



North Northamptonshire Council

North Northamptonshire Strategic Plan Scope and Issues Consultation Response Form

North Northamptonshire Council is preparing a new Strategic Plan for the area. This will review and replace the North Northamptonshire Joint Core Strategy which was adopted in July 2016. The plan is intended to cover the period 2021-2041, although the vision may look further ahead.

The Scope and Issues Consultation is the first stage in preparing the new plan, no decisions have been made yet and the purpose of the document is to raise awareness and stimulate debate.

You can find out more about the Scope and Issues Consultation and view the document electronically at: <https://northnorthants.citizenspace.com/planning/north-northants-strategic-plan-scope-and-issues-co>

You can inspect a hard copy of the consultation document and supporting material at the Council Offices in Corby, Kettering, Thrapston and Wellingborough and the main libraries throughout North Northamptonshire during normal opening hours.

If you have any questions about the consultation or need help completing the form, please email: planningpolicy@northnorthants.gov.uk or call Customer Services on 0300 126 3000 and request a call back from the Planning Policy team.

The consultation period starts on **28 March 2022** and closes at **5.00pm on 23 May 2022**

Our preference is for responses to be submitted using our online questionnaire, however, we will also accept hard copies. Please return your response form:

By e-mail: planningpolicy@northnorthants.gov.uk

By Post: Strategic Plan Team, North Northamptonshire Council, Cedar Drive, Thrapston, Northamptonshire, NN14 4LZ

Data Protection Policy: Any personal Information you provide will be held and processed in accordance with the obligations and principles of the General Data Protection Regulations (GDPR) and the Data Protection Act 2018

To see more about how we record and store your information please see North Northamptonshire Council's consultation and privacy notice: <https://www.northnorthants.gov.uk/your-council/corporate-privacy-notice> and the planning policy section of the [Development Management Service Area Privacy Notice](#)

Please note that it is not possible for responses to be considered anonymously. Summaries of responses will be published on the website but personal information,



North Northamptonshire Council

including address and contact details will not be published or made available for public inspection.

The content of your responses may reveal personal information about yourself or others. It is your responsibility to ensure that your submitted comments do not reveal personal information about others.

By submitting a response, you confirm that you agree to how we process your data and accept responsibility for your comments.

Records will be kept in line with our Retention Policy.

This form has two parts:

Part A – contact details
Part B – your comments

Ref:

(for official use
only)

Part A

1. Personal Details*		2. Agent's Details (if applicable)
<i>* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in column 2.</i>		
Title		MS
First name		SUE
Last name		GREEN
Job title (where relevant)		PLANNING MANAGER
Organisation (where relevant)		HOME BUILDERS FEDERATION (HBF)
Address line 1		HBF HOUSE
Line 2		27 BROADWALL
Line 3		
City/Town		LONDON
County		
Postcode		SE1 9PL
Telephone number		07817 865534
Email (if provided we will always contact you this way)		sue.green@hbf.co.uk

PART B

The Scope and Issues Consultation Document is arranged in sections with associated questions, which are set out below. The questions should be read in conjunction with the consultation document. Please note that you don't have to answer every question.

Vision and Outcomes		
	Question	Your comments
1	Is the vision in the JCS still appropriate for guiding future development and growth in North Northamptonshire. Are there any changes you would like to see to the vision and why?	No comment.
2	Are the spatial outcomes in the JCS still the most appropriate ones for guiding development and growth in North Northamptonshire in light of the issues discussed in this document. What changes to, or other outcomes would you like to see?	No comment.
Relationship with Oxford-Cambridge Arc		
3	How should the Strategic Plan respond to the Oxford-Cambridge Arc?	The NNSP is an opportunity to positively respond to the Oxford - Cambridge Arc. The Government's original ambitions for the Oxford - Cambridge Arc included up to one million high-quality new homes and maximising the economic potential of the area to become an economic asset of international standing. The need for an increased labour supply to meet increasing employment demand will lead to a need for new homes otherwise economic growth may become constrained. The Council should be seeking to achieve a sustainable balance between employment and housing growth. The Council should be ambitious and propose a housing requirement above the minimum LHN for North Northamptonshire.
What period should the plan cover?		
4	Do you agree that the plan-period should be 2021 to 2041? If not, what should it be and why?	A plan period of 2021 – 2041 would not align with the Government's original timeframe for the Oxford – Cambridge Arc, which looked to 2050 and beyond. If however, the Oxford – Cambridge Arc does not proceed as originally anticipated, 2021 – 2041 may

