plan will replace the West Northamptonshire Joint Core Strategy Local Plan (Part 1) and the Part 2 Local Plans which were adopted for the former Daventry, Northampton and South Northamptonshire areas.

The consultation period commences on 29 January 2026 and will run for a period of 8 weeks until 27 March 2026

If you have any comments to make, please use the form below:

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Please tick the box should you wish to be kept informed at all key stages in the process of producing the new Local Plan	Yes please
Date	27/03/26

Scan here to have your say on West Northamptonshire's new draft Local Plan

Planning Policy – Draft Local Plan
West Northamptonshire Council
One Angel Square
Northampton
NN1 1ED



Email: Planningpolicyconsultation@westnorthants.gov.uk

Please refer to relevant paragraph and/or Policy number(s) as appropriate

See attached letter

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SENT BY EMAIL

27th March 2026

Dear Sir/ Madam

Response by the Home Builders Federation to the West Northamptonshire Reg 18 consultation, March 2026

1. Please find below the Home Builders Federation (HBF) response to the West Northamptonshire Local Plan (Reg 18) consultation.
2. HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. In any one year, our members account for over 80% of all new “for sale” market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. HBF welcomes the Council’s efforts to ensure that they have an up to date Local Plan. Plan-making is a fundamental part of a Local Authority’s role and is essential to support the delivery new homes and jobs. However, we are very concerned about the consequences of the Council’s intention to fail to meet the standard method housing requirement for the Torbay area. Government policy has clearly set out the for a significant increase in house building in order to deliver the 1.5 million new homes in this Parliament.

Impacts of removal of the legal requirement of Duty to Cooperate

4. As you will be aware the Government has not saved the Duty to Cooperate (DTC) as a legal requirement for the production of new Local Plans. However, there is clearly still an expectation that Councils will work together on effective plan-making and there remains a clear expectation that the housing needs of an area will still be met in full. Therefore, although compliance with DTC is no longer a legal compliance it is still part of the tests of soundness for the Plan.

Impact of the end of Supplementary Planning Documents

5. It is not appropriate for the Local Plan to include reference to other documents, including Supplementary Planning Documents, within policy as this would seek to give them Local Plan policy status. HBF also note that it will not be possible for Council’s to adopt new post June 2026. The Council will need to consider the implications of this.

Impacts of the Dec 2025 NPPF consultation

6. As you will be aware the Government published its long-awaited proposed revisions to the NPPF for consultation on 16th Dec 2025. Whilst this is clearly still consultation it clearly sets out the expectations and direction of travel of the Government. The new NPPF clearly shows the importance that is being placed on addressing the housing crisis and the clear move towards a more rules-based planning system that provides more certainty for everyone. It is very clear that the Government is expecting Local Plan to do more to help to address the housing crisis and there is a clear expectation that all Councils should be planning to meet their housing needs in full.
7. HBF also notes the Government's intention to move towards a new more rules-based approach with consistency across standard common matters being provided at the national level. The Dec 2025 NPPF consultation sets out that Local Plans should not include policies on matters already addressed through Building Regulations and other regulatory regimes except when it comes to parking standards and the percentage of homes locally required to meet the accessibility standards M4(3)a and M4(3)b.
8. HBF would therefore strongly encourage the Council to fully consider the scope and content of this Plan. The proposals clearly set out that the Government view is that Local Policies which conflict with the new NPPF will not be able to be taken into account in decision-making. Committing to the development of a suite of Development Management policies that will be replaced and made redundant by the new NPPF may not be the best way to proceed, especially in a time of scarce resources.

Chapter 2: Spatial Portrait, Vision and Objectives

9. HBF would request that the vision for West Northamptonshire is more explicit about its ambitions to meet the housing needs in full. This should also be an objective of the Plan.
10. This section may need revisiting to reflect the refocusing of Local Plan on site allocations and matters of local interest, and not reframing or adding to matters already adequately addressed in national policy. HBF would support the aim of ensuring housing needs are met in full as both an objective and a priority for this Plan.

