

Planning Policy
Borough Council of Wellingborough
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SENT BY E-MAIL ONLY TO
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Dear Sir / Madam

WELLINGBOROUGH LOCAL PLAN PART 2 – MAIN MODIFICATIONS CONSULTATION

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 to two specific main modifications set out in the above mentioned consultation namely :-

- **MM8** to paragraph 7.4.19 which states

"In order to ensure a variety of sites are available for self build and custom build, the council will seek the provision of a proportion of serviced the plots on sites of 50 dwellings or more or 1.4 ha or more site area that come forward either as allocations in the plan or as windfall sites to make provision for self build and custom build plots. These There are a variety of ways of delivering these plots and this should be discussed and agreed with the Council, different approaches will suit different sites and developers. Serviced building plots for self build should be offered for sale on the open market. The Council will also notify those on the register of their availability of self build and custom build plots. Plots could be covered by Design Codes on larger sites. Serviced Sites plots which have been appropriately marketed at prevailing market value and which have not been sold after 12 months could be built out by the developer. In determining the appropriate level and type of self build and custom build the council will have regard to evidence of need, the nature of the development and



the viability of the development. Schemes solely for flats or apartments will not be expected to make any provision towards self build or custom build plots.”

- **MM9 to Policy H9 – Self Build and Custom Housebuilding** which states

“On sites of 50 or more dwellings or 1.4 ha or more site area, the local planning authority will seek the provision of 5% of the plots ~~should~~ to be made available for sale as serviced building plots as self build or custom build plots. The provision will take account of ;

- The evidence of local need ;
- The nature of the development proposed ; and
- The viability of the development.

Serviced building plots which have been appropriately marketed at a prevailing market value and which have not been sold after 12 months can be built out by the developer.”

The HBF is supportive of proposals to encourage self / custom build for its potential additional contribution to the overall housing supply. It is noted that policies which encourage self / custom build have been endorsed in a number of recently published Inspector’s Final Reports for East Devon Local Plan, Warwick Local Plan, Bath & North East Somerset Place-making Plan and Derbyshire Dales Local Plan. Furthermore **Policy 30** of the adopted North Northamptonshire Joint Core Strategy (NNJCS) provides encouragement for self / custom build and requires a percentage of such plots on Sustainable Urban Extensions (SUE).

However the HBF is not supportive of restrictive policy requirements for the inclusion of such housing on residential development sites of 50+ dwellings as proposed by the Council. This approach only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply.

If the Council wishes to promote self / custom build it should do so on the basis of evidence of need. The Council should assess such housing needs in its SHMA work as set out in the NPPG (ID 2a-021) collating from reliable local information (including the number of validated registrations on the Council’s Self / Custom Build Register) the demand from people wishing to build their own homes. Any policy requirement for self / custom build plots on residential development sites should be fully justified and supported by evidence. The Council’s evidence set out in Document M4-2-BCW Self Build and Custom Build Note identifies 39 entries on the Council’s Self Build Register of which 28 indicate a preference for individual serviced plots. Of the 28 entries indicating a preference for an individual self build plot it is not known if the demand is for a single “stand alone” self build plot or as part of a mainstream housing development. There is no evidence from the Council which points to a specific demand for self / custom build plots on housing sites of 50+ dwellings. Therefore there must be considerable uncertainty as to whether plots on new housing estates would be attractive to self / custom builders.

Before introducing any such policy the Council should give consideration to the practicalities of health & safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. The NPPG confirms that *“different types of residential development such as those wanting to build their own homes ... are funded and delivered in different ways. This should be reflected in viability assessments”* (ID 10-009). The Council should also consider the impact of no Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt.

MM9 to **Policy H9** and **MM8** to its supporting text are unsound because there is no evidential basis to justify the requirement which will be difficult to implement due to insufficient guidance for applicants and decision takers. The policy causes unnecessary uncertainty so it will be ineffective. The HBF recommends that **Policy H9** and paragraph 7.4.19 are deleted.

If **Policy H9** is retained then the HBF recommends that the marketing period is reduced to 6 months rather than 12 months. There are significant logistic problems for conventional housebuilders returning to site (after 12 months) to build out plots which have not been sold to self / custom builders. A shortened marketing period may allow conventional builders to build out unsold self / custom build plots at the end of a site’s building programme before the development is completed.

It is also noted that there are inconsistencies between **Policy H9** and paragraph 7.4.19 any references to “serviced” plots should be removed from the supporting text in order to align with the wording of the policy as set out in **MM9**.

Conclusions

For the Wellingborough 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. **MM8** and **MM9** are unsound and therefore should be deleted. It is hoped that these comments are helpful to the Council and the Inspector in informing the final stage of the Wellingborough 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