		become an appropriate plan period for the NNSP.
Climate Change		
5	What is a realistic and deliverable pathway for reaching net zero for the Strategic Plan?	<p>It is the Government’s intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council’s specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council does not need to set local energy efficiency standards to achieve the shared goal of net zero emissions because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift, which are effective from June 2022, and proposals for the 2025 Future Homes Standard. The 2021 Interim Uplift to Part L (Conservation of fuel and power) Regulations will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. From 2025, the Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises. The HBF recognise the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The HBF support the Government’s approach for a nationally consistent set of standards via the Building Regulations but there are difficulties and risks to housing delivery, which include the immaturity of the supply chain for the production / installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government changes to Part S of the Building Regulations for the installation of</p>

		Electric Vehicle Charging Points (EVCPs) in new homes. In autumn 2020, the HBF established a Future Homes Task Force to develop workable solutions for the delivery of the home building industry's contribution to meeting national environmental targets and objectives on Net Zero. In September 2021, the Future Homes Delivery Hub supported by involvement from Government was launched.
6	What are the key measures that the plan should take to ensure appropriate climate change adaptation, mitigation and resilience?	See HBF answer to Q5 above.
Levelling Up		
7	How can the Strategic Plan help to level up and ensure no community is left behind?	No comment.
8	Are there priority areas for levelling up that the plan should focus on?	No comment.
The spatial strategy for the distribution of development		
9	Should future needs be met by continuing with the current strategy of urban-focused growth. If not, why	<p>The spatial strategy for the distribution of development should meet the housing needs of both urban and rural communities. An overly urban focussed Spatial Strategy limits the potential number of development sites.</p> <p>The spatial strategy for North Northamptonshire should comprise of a combination of the identified Spatial Options (Dispersal, New Settlements, Corridor-Based Growth & Employment Focus) because of the disadvantages associated with pursuing any one Spatial Option in isolation. If all development sites are large scale Sustainable Urban Extensions (SUEs) and / or New Settlements, there may be long lead in times for the commencement of on-site development and build up to optimum delivery rates. SUEs and New Settlements should be complimented with smaller non-strategic sites, which will ensure a continuous HLS in the short to medium term. Housing delivery will be optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and</p>

		<p>market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. 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 will be maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market. Under the 2021 NPPF, the Council should also identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 69a).</p>
10	Are there any other spatial options not already identified in the consultation document that should be considered?	See HBF answer to Q9 above.
Housing		
11	Should the Strategic Plan set out a provision for housing above Local Housing Need? If so, what should this uplift be?	<p>The NNSP should make provision for a housing requirement above the minimum LHN. The extent of the uplift should be determined by the need to support economic growth, to deliver affordable housing and to assist in meeting any unmet needs from elsewhere.</p> <p>The NPPG explains that “<i>circumstances</i>” may exist to justify a figure higher than the minimum LHN. The “<i>circumstances</i>” for increasing the minimum LHN are listed in the NPPG including, but not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery / assessments of need, which are significantly greater than the outcome from the standard methodology (ID 2a-010-20201216). The Government’s economic growth ambitions for the Oxford -</p>