Chapter 3: A Spatial Strategy for West Northamptonshire

11. HBF note that a sustainability appraisal was undertaken of the following eight broad spatial options:
 - Option 1 – Northampton Focus
 - Option 2 – Northampton Fringes with Northern Relief Road
 - Option 3 – Urban Regeneration
 - Option 4 – Larger Towns and Primary Service Villages (existing strategy)
 - Option 5 – Major New Settlement

- Option 6 – Sustainable Transport Corridor
- Option 7 – Larger Towns, Primary and Secondary Service Villages (wider dispersal)
- Option 8 – Employment as a focus for growth

12. We are unclear if these options have been subject to testing as to whether a higher housing number could be delivered across West Northamptonshire. In light of the current housing crisis HBF would suggest the Council should consider if it could be doing more to help address the housing crisis and whether or not a higher housing requirement is needed in order to deliver affordable homes, support economic growth and to support small and medium house builders.

Policy S1 – Spatial strategy (distribution of development)

13. It will also be important for the plan to set out a clear settlement hierarchy. We note that at present reference is made to the Principal Urban Area of Northampton, the Sub Regional Centre of Daventry, and the Rural Service Centres of Brackley and Towcester. However, this appears to leave a significant gap in the hierarchy in relation to development within the rural area.

14. In order to support sustainable rural development the Plan should set out locations which outside of the PUA, Sub-Regional Centre and Rural Service Centres that would be appropriate for new development, including new homes. New housing in rural area can play a vital role in helping to support existing facilities. Therefore the Plan will need to consider the issue of supporting sustainable rural development. HBF would suggest that this should include the allocation of sites for new homes within the rural areas in village locations.

15. When considering the sustainability of villages for new housing, the Plan should also recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village. We note that the provision of additional housing sites in villages can play a very important role in helping to support rural development. We would therefore question whether Criterion E is adequate or appropriate to address housing needs across Wets Northamptonshire including within the more rural areas of the District or to support sustainable rural development.

Chapter 4: Placemaking

Policy PL1 – Sustainable design and construction

16. You will be aware that the Government has now published the Future Homes Standard, including transitional arrangements on 23rd March 2026. It will be important for the Plan to fully consider and reflect the implications of both the FHS

itself and the timetable for the introduction of this standard on any policies in this Plan.

17. HBF are concerned about the ever increasing and overly burdensome nature of Local Plan policies which are seeking to go above and beyond Building Regulations and the FHS. There is no need for Local Plans to address these matters in policy, when they are already fully addressed through a different mandatory regulatory regime.
18. HBF do not support Local Plan policies on matters that are already addressed by Building Regulations and other regulatory regimes. A plethora of local standards can actually undermine the objectives the Council is seeking to achieve, for example by seeking to introduce uncertainty and variability to the timetable for the introduction of the national Future Homes Standard and changes to Building Regulations.

Policy PL5 – Flood risk and surface water management

19. The Council needs to be mindful of the recent national government planning advice on flooding and flood risk. The Plan will also need to fully consider the implications of updated SUDS requirements on viability and deliverability. The new requirements are impacting on the amount of a site area for SUDs with consequential impacts on developed areas, housing numbers and densities.

Policy PL6 – Placemaking, design and amenity

20. It is not appropriate for the Plan to seek to give Local Plan policy states to other documents such as the local validation checklist, or SPDs. Any reference to such documents such only be in the supporting text and not within the policy.
21. It is unnecessary and unhelpful to repeat national policy within Local Plan policy especially as will change over the lifetime of the Plan.
22. HBF would also highlight the need for the Plan to fully consider the implications of all the policies in the proposed Plan as well as other regulatory requirements in the round. For example, the new Future Homes Standard, the national mandatory requirement for 10% Biodiversity Net Gain (BNG) and the requirement for this to be on-site wherever possible. Taken together the policies in the Plan will impact of the viability and deliverability of sites. The Council should also be mindful of the potential tensions between different policies for example between BNG, open space and public access or the impacts of alignments requirements for solar energy on design.

