



Local Plans Department
Corby Borough Council
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SENT BY E-MAIL AND POST

20 December 2016

Dear Sir / Madam

CORBYP LOCAL PLAN PART 2 SCOPING CONSULTATION – ISSUES & OPTIONS

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. 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. We would like to submit the following representations in response to specific questions set out in the consultation documentation.

Q30. Should additional housing sites be identified and if so how much?

The Council's evidence identifies a total Housing Land Supply (HLS) of 12,355 dwellings against its adopted housing requirement of 9,200 dwellings. However the adopted Joint Core Strategy (JCS) also includes the strategic opportunity for Corby of 14,200 dwellings and a commitment to identifying additional land if Sustainable Urban Extensions (SUEs) are not delivered fast enough to maintain 5 Years Housing Land Supply (YHLS) and a partial review of the JCS if SUEs deliver less than 75% of projected completions in three consecutive years. An early review of the JCS is not the optimum mechanism by which to resolve unmet housing need at the point when it occurs because of the slow response time of such reviews. Therefore the HBF agree that the Council should identify additional housing sites together with a policy mechanism for the release of developable reserve sites. The release of reserve sites provides flexibility to respond quickly to changing circumstances in order to meet identified housing needs. The Council should identify

sufficient additional housing sites to deliver the strategic opportunity plus 20% buffer without doing so the Council is unlikely to succeed. This approach coincides with the recommendations of the Local Plans Expert Group (LPEG) Report which proposes that *“the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF”* (para 11.4 of the LPEG Report).

When allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets including multiple outlets on SUEs. Thereby maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand.

Q32(a). Which of the options do you think provides the best approach to supporting sustainable rural development?

Option B provides the best approach to supporting sustainable rural development. Therefore the Council should undertake further work on assessing local needs.

Q33(a). Do you have any comments on the suggested options?

Option A is the most appropriate approach. Policy 9 of the JCS and Building Regulations deal with sustainable buildings there is no requirement for a local policy.

Q34(a). Which of the options do you think provides the best approach to supporting self build and custom house building?

Option A is the most appropriate approach. There is no requirement for a local policy on self build and custom build which is dealt with by both the NPPF and JCS's encouragement on a site by site basis.

Q35. Do we need to identify sites or develop further local guidance?

The HBF agreed that until further information on Starter Homes is available from Government it is not clear whether a local policy beyond that contained in the JCS is necessary.

Q36(a). Do you have any comments on the suggested options?

The HBF agree that Option A is the most appropriate approach. The JCS makes provision for M4(2) accessible / adaptable homes and the nationally

described space standard. There is no justification for a local policy on M4(3) wheelchair accessible housing.

Conclusions

For the Corby Local Plan Part 2 to be found sound under the four tests of soundness as defined by the NPPF (para 182), the Plan must be positively prepared, justified, effective and compliant with national policy. The Council should consider the above mentioned responses in order to avoid preparing a Plan which is unsound. It is hoped that these comments are helpful to the Council in informing the next stages of the Corby Local Plan Part 2. In the meantime if any further assistance or information is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
Planning Manager – Local Plans