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24<sup>th</sup> September 2018

Dear Sir / Madam

**RUTLAND LOCAL PLAN – CONSULTATION ON THE IMPLICATIONS OF  
THE POTENTIAL DEVELOPMENT OF ST. GEORGE’S BARRACKS**

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 comments to the Council’s specific consultation on the implications of the redevelopment of 300 hectare of brownfield land at St. George’s Barracks site in North Luffenham which the Ministry of Defence (MoD) will vacate in 2020/2021.

Since previous consultations on the Rutland Local Plan it is understood that the Council & the MoD have signed a Memorandum of Understanding and prepared an initial Master Plan for a Garden Village of circa 1,500 – 3,000 dwellings of mixed tenures, at least 14 hectares of employment land, new school, social & community facilities, public open space and improved transportation links at St George’s Barracks site in North Luffenham. This proposal will have significant impacts on the vision & strategic objectives, spatial strategy & settlement hierarchy and housing & employment requirements of the Local Plan.

If the St. George’s Barracks site is included in the Local Plan as a proposed strategic site for a Garden Village it is agreed that the amendments set out for A Vision for Rutland in 2036, Strategic Objectives 1 & 12, a new Strategic Objective 2a, Revised Policy RLP3 – The Spatial Strategy for Development and minor revisions to various Minerals & Waste Policies will be necessary. The HBF have no comments on the proposed new Policy RLPxx – St. George’s Garden Village.

The strategic policies of the Local Plan should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs



over the plan period including planning for and allocating sufficient sites to deliver strategic priorities as set out in the revised NPPF (para 23). The policies of the Local Plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (revised NPPF para 67). The Council should also identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (revised NPPF para 68). The Local Plan should include a trajectory illustrating the expected rate of housing delivery over the plan period. A minimum 5 years supply of specific deliverable sites including a buffer should be maintained (revised NPPF paras 73 & 74).

Of the minimum housing requirement of 3,200 dwellings for the plan period 2016 – 2036 the Council expects the St. Georges Garden Village to deliver 1,200 dwellings (100 dwellings per annum) between 2024 - 2036. As set out in Table 1 : Proposed Spatial Distribution across the County, the remaining housing requirement is distributed 1,200 dwellings in Oakham, 300 dwellings in Uppingham and 500 dwellings in the Local Service Centres. This represents a significant reduction in the amount of housing in the existing towns and villages as shown in Table 2. In considering the implications of this significant change to the distribution of housing across the County the Council should consider if this distribution meets the locational housing needs of the resident population. The Local Plan should meet the housing needs of both urban and rural communities.

The soundness of allocating the St. Georges Barracks as a strategic site for the development of a Garden Village and the Council's assumptions for the delivery of development will be tested in due course at the Local Plan Examination. When considering the implications of the inclusion of the St. George's Barracks site the Council should also think about the "what ifs?". So what if the proposed Garden Village development at St. George's Barracks does not start in 2024 which is only allowing a lead in time of circa six years from now? And / or if the anticipated delivery rate is less than 100 dwellings per annum?

The Council should have some flexibility in its Housing Land Supply (HLS) by allocating more sites with a cumulative capacity greater than the minimum housing requirement. Such a flexibility contingency ensures that the Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling. The HBF acknowledge that there can be no numerical formula to determine the appropriate quantum for a flexibility contingency but where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. As identified in Sir Oliver Letwin's draft analysis published on 25<sup>th</sup> June 2018 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. Therefore the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces. If during the Local Plan Examination any of the Council's assumptions were to be adjusted or any proposed housing site allocations were to be found unsound then any proposed contingency would be eroded. The Department of Communities & Local Government (DCLG) presentation slide from the HBF Planning Conference September 2015 (see below) which 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*”.

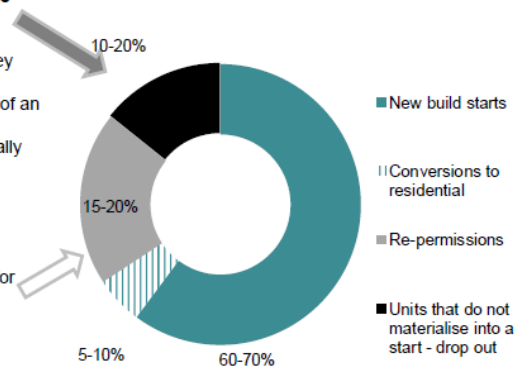


Department for  
Communities and  
Local Government

### In recent years there has been a 30-40% gap between permissions and housing starts

- **Gap of around 30-40%** between the number of permissions given for housing and starts on site within a year. Estimate that for a year's permissions for housing around:
- **10-20%** do not materialise into a start; the permission 'drops out': this could be because -
  - the landowner cannot get the price for the site that they want
  - a developer cannot secure finance or meet the terms of an option
  - the development is later not considered to be financially worthwhile
  - there are supply chain constraints hindering a start.

There may be scope to reduce this through policy.
- **15-20%** are not abandoned but a **re-permission** is sought, for example to make a major change to plans or to extend the development period.
- Recent data and realities of private market suggests need to **plan for permissions on more units than housing start/completion ambition**.



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

The HBF submit no comments on the merits or otherwise of individual sites allocations set out in the Council's previous Local Plan consultations and its latest consultation on additional sites. Our responses 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 increasing housing supply is increasing 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. So large strategic sites should be complimented by smaller scale non-strategic sites. This approach was emphasised in the Housing White Paper “*Fixing the Broken Housing Market*” 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 Local Plan should deliver new housing to meet the full range of local needs including affordable housing and specialist housing. 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. Indeed the housing needs of older people is a diverse sector so the Local Plan should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.

The Council should also consider the allocation of developable reserve sites together with an appropriate release mechanism as recommended by the Local Plans Expert Group (LPEG). The LPEG Report proposed 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). A Reserve Site Policy would provide extra resilience and flexibility to the Local Plan if the St. George's Barracks site started later or delivered less dwellings per annum than anticipated.

In conclusion it is hoped that these responses are of assistance to the Council in informing the next stages of the Rutland Local Plan. If any further information or assistance is required please contact the undersigned.

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



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