**Chapter 5: Making Great Places – Northampton, and
Chapter 6: Making Great Places – Daventry, and
Chapter 7: Making Great Places – Brackley, and
Chapter 8: Making Great Places- Towcester, and**

23. Although HBF do not comment on individual sites we would expect the Plan to set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The Plan will need to provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. It will be important to ensure enough sites are allocated to meet housing needs in full and to ensure a range of sites will deliver the full range of housing types required.
24. The Council should also set out in the Plan's policies and evidence base to set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by the current NPPF. Indeed, HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%.
25. We would also highlight the Dec 2025 NPPF consultation is looking to extend this requirement to medium sites, and is more explicit that it intends that this national policy requirement to be delivered through allocations (not windfalls or any other means). HBF would encourage the Council to fully consider the implications of this clear direction from Government on the policies and site allocations in this Plan.
26. HBF note that support for small and medium builders need not be limited to only small sites of less than 1Ha. SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of a range of sites including non-strategic allocations could be used to expand the range of choice in the market and be of a scale that can come forward and make a contribution to housing numbers earlier in the plan period. We would encourage the Council to give greater consideration to the range and mix of allocations being provided in Northampton, Daventry, Brackley and Towcester.

Chapter 10: Making Great Places- Rural Areas

27. Again, although HBF does not comment on individual sites we would expect the Plan to set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The Plan will need to provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. We are therefore concerned that this Plan is not adequately considering the issue of housing needs in rural areas.
28. We are concerned about the approach being proposed in the suite of policies in this Chapter. The Plan should set out a vision for growth within the rural areas including housing allocations. Failure to do so will not result in the range and choice of sites

required, needed to ensure housing needs are met in full, and is not doing enough to support SME builders.

29. Although the Plan indicates it has identified a settlement hierarchy for the villages of Primary Service villages, Secondary Villages, Other Villages, Small Settlements and Hamlets, and then rural areas (although small settlements and hamlets are in fact treated as open countryside), no housing allocations are proposed in any of these five different categories, only rural exemption sites and community led housing schemes.
30. In order to be effective and justified HBF suggest that the settlement hierarchy for the whole of West Northamptonshire should be set out in a single policy, and this should then link through to proportionate housing allocations. As currently written the Plan is not considering or addressing the issue of the need for sustainable rural development, even though it has identified a hierarchy of rural settlements. The West Northamptonshire Plan has to be a plan for the whole of West Northamptonshire, not merely a plan for the four main Settlements. Delegating the delivery of 3,832 homes within the Plan to a future documents, be that a voluntary Neighbourhood Plans or another Development Plan document that we be prepared by the Council if work on Neighbourhood has not so, a decision that will be taken in 2 years, is simply not an appropriate. It is not justified and would not be an effective way to address the housing needs of rural West Northamptonshire.
31. It is also unclear from the policies in this Chapter how developments applications from BNG Habitat Banks for elements which require planning permission, such as ponds, or access paths, would be assessed in any of the five tiers of rural locations identified.

Policy R1 – Primary Service Villages

32. This policy acknowledges that “the Primary Service Villages perform a crucial role in helping to provide an important range of services and facilities and access to employment opportunities to meet the day to day needs of the local communities they serve”. This in itself should be justification for the Plan to properly consider housing supply in rural areas and the role that housing allocations in rural areas can and should play within this Plan. Allocations provide certainty for both developers and communities. HBF suggest that the Council needs to revisit its policy in relation not providing for any housing allocations in these locations.

Policy R2 – Secondary Service Villages

33. Similarly this policy says “the Secondary Service Villages perform an important role in helping to provide some services and facilities for the local communities which they serve.” As with Primary Rural Villages, the Plan should consider the role that housing in these locations can play in delivering sustainable rural development. Allocations provide certainty for both developers and communities. HBF suggest that

the Council needs to revisit its policy to consider if in relation not providing for any housing allocations in these locations.

Policy R3 – Other Villages

34. This policy states that “Other Villages perform a predominantly local role in providing a limited number of services and facilities for their residents.” This would still suggest that some limited small scale housing may be appropriate in these locations.

Policy R4 – Small Settlements/Hamlets

35. It is also unclear why this distinction policy is needed if small settlement and hamlets are treated as countryside. As currently worded this is confusing, and as we have already suggested a single settlement hierarchy policy is needed for the Plan to be effective.

