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Dear Sir / Madam

## **CORBY LOCAL PLAN PART 2 – DRAFT OPTIONS 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.

The North Northamptonshire Joint Core Strategy (NNJCS) for Corby, East Northamptonshire, Kettering and Wellingborough Councils adopted in July 2016 sets out :-

- the overall spatial strategy ;
- the level of growth and its distribution ;
- strategic site allocations (>500 dwellings) and ;
- strategic policies including place shaping requirements and development management policies.

The adopted NNJCS provides the strategic framework for the Corby Local Plan Part 2 (LPP2) so the two Plans are intrinsically linked. The NNJCS is a comprehensive document therefore the LPP2 does not need to re-address issues dealt with in the NNJCS and local detail set out in the LPP2 should not duplicate policies adopted in the NNJCS.

The relationship between the NNJCS, LPP2 and Neighbourhood Plans should be clearly set out in accordance with the revised National Planning Policy Framework (NPPF) (paras 13, 29 & 30 and Footnote 16). Neighbourhood Plans



should not undermine the strategic policies of either the NNJCS or the LPP2 irrespective of whether or not the Neighbourhood Plan is the most recently adopted which would otherwise take precedence.

## **Housing Requirement & Housing Land Supply (HLS)**

The Council should be proactively supporting sustainable development to deliver a significant boost to the supply of housing to meet identified housing needs as set out in the NPPF. The Council should ensure that the NNJCS and LPP2 meet Objectively Assessed Housing Needs (OAHN) in full as far as is consistent with the NPPF including identifying key sites critical to the delivery of the housing strategy over the plan period. The Housing White Paper (HWP) “*Fixing The Broken Housing Market*” also emphasised that the Council should be planning for the right homes in the right places by making enough land available to meet assessed housing requirements.

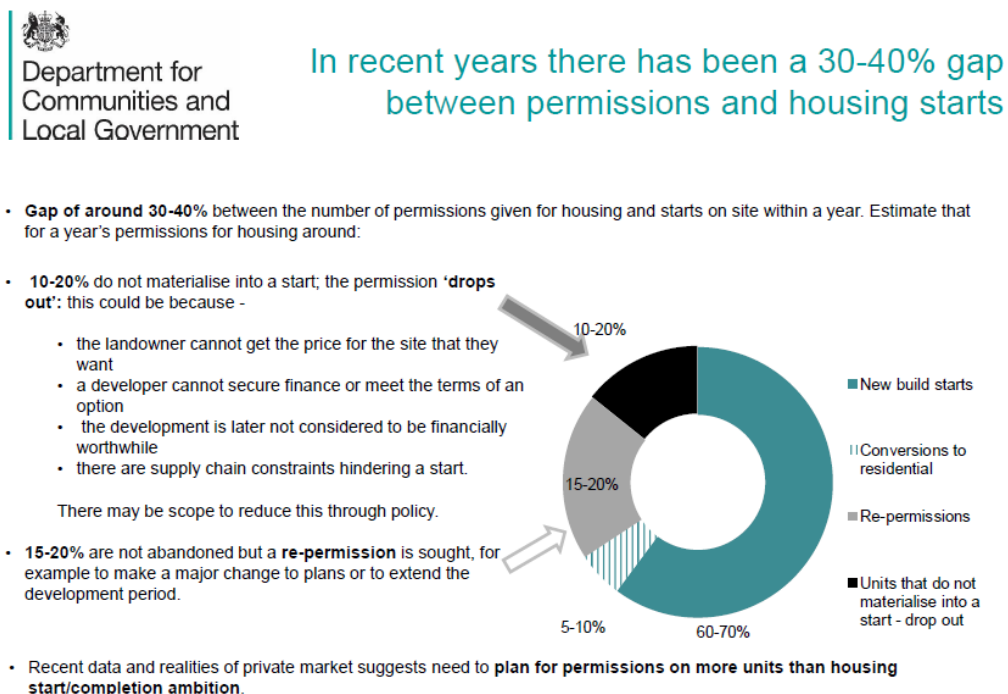
As set out in the adopted NNJCS the housing requirement for Corby is 9,200 dwellings (460 dwellings per annum) or if the strategic growth opportunity is included 14,200 dwellings (710 dwellings per annum) for the plan period 2011 – 2031. The 9,200 dwellings are distributed in :-

- Growth town of Corby for 8,290 dwellings (or 13,290 dwellings including the strategic growth opportunity) ;
- New Village (Little Stanion) for 790 dwellings ;
- Rural Housing for 120 dwellings.

