

Newark & Sherwood District Council
Planning Policy Business Unit
Growth & Regeneration
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SENT BY E-MAIL ONLY TO
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Dear Sir / Madam

ALLOCATIONS & DEVELOPMENT MANAGEMENT LOCAL PLAN REVIEW (LPR) - ISSUES 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 to specific questions contained within the Council's Issues Paper consultation documentation.

Compliance with the 2019 NPPF

Question 1 : Do you agree with the Council's assessment of compliance with the 2019 NPPF? Do you believe that there any other matters that need to be addressed?

The Council should remain open-minded because as the Allocations & Development Management LPR progresses it may become necessary to review policies not intended to be changed in response to more recently published national guidance and / or outcomes from the Government's forthcoming Planning Green Paper and / or the Building Better, Building Beautiful Commission.

It is agreed that Policies DM2 : Development on Allocated Sites and DM3 : Developer Contributions & Planning Obligations should be reviewed to take account of new national policy and guidance on viability assessment and developer contributions. Policies DM2 and DM3 should set out the contributions expected from developers including the level and types of affordable housing provision required and other infrastructure for education, health, transport, flood



& water management, open space, digital communication, etc. As set out in the 2019 National Planning Policy Framework (NPPF) such policy requirements should not undermine deliverability of the Allocations & Development Management LPR (para 34). The cumulative burden of infrastructure, other contributions and policy requirements should be set so that most sites are deliverable without further viability assessment negotiations (para 57). It is important that the Council understands and tests the influence of all inputs on viability as this determines if land is released for development. The Council should undertake an updated viability assessment. The Council's Issues Paper does not set out the proposed approach to changes to Policies DM2 and DM3 therefore the HBF may make further comments on this matter during later consultations as preparation of the Allocations & Development Management LPR progresses.

It is also agreed that Policy DM7 : Biodiversity & Green Infrastructure should be reviewed to take account of new national policy on biodiversity and habitats. The Council's Issues Paper does not set out the proposed approach to changes to Policy DM7 therefore the HBF may make further comments on this matter during later consultations as preparation of the Allocations & Development Management LPR progresses.

A separate policy for meeting the needs of an ageing population as set out in the recently published national guidance (NPPG ID63-001 to 019) dated 26th June 2019 should be considered by the Council.

Affordable Housing Policy

Question 2 : Do you agree that the Council should update Affordable Housing policy to reflect latest government policy as set out in the NPPF?

It is agreed that the Council should update its Affordable Housing Policy in relation to site thresholds, requirements for 10% affordable homeownership and entry level exception sites.

Open Breaks

Question 5 : Do you agree that the Open Break designations should be subject to detailed review?

It is agreed that Open Break designations should be subject to detailed review.

Open Space

Question 9 : Do you agree with this approach to the designation of Local Green Space (LGS)?

The HBF agree with the Council's approach to the designation of LGS as part of Neighbourhood Plans provided landowners and / or developers are properly

consulted about proposed LGS designations during both the preparation and examination of Neighbourhood Plans.

Building for Life

Question 10 : Do you agree that consideration should be given to amending Policy DM5 'Design' to include assessment of proposals against the Building for Life 12 standard?

The HBF is supportive of the use of Building for Life 12 as best practice guidance to assist the Council, local communities and developers assess new housing schemes. The HBF has played a fundamental role in establishing Building for Life 12 but it was never intended to become enshrined as a mandatory policy requirement in Local Plans. The use of Building for Life 12 should remain voluntary rather than becoming a requirement of Policy DM5 : Design which would oblige developers to use this tool. If the Council wishes to refer to Building for Life 12 it should be in the supporting text of Policy DM5. If Building for Life 12 was introduced as a mandatory requirement of Policy DM5 then the Council should assess any viability implications. The Council cannot assume that there are no additional costs as the creation of place in terms of local character and site context may involve specific elevational treatments / materials. The Council should also clearly set out the assessment of residential development against Building for Life 12 by expecting a positive performance against the criteria but without achieving a prescribed number of greens under the Building for Life 12 traffic light system of assessment.

Housing Allocations

It is acknowledged that the Allocations & Development Management LPR is the delivery document for the recently adopted Amended Core Strategy. However it is noted that the Amended Core Strategy was examined under transitional arrangements so its adopted housing requirement was based on an Objectively Assessed Housing Need (OAHN) rather than the Government's standard methodology for calculating Local Housing Needs (LHN) as a consequence the Council's adopted housing requirement figure is less than LHN. The adopted housing requirement is a minimum and not a ceiling to sustainable development therefore the Council is encouraged to provide as large a contingency as possible above the adopted housing requirement in the Housing Land Supply (HLS) to ensure that housing needs are met.

A large contingency provides more flexibility to response to changing circumstances and to provide greatest choice and competition in the land market. There is no numerical formula to determine the quantum of a HLS contingency but where the HLS is highly dependent upon one or relatively few large strategic sites in one locality then greater numerical flexibility is necessary than if the HLS is more diversified. The widest possible range of housing sites by both size and market locations should be sought to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products

to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

It is noted that the Council state no new housing site allocations are proposed. As set out in the 2019 NPPF (para 68a) at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target. The Council should confirm that this national policy requirement has been achieved.

Opportunity Sites

Question 13 : Do you agree these are appropriate opportunity sites to support sustainable housing delivery in Newark Urban Area (NUA) if the Sustainable Urban Extensions (SUE) don't come forward as anticipated?

The HBF is supportive of the Council's opportunity site approach if the SUEs in the NUA do not come forward as anticipated. There is no numerical formula to determine the appropriate quantum of opportunity sites but where the HLS is highly dependent upon one or relatively few large strategic sites in one locality then greater numerical flexibility is necessary than if the HLS is more diversified. The HBF do not comment on the merits or otherwise of individual sites selected as opportunity sites.

Conclusion

For the Newark & Sherwood Allocations & Development Management LPR to be found sound under the four tests of soundness as defined by the 2019 NPPF the Plan should be positively prepared, justified, effective and consistent with national policy (para 35). It is hoped that these responses are of assistance to the Council in preparing the next stages of its LPR. If any further information or assistance is required please contact the undersigned.

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



Susan E Green MRTPI
Planning Manager – Local Plans