Policy R5 – Open Countryside

36. It is unclear from the wording of this policy what ‘Development that otherwise accords with the Rural Settlement Hierarchy’ means

Policy R6 – Rural areas housing requirements

37. It appears that the Council is attempting to delegate the planning for housing in rural areas to Neighbourhood Plans. HBF do not believe this is an appropriate approach for the Council to adopt in relation to its rural area. The delivery of 3,832 homes within the Plan to a future documents, be that a voluntary Neighbourhood Plans or another Development Plan document that we be prepared by the Council if work on Neighbourhood has not so, a decision that will be taken in 2 years, is simply not an appropriate. It is not justified and would not be an effective way to address the housing needs of rural West Northamptonshire. Due to the uncertainty of their delivery, if this approach was continued such sites should not form part of the five-year Housing Land Supply. HBF request a full rethink of planning for rural West Northamptonshire is needed.

Chapter 11: Homes

Policy HO1 – Housing requirement

38. Criterion A sets out that ‘the housing requirement for West Northamptonshire for the plan period 2025 to 2043 is 45,054 homes’ and that ‘in addition to this requirement this plan will provide for an additional 5% to ensure choice and competition in the market for land.’
39. HBF note that the housing requirement figure should be expressed as both a total figure and an annual requirement, which is essential for monitoring. The figure will also need to be kept up to date as new data, for example on the affordability ratio becomes available.

40. The standard method is intended to arrive at a minimum figure. As we have said earlier we would encourage the Council to consider if there are any reasons that would justify a higher housing requirement. The Sustainability Appraisal should also consider the impacts of different levels of growth.
41. We would also encourage the Council to fully consider the appropriate plan period plan. NPPF states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
42. In recognition of the time that it can take to progress a new Local Plan through all its required stages, including examination and adoption, HBF suggests that the Council should consider extending the Plan period to ensure that a 15-year period is provided post adoption of the Plan. It will also be important for the evidence base to be consistent with the Plan Period.
43. In relation to part B of the policy, HBF note that the Plan will need to include a clear, robust and realistic housing trajectory which demonstrates a sufficient supply of new homes over the plan period, and for the Council to demonstrate that it can achieve and maintain a five year supply of deliverable housing land across the lifetime of the Local Plan.
44. It will be important for the Plan to demonstrate that any existing commitments being rolled forward and any new allocations are viable and deliverable. We would encourage the Council to work directly with land promoters and developers on this issue.
45. The Council should also set out in the Plan's policies and evidence base to set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by the current NPPF. Indeed, HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%.
46. HBF note that support for small and medium builders need not be limited to only small sites of less than 1Ha. SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of a range of sites including non-strategic allocations could be used to expand the range of choice in the market and be of a scale that can come forward and make a contribution to housing numbers earlier in the plan period.

47. As we have said, we are also concerned about the reliance being placed on Neighbourhood Plans to deliver the Local Plan housing requirements especially as this is a voluntary exercise.

Policy HO2 – Affordable housing

48. Criterion A states that “the Council will expect 40% of the total number of dwellings to be delivered on individual sites of 10 or more dwellings to be affordable.”
49. HBF note that Viability is an important consideration. We would welcome the opportunity to review and comment on the Whole Plan Viability Assessment that is being prepared as part of the Plan preparation, once it is available.
50. Whole Plan viability testing is an important part of the plan-making process. However, as noted in PPG assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Flexibility should be included within this policy because whole plan viability assessments use methodologies that test typologies of sites, which do not consider the detailed circumstances of individual sites. As such there may be individual sites that are already not viable, for example if the costs or values of a specific site fall outside the parameters used of a typology that was tested. Some sites will be on the very margins of viability and other sites may already be unviable even without a change of circumstances. Therefore, the policy needs flexibility to ensure it is justified and effective, and the Plan is deliverable.

Policy HO6 – Mixed communities

51. It will be important for the mix and type of housing sought to be informed by up to date evidence. HBF also draw the Council’s attention to the draft NPPF Dec 2025 suggestion that the type of market housing being sought should not be constrained by Local Plan policies.

