

West Northamptonshire Joint Planning Unit
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Dear Sir / Madam

WEST NORTHAMPTONSHIRE STRATEGIC PLAN (WNSP) - 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 set out in the Joint Planning Unit's (JPU) Issues Consultation document.

2. Are changes to the vision needed having regard to spatial options and the emerging proposals for the Oxford-Cambridge Arc?

West Northamptonshire falls within the Oxford-Cambridge Arc. The Government have committed to achieving economic growth in the Arc and affirmed its ambition for up to one million high-quality new homes across the Arc by 2050. The WNSP is an opportunity to respond to the Government's proposals for the Arc. West Northamptonshire benefits from key strategic transport infrastructure including linkages to the M1, M40 and M6. There are significant commuter flows from Northampton and South Northamptonshire to Milton Keynes. The vision for the WNSP should be changed to have regard for the spatial options and emerging proposals for the Oxford – Cambridge Arc.

5. Is a plan-period of 2019-2041 appropriate or should it be extended up to 2050 to match the Government's aspirations for the Arc?

A proposed plan period of 2019 – 2041 would accord with the 2019 National Planning Policy Framework (NPPF) for a timescale of fifteen years after plan adoption. As set out in the 2019 NPPF strategic policies should look ahead over a minimum fifteen years period from adoption to anticipate and respond to long term requirements (para 22). Alternatively, there are also benefits in taking a



longer term strategic approach by extending the plan-period up to 2050 to align with the Government's aspirations for the Oxford – Cambridge Arc.

10. Is the 1st April 2019 an appropriate base date for the housing requirement?

The HBF consider that 2019 would be an appropriate base date for the housing requirement.

11. Having regard to the scenarios presented what level of housing growth should the plan be seeking to accommodate? If you support a level of housing that differs from Local Housing Need (LHN) please explain how you think that would be justified?

As set out in the 2019 NPPF the determination of the minimum number of homes needed should be informed by an LHN assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). The standard methodology is set out in the updated National Planning Practice Guidance (NPPG).

It is considered that Table 2 of the consultation document is misleading. LHN assessments are calculated using the 2014 SNHP and affordability ratio for the administrative area of a Local Planning Authority (LPA). For Northampton the figures are for the Borough of Northampton excluding the Northampton Related Development Area (NRDA) which is a conceptual area definition rather than a LPA administrative area. The LHN calculation is correctly set out in the Housing Background Paper which is summarised in the Table below :-

	2014 SNHP Average Annual Growth	Affordability Ratio 2018	Adjustment factor	Annual LHN	Annual LHN (taking into account 40% cap)	Total LHN 2019-2041
Northampton	1,088.1	7.6	1.225	1,332.9	1,333	29,326
Daventry	267.5	10.27	1.391875	372.3	372	8,184
South Northamptonshire	368.9	10.49	1.405625	518.5	516	11,352
West Northamptonshire	1,724.5			2,223.8	2,221	48,862

As set out in the NPPG the LHN figure is calculated at the start of the plan-making process however this number should be kept under review and revised when appropriate (ID 2a-008-20190220). The LHN figure may change as inputs are variable and this should be taken into consideration.

It is also noted that the South Northamptonshire figure is capped. The NPPG states that the application of a cap does not reduce housing need itself. Strategic policies adopted with a cap applied may require early review to ensure that any housing need above the capped level is planned for as soon as reasonably possible. Where the minimum annual LHN figure is subject to a cap consideration can still be given to whether a higher level of housing need could

be realistically delivered to remove the necessity for an early review (ID : 2a-007-20190220). It is suggested that the difference between the capped and uncapped figure for South Northamptonshire is so minimal that a cap should not be applied which negates the requirement for an early review.

The LHN is only the minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to LHN. As set out in the 2019 NPPF the Government’s objective of significantly boosting the supply of homes remains (para 59). The LHN of 2,221 dwellings per annum is lower than the currently adopted West Northamptonshire Joint Core Strategy (WNJCS) housing requirement of 2,324 dwellings per annum. It is important that housing need is not under-estimated.

The Government’s ambitions for the Oxford – Cambridge Arc would justify a level of growth significantly in excess of LHN (also see HBF answer to Q12 below). The Government has clear ambitions to promote economic and housing growth across the Arc. As set out in the NPPG LHN is a starting point and in certain circumstances it may be appropriate to plan for a figure higher than the LHN. These circumstances include deliverable growth strategies for the area and strategic infrastructure improvements which will drive an increase in locally needed homes (ID: 2a-010-20190220). The JPU should consider an Arc-related growth scenario above LHN such a scenario is shown in the Table below:-

Scenario	Approximate Housing Requirement to 2041
Local Housing Need	48900 dwellings
Arc-related Growth	61700 dwellings

As well as considering an Arc-related growth scenario the JPU should be working with adjoining authorities to establish if any unmet need should be provided for in West Northamptonshire. To fully meet the legal requirements of the Duty to Co-operate the JPU should engage on a constructive, active and on-going basis with its neighbouring authorities to maximise the effectiveness of plan making. The WNSP should be prepared through joint working on cross boundary issues. A key element of Local Plan Examination is ensuring that there is certainty through formal agreements that an effective strategy is in place to deal with strategic matters when Local Plans are adopted. As set out in the 2019 NPPF (paras 24, 26 & 27) the JPU should provide a signed Statement of Common Ground (SoCG) between itself and neighbouring authorities. The WNSP should be based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred as evidenced by a SoCG (para 35c).

