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SENT BY E-MAIL ONLY TO
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17th December 2018

Dear Sir / Madam

EAST NORTHAMPTONSHIRE DRAFT LOCAL PLAN PART 2 (LPP2) 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 responses.

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 East Northamptonshire 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.

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 both the 2012 and 2018 National Planning Policy Framework (NPPF). The Council should ensure that the NNJCS and LPP2



meet Objectively Assessed Housing Needs (OAHN) in full as far as is consistent with national policy 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*” 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 East Northamptonshire is 8,400 dwellings (420 dwellings per annum) for the plan period 2011 – 2031 which are distributed :-

- Rushden 3,285 dwellings ;
- Higham Ferrers 560 dwellings ;
- Irthlingborough 1,350 dwellings ;
- Raunds 1,060 dwellings ;
- Thrapston 680 dwellings ;
- Oundle 645 dwellings ;
- Rural area 820 dwellings.

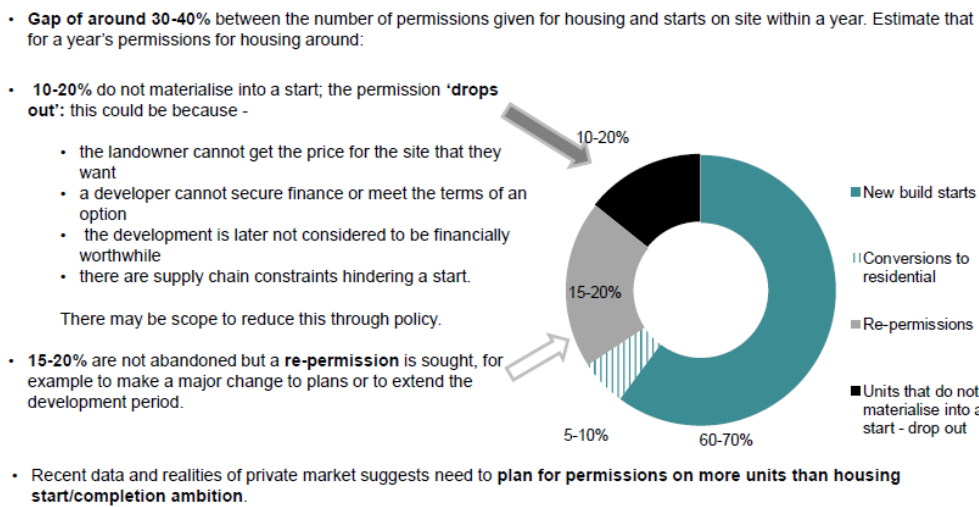
Since adoption of the NNJCS delays have arisen concerning the start dates for the strategic sites at Rushden East and Irthlingborough West resulting in the reduction of 300 dwellings and 385 dwellings respectively from the housing trajectory which now extends full delivery of these strategic sites beyond the plan period. Tables 17 & 18 of the Draft LPP2 identify an overall residual housing requirement of 1,438 dwellings (as at 1st April 2018) after the deduction of completions between 2011 – 2017 and existing commitments (planning permissions consented, resolutions to grant planning permission & allocations). There are residual housing requirements in Rushden, Irthlingborough and Oundle. In **Policy EN24** three site allocations (**Policies EN25 – 27**) are proposed in Oundle but no other site allocations are proposed. Furthermore the Council has determined that a housing site contingency is not necessary on the basis of a 5 Years Housing Land Supply (YHLS) of 5.46 years (using 5% buffer), proposals for a new garden communities settlement at Tresham Garden Village and the prospect of a future review of the NNJCS. The adopted NNJCS includes a commitment to identifying additional land if Sustainable Urban Extensions (SUEs) are not delivered fast enough to maintain 5 YHLS and a partial review of the JCS if SUEs deliver less than 75% of projected completions in three consecutive years.

The Council is reminded that its HLS should meet the adopted housing requirement as set out in the NNJCS which are minimum rather than maximum figures. The Council’s overall HLS should also have some headroom / contingency to provide flexibility to adapt to change as well as providing choice and competition in the land market. It is acknowledged there can be no numerical formula to determine the appropriate quantum of such a flexibility contingency however where a Local Plan is highly dependent upon one or relatively few large strategic sites or a particular settlement / locality greater numerical flexibility is necessary than in cases where supply is more diversified. The HBF always suggests as large a contingency as possible (at least 20%)

because if any of the Council’s assumptions on lapse rates, windfall allowances and delivery rates are subject to adjustment or any proposed housing site allocations are found unsound then any proposed contingency is reduced. The smaller the Council’s contingency becomes so any built-in flexibility of the LPP2 reduces. 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*”.



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



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

For the Council to maximize housing supply the widest possible range of sites by both size and market location are required so that small local, medium regional and large national housebuilding companies have access to suitable land in order to offer the widest possible range of products. Strategic sites adopted in the NNJCS should be complimented by smaller scale non-strategic sites. As advocated in the HWP mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. 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. It is also important that the Council recognises the difficulties facing rural communities including housing affordability caused by a lack of housing supply. An approach as permissive as possible to development adjoining as well as within settlement boundaries (**Policy EN2** : Settlement boundaries in urban areas, **Policy EN3** : Settlement boundaries – freestanding villages, **Policy EN4** : Settlement boundaries – ribbon development & **Policy EN5** : Development on the periphery of

settlements with a defined settlement boundary) should provide additional flexibility to the HLS.

Housing Policies

Policy EN32 : Self & Custom build housing

It is noted that **Policy 30** of the NNJCS provides support and 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 indeed policies encouraging self / custom build have been endorsed in several 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. The Council should also consider a policy approach of self / custom build plot exception sites in rural areas (see South Northamptonshire's pre-submission LPP2 Policy LH5 – Exceptions for Self Build).

The HBF is not supportive of a restrictive policy requirement for 5% self / custom build serviced plots on housing sites of 50 or more dwellings as proposed in **Policy EN32** which 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. The proposed minimum 12 month offered for sale period is too long. The Council should also consider the practicalities of health & safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. The Council should 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 housing sites of 50 or more dwellings should be fully justified and supported by evidence of need. The Council should assess such housing needs 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 Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on housing sites of 50 or more dwellings which would not support the Council's proposed requirements under **Policy EN32**. The following amendment to **Policy EN32** is recommended :-

~~The Council will require applications for the delivery of serviced plots for self and custom build housing in suitable locations where proposals are in compliance with other plan policies.~~

~~On sites of 50 or more dwellings, 5% of the plots should be made available on site as serviced building plots to enable the delivery of self and custom build properties, subject to appropriate demand being identified.~~

The Council will ~~also~~ support applications for the delivery of serviced plots ~~on sites of less than 10 dwellings~~ for self and custom build housing to meet identified demand in suitable locations where proposals are in compliance with other plan policies and ~~particularly where they are~~ encouraged through the preparation of neighbourhood plans.

Conclusions

For the East Northamptonshire LPP2 to be found sound under the four tests of soundness it 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 LPP2 which is unsound. It is hoped that these comments are helpful to the Council in informing the next stages of the East Northamptonshire LPP2. 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