Policy HO7 – Standards for accessibility, space and water efficiency in new homes

52. HBF does not consider that the Council setting its own standards, or timetable for matters best addressed nationally. We are concerned about Councils adding to the complexity of policy, regulations and standards that housebuilders are already expected to comply with. The key to success is standardisation and avoidance of individual Councils specifying their own policy approach, which undermines economies of scale for product manufacturers, suppliers and developers.
53. This policy will need to be reviewed in light of the Future Homes Standard that has just been published. This illustrates why HBF do not support Local Plan policies on matters that are already addressed by Building Regulations and other regulatory regimes. A plethora of local standards can actually undermine the objectives the

Council is seeking to achieve, for example by seeking to introduce uncertainty and variability to the timetable for the introduction of the national Future Homes Standard.

54. The policy seeks to apply the optional nationally described space standards (NDSS) to all residential developments on sites of 10 dwellings or more. This should only be done in accordance with the NPPF, which states that “*policies may also make use of the NDSS where the need for an internal space standard can be justified*”. As set out in the NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.
55. PPG (ID: 56-020-20150327) identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:
- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
 - **Viability** – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
 - **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.
56. The Council needs robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF has been unable to locate this evidence within the Local Plan supporting documentation or the Local Plan itself. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.
57. HBF would remind the Council that there is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The Council’s policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provide a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing.
58. An inflexible policy approach imposing NDSS removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.
59. If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning

residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date.

60. Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. PPG states that where there is a 'clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day'.
61. The PPG also states the 'it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement'.
62. The HBF also notes that many home builders are frequently delivering 115-110 litres per day which means the house building industry is already improving upon the regulations, and is doing so in a deliverable and viable manner. There is no need for Local Plan policies to repeat Building Regulations and it is in fact unhelpful to do so as Building Regulations may change during the course of the plan period.
63. The policy seeks to require all new development to meet the Nationally Described Space Standards (NDSS). HBF note that the NDSS as introduced by Government, are intended to be optional and can only be introduced where there is a clear need, and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.
64. The PPG identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas: Need, Viability and Timing. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.
65. HBF notes that there is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The HBF recommends that the policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provided a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. The

introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.

66. HBF also notes the Government's intention to move towards a new more rules-based approach with consistency across standard common matters being provided at the national level. The Dec 2025 NPPF consultation sets out that Local Plans should not include policies on matters already addressed through Building Regulations and other regulatory regimes except when it comes to parking standards and the percentage of homes locally required to meet the accessibility standards M4(3)a and M4(3)b. HBF would therefore strongly encourage the Council to fully consider the scope and content of this policy. The Dec 2025 draft NPPF proposals clearly set out that the Government view is that Local Policies which conflict with the new NPPF will not be able to be taken into account in decision-making.

Policy HO8 – Self-build and custom build homes

67. In general, the HBF does not consider that requiring major developments to provide for self-builders is appropriate. Instead, the HBF advocates for self and custom-build policies that encourage self and custom-build development by setting out where it will be supported in principle. The HBF considers that Councils can play a key role in facilitating the provision of land as set in the PPG. This could be done, for example, by using the Councils' own land for such purposes and/or allocating sites specifically for self and custom-build home builders- although this would need to be done through discussion and negotiation with landowners.
68. It is considered unlikely that the provision of self and custom build plots on new housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity.
69. If the policy is retained the policy must be realistic to ensure that where self and custom build plots are provided, they are delivered and do not remain unsold. If demand for plots is not realised, there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the market and Council's Housing Land Supply. Therefore if the policy remains, it needs to be clear what happened where plots are not sold. Any unsold plots should revert to the developer after a certain period of time, we suggest this should be six months or less.

Chapter 13: Built and Natural Environment

Policy BN9 – Nature conservation

70. It is not appropriate to include reference to SPD within the policy as this would seek to give it Local Plan policy status. Care should also be taken to avoid any confusion behind policies on Biodiversity which are about species, and Biodiversity Net Gain (BNG) which is about habitats.