Finally the JPU should also undertake an updated re-assessment of affordable housing need. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. An increase in the total housing figures

may be considered where it could help deliver affordable housing (ID : 2a-024-20190220).

The HBF conclude that the housing requirement in the WNSP should be significantly higher than the LHN which is just the minimum starting point.

The JPU should also consider provision of a Housing Land Supply (HLS) above the housing requirement to provide additional flexibility and contingency to account for any delivery issues that may arise. The HBF always advocates as large a contingency as possible therefore 20% rather than 10% is recommended. The HBF would encourage the JPU to be as ambitious as possible as the 5 YHLS and Housing Delivery Test (HDT) are monitored against the lowest denominator. A larger contingency provides more flexibility to response to changing circumstances as well as providing greater choice and competition in the land market. There is no numerical formula to determine a contingency quantum but where the HLS is highly dependent upon one or relatively few large strategic sites and / or localities as is the case in West Northamptonshire 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.

12. Would the Government's ambitions for the Oxford-Cambridge Arc justify a level of housing growth significantly in excess of LHN?

The Government's ambitions for the Oxford – Cambridge Arc would justify a level of growth significantly in excess of LHN (also see HBF answer to Q11 above). The Government has clear ambitions to promote economic and housing growth across the Arc. As set out in the NPPG LHN is a starting point and in certain circumstances it may be appropriate to plan for a figure higher than the LHN. These circumstances include deliverable growth strategies for the area and strategic infrastructure improvements which will drive an increase in locally needed homes (ID: 2a-010-20190220). The JPU should consider an Arc-related growth scenario above LHN.

13. What measures could the plan include to diversify the offer on strategic sites, or otherwise increase the rate of housing delivery?

It is known that Sustainable Urban Extensions (SUEs) allocated in the adopted WNJCS have not progressed as quickly as expected. Housing delivery is maximised where a wide mix of sites is provided therefore SUEs should be complimented by smaller non-strategic sites. The HLS should include a short and long-term supply of sites by the identification of strategic and non-strategic allocations for residential development. 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 JPU should confirm that this national policy requirement will be achieved.

14. Are there any particular types of specialist housing that you feel should be increased in supply, do you have any evidence to support this?

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 JPU's focus should be ensuring that appropriate sites are allocated to meet the needs of specifically identified groups. The WNSP should ensure that suitable sites are available for a wide range of types of development across a wide choice of appropriate locations.

15. Are there any other housing issues the plan needs to address that have not been identified?

As set out in the 2019 NPPF all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The JPU should undertake an updated re-assessment of affordable housing needs. The affordable housing policy of the adopted WNJCS should be reviewed to reflect the 2019 NPPF and latest NPPG.

17. Should the plan promote higher levels of economic growth in response to the Government's aspirations for the Oxford-Cambridge Arc?

The Government's ambitions for the Oxford - Cambridge Arc include maximising the economic potential of the area to become an economic asset of international standing. The WNSP should promote more economic growth than required to meet local need as a response to the opportunities presented by the Government's ambitions for the Arc.

22. Do you think that the key principles and objectives for infrastructure identified above are appropriate?

The improvement of transport links across the region and delivery of infrastructure needed to achieve the level of growth outline in the WNSP is of paramount importance.

24. At this stage are there any other spatial options that should be considered?

West Northamptonshire has an overall population of 399,400 people of which 56% live within the urban area of Northampton. In South Northamptonshire and Daventry Districts most residents live in the rural areas outside the market towns of Brackley, Daventry and Towcester. The adopted WNJCS identifies Northampton as the Principal Urban Area, Daventry as a Sub Regional Centre

and Brackley and Towcester as Rural Service Centres. The adopted spatial strategy concentrates development within the existing urban areas and in a small number of SUEs adjoining the urban areas. Only limited development is supported in the rural areas to meet local housing needs and to support local services. Accordingly housing growth is distributed as 28,470 dwellings (66.8%) in Northampton (including NRDA), 4,620 dwellings (10.8%) in Daventry Town, 2,160 dwellings (5.1%) in Brackley Town, 2,650 dwellings (6.2%) in Towcester Town and in the Rural Areas 2,360 dwellings (5.5%) across Daventry District and 2,360 dwellings (5.5%) across South Northamptonshire District. The JPU should consider whether this strategy remains appropriate.

If the existing strategy is not appropriate, other alternative options for the distribution of development should be considered. Other alternative options could include urban intensification, urban extensions, new settlements, growth along key existing or proposed transport corridors, residential development alongside existing or proposed strategic employment areas or dispersed sustainable expansion of smaller settlements which are well linked to existing or proposed infrastructure. The HBF advocates a combination of these alternative strategies.

Conclusions

For the WNSP to be found sound under the four tests of soundness as defined by the 2019 NPPF (para 35), the Plan must be positively prepared, justified, effective and compliant with national policy. It is hoped that these responses are helpful to the JPU in preparing the next stages of the WNSP. As the WNSP preparation progresses the HBF look forward to submitting further representations during later consultations in the meantime if any further assistance or information is required please contact the undersigned.

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



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