As set out in Table 7 : HLS 2011 – 2031 of the consultation document after the deduction of completions and existing commitments the residual housing requirement is calculated as between 576 – 3,667 (if the strategic growth opportunity is included) dwellings. In this Draft Options consultation there are 11 site allocations proposed in **Draft Policy 9** which are set out in site specific policies (**Draft Policies H1 to H12 & TC1**). The proposed allocations equal circa 757 dwellings to meet the residual housing requirement including a contingency but excluding the strategic growth opportunity. The HBF submit no comments on the merits or otherwise of individual non-strategic sites so our representations are submitted without prejudice to any comments made by other parties. For the Council 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 whilst large strategic sites may have multiple outlets usually increasing the number of sales outlets available inevitably means increasing the number of housing site allocations in the case of Corby strategic sites adopted in the NNJCS should be complimented by smaller scale non-strategic sites. The 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. This approach is also advocated in the HWP because a good mix of sites provides choice for

consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

The HBF agree that a flexibility contingency should be applied to the residual HLS in order that the LPP2 is responsive to changing circumstances and the proposed housing requirement is treated as a minimum rather than a maximum ceiling. The adopted NNJCS also includes 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. The DCLG presentation slide from the HBF Planning Conference September 2015 (see below) illustrates a 10 – 20% non-implementation gap together with 15 – 20% lapse rate. The slide also suggests “*the need to plan for permissions on more units than the housing start / completions ambition*”.



Extract from slide presentation “DCLG Planning Update” by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

The HBF always suggests as large a contingency as possible (at least 20%) if any of the Council’s assumptions on lapse rates, windfall allowances and delivery rates were to be adjusted or any proposed housing site allocations were to be found unsound then any proposed contingency is eroded. The smaller the Council’s contingency becomes so any built in flexibility of the LPP2 reduces. It is acknowledged there can be no numerical formula to determine the appropriate quantum of such a flexibility contingency however where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites such as in Corby greater numerical flexibility is necessary than in cases where supply is more diversified. As identified in Sir Oliver Letwin’s interim findings large housing sites may be held back by numerous constraints including discharge of pre-commencement planning

conditions, limited availability of skilled labour, limited supplies of building materials, limited availability of capital, constrained logistics of sites, slow speed of installation by utility companies, difficulties of land remediation, provision of local transport infrastructure, absorption sales rates of open market housing and limitations on open market housing receipts to cross subsidise affordable housing. The Council should fully justify the quantum of its proposed residual HLS and contingency.

**Draft Policy 14 – Settlement Boundaries** of the LPP2 interprets whether a site is within or adjoining a settlement boundary for the purposes of **Policies 11 & 13** of the adopted NNJCS. The LPP2 will not allocate any further sites for housing development in the rural area. However it is important that the Council recognises the difficulties facing rural communities in particular housing supply and affordability issues. An approach as permissive as possible to development adjoining as well as within settlement boundaries provides additional flexibility to HLS.

## **Housing Policies**

**Draft Policy 10** of the LPP2 proposes that a proportion of housing to meet needs of older households will be encouraged on sites of more than 50 dwellings. This encouragement is unnecessary given the existing provisions set out in **Policy 30** of the adopted NNJCS. The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as the elderly without seeking a specific housing mix on individual sites above a certain threshold size. Indeed the housing needs of older people is a diverse sector so the LPP2 should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.

It is noted that **Policy 30** of the NNJCS also provides support / encouragement for self / custom build schemes and requires a percentage of such plots on SUEs. 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. **Draft Policy 11** of LPP2 proposes that on sites of more than 125 dwellings 5% self build plots are provided. The HBF is not supportive of restrictive policy requirements for the inclusion of self / custom build housing on other residential development sites such as sites with a threshold greater than 125 dwellings. This approach only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. If these plots are not developed by self / custom builders then these undeveloped plots are effectively removed from the HLS unless the Council provides a mechanism by which these dwellings may be developed by the original non self / custom

builder in a timely manner. Before introducing any such policy the Council should also 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 loss of Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt. Any policy requirement for self / custom build serviced plots on residential development sites should be fully justified and supported by evidence. 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. The existing evidence from the Council’s Self Build Register (31 entries which will be subject to further re-assessment for local eligibility criteria and financial solvency) shows no justification for the policy approach for a percentage on other housing sites. Perhaps the Council should consider an alternative policy approach such as self / custom build plot exception sites in rural areas.

## **Other Policies**

**Draft Policy 1 – Open Space, Sport and Recreation** of the LPP2 states that new housing will be required to provide or improve open space. However para 4.38 correctly clarifies that this requirement only applies to meeting needs arising from new development. It is suggested that the precise wording of **Draft Policy 1** is revised to properly reflect the circumstances for provision and improvement as set out in para 4.38.

It is also noted that a **Health & Wellbeing Supplementary Planning Document (SPD)** is proposed. The Council is reminded that an SPD should not add to the financial burden of development so the Council should not be seeking to impose any requirements on housing development that have not been subject to viability testing. The Regulations are equally explicit in limiting the remit of an SPD so that policies dealing with development management cannot be hidden. In this context the Council is referred to the recent High Court Judgement between William Davis Ltd, Bloor Homes Ltd, Jelson Homes Ltd, Davidson Homes Ltd & Barwood Homes Ltd and Charnwood Borough Council Neutral Citation Number : [2017] EWHC 3006 (Admin) Case No. CO/2920/2017 which deals with a policy within a document that should have been issued in the form of a Development Plan Document (DPD) and not in the form of an SPD because DPDs must, if objection is taken to them, be subject to independent examination whereas SPDs are not.

The inclusion of **Draft Policy 3 – Local Green Space** of the LPP2 is unnecessary because it repeats the NPPF. It is suggested that **Draft Policy 3** is deleted.

## **Conclusions**

For the Corby LPP2 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 LPP2. 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**