Policy BN10 – Biodiversity Net Gain

71. HBF was involved in a significant amount of work, being led by the Future Homes Hub, on BNG preparedness, including feeding into the BNG Planning Practice Guidance and the DEFRA BNG Guidance, and continue to be involved in this work through sitting on the FHH BNG Implementation Board. This group seeks to ensure that BNG can deliver the win for nature and the win for housing as intended, by identifying challenges in the implementation of this policy and trying to find solution to them. HBF recognises the role that development can play in helping to support nature recovery. However, it is also important BNG delivers the win-win intended and does not become a barrier to housing delivery.
72. Experience has found that delivering the 10% BNG requirements can be very challenging in some cases, particularly on brownfield sites where open mosaic habitat is present, and on some of the smallest sites where on-site BNG provision requires a disproportionate amount of the developable area to be used for BNG. As 10% BNG is mandatory, where viability challenges are encountered then it is usually affordable housing that it reduced to accommodate this.
73. The Government (via DEFRA) recently undertook a consultation on potential revisions to the national BNG requirement and is now intending that sites under 0.2 Ha are exempt from BNG. Further work on other possible improvements to the working of the policy in practice are ongoing and it will be important that the Plan's policy on this issue is kept under review.
74. The recent NPPF (Dec 2025) consultation indicates that the only time where it may be appropriate to seek more than 10% BNG through local policy relates to allocations, and even then only where this is clearly evidenced and justified. BNG implementation is an area of work being led by DEFRA and is required under the Environment Act. As such changes to how BNG is operationalised will need to be fully considered in the Local Plan. and reflected in the West Northamptonshire Local Plan
75. In order for the Plan to be sound it must comply with the Environment Act and DEFRA Guidance. This is separate from and in addition to MHCLG advice and the NPPF. Care is therefore needed to ensure that any policy on Biodiversity Net Gain policy complies with the latest policy and guidance on adoption, and it is noted that much of the DEFRA guidance and legislation is currently under review.
76. It should also be noted that the PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance, and that additional advice on phased development has been provided in the BNG PPG For large and complex sites where the development is phased, the guidance is clear that the 10% must be delivered at the end of the development, and this may not result in 10% BNG on each phase.

77. Again, HBF also note the significant potential for confusion around environmental hierarchy, and suggest particular care is needed to avoid any confusion between the well-established mitigation hierarchy and the new BNG hierarchy. There is need for the policy wording and/or supporting text to be clearer about the differentiation between the mitigation hierarchy (which seeks to avoid harm in the first place, then mitigate and only then compensate it in relation to protected habitats) and the BNG hierarchy (which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits). There seems to be significant potential for confusion between the two difference hierarchies. HBF therefore suggest that the West Northamptonshire Plan should do all it can to explain how the two hierarchies work in different ways and that they seek to achieve different aims. We would suggest the use of the term “BNG spatial hierarchy” may help with this issue.
78. As highlighted earlier HBF would question the range and scope of this Chapter especially in light of the proposed new approach to Local Plan content set out in the current Dec 2025 NPPF consultation. It will be important for this suite of policies to be fully evidenced and justified and do not repeat national policy. The Plan will also need to be clear how all the natural environment policies are intended to work together. For example, how does the requirement for the 10% national mandatory Biodiversity Net Gain for work with the other proposed policies on protecting trees and hedgerows and woodland. Similarly, how does mandatory BNG work with the policies on Blue and Green Infrastructure?

Chapter 15: Infrastructure

Viability

79. As we have said earlier, robust viability testing of proposed policies in combination will be an essential part of the Plan. It is essential the evidence shows that the Plan is both viable and deliverable.

Chapter 16: Implementation and Monitoring Framework

80. HBF agree that the Monitoring Framework should be an integral part of the Plan. Monitoring is an essential, yet often neglected part of the Plan, Monitor, Manage approach. We suggest this Plan should include a Review policy. This policy should includes clear timeframes and triggers, however it must also be noted that preparing a new plan, does in fact nothing in the short or medium term to address the under-delivery of housing. HBF therefore request that the Plan and monitoring framework should include actions to be taken if the targets are not met. For example, working with developers to help bring any stalled forward, considering applying flexibility in relation to some other policy requirement(s) if there are deliverability issues, permitting departure sites, and such like.

Future Engagement

81. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in blue ink that reads "R. H. Danemann". The signature is written in a cursive style and is centered within a light blue rectangular background.

Rachel Danemann MRTPI CIHCM AssocRICS

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