		<p>Cambridge Arc represent such “<i>circumstances</i>” (also see HBF answer to Q3 above). The Council should be seeking to support the long-term sustainability of North Northamptonshire by achieving a sustainable balance between employment and housing growth.</p> <p>The NPPG also sets out 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 acknowledge that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing.</p> <p>As set out in the 2021 NPPF, the NNSP should be positively prepared and provide a strategy, which as a minimum seeks to meet its own housing needs in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). The Council should prepare a Statement of Common Ground to demonstrate that NNSP is based on effective joint working with neighbouring authorities.</p>
12	<p>What measures could the plan include to diversify the housing offer or otherwise increase the rates of housing delivery?</p>	<p>All households should have access to different types of dwellings to meet their housing needs. To ensure that these housing needs are met, the Council should allocate suitable sites for a wide range of different types of development across a wide choice of appropriate locations (also see HBF answer to Q9 above).</p> <p>Specialist housing for older people including retirement living or sheltered housing, extra care housing or housing-with-care and residential care / nursing homes should be provided. To provide homes for older people, the Council should allocate sites for older persons housing subject to criteria such as the proximity of sites to public transport, local amenities, health services and town centres.</p>

		<p>The Council should also support self & custom build by ensuring that the NNSP will result in a wide range of different self & custom build housing opportunities. It is unlikely that self & custom build serviced plots on larger residential sites will appeal to those wishing to build their own home.</p>
13	<p>Are there any particular types of specialist housing that you feel there should be more of? Do you have any evidence to support this?</p>	<p>See HBF answer to Q12 above.</p>
14	<p>Should the Strategic Plan maintain the approach to accessibility and space standards that are set out in the JCS? Is there any evidence to support exceeding these?</p>	<p>As set out in the 2021 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).</p> <p>If the Council wishes to apply the optional standards for accessible & adaptable homes and NDSS, this should only be done in accordance with the 2021 NPPF (para 130f & Footnote 49) and the latest NPPG. Footnote 49 states that <i>“policies may also make use of the NDSS where the need for an internal space standard can be justified”</i> and <i>“that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties”</i>. The NPPG sets out that <i>“where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing”</i> (ID: 56-020-20150327). The NPPG also sets out the evidence necessary to justify a policy requirement for optional accessible & adaptable standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327).</p> <p>However, if the Government implements proposed changes to Part M of the Building Regulations as set out in the “Raising Accessibility Standards for New Homes” consultation, which closed on 1 December</p>

		2020, the Council's proposed policy approach will be unnecessary.
15	Could the Strategic Plan improve the approach to environmental standards in homes? If so, what could be improved and is there any evidence to support this?	If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the NPPG. The NPPG states that where there is a " <i>clear local need, LPA can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day</i> " (ID : 56-014-20150327). The NPPG also states the " <i>it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement</i> " (ID : 56-015-20150327). The Council should provide evidence demonstrating a clear local need. The NNSP should not set requirements to exceed Building Regulation energy efficiency standards (see HBF answer to Q5 above).
16	Do you agree with the current policy approach to accommodating gypsies and travellers and travelling show people? Please explain your answer.	No comment.
17	Is Policy 31 of the Joint Core Strategy still appropriate for assessing planning applications? Are there any changes you would like to see and why?	No comment.
18	Should the Strategic Plan contain a policy regarding Housing in Multiple Occupation? If yes, please explain.	No comment.
Economic Growth		
19	What can the Strategic Plan do to support the delivery of committed employment sites?	No comment.
20	Should any existing employment allocations be de-allocated/used for	No comment.

	another use? If so which sites and for what use?	
21	Should new sites be identified for employment uses? If so, where and for what type of employment?	No comment.
22	How should the demand for logistics be addressed in the area?	No comment.
23	How can the Strategic Plan deliver high quality, better skilled jobs?	No comment.
24	How can the Strategic Plan help to address skills shortages and promote better training and further and higher education opportunities?	No comment.
25	How should the Strategic Plan encourage appropriate tourism opportunities?	No comment.
Town Centres		
26	How can the Strategic Plan support town centres so they continue to act as the heart of their communities?	No comment.
27	What should the future role of Rushden Lakes and other out-of-centre locations be?	No comment.
Strategic development locations and opportunities		
28	Should the strategic sites threshold of 500+ dwellings or 5+ ha of employment land be retained or amended? Please provide reasons for amendments.	In the HBF's opinion, 500+ dwellings is a reasonable site threshold for the definition of strategic sites.
Infrastructure		
29	What are the key infrastructure priorities that need to be delivered in North Northamptonshire and how can they be best be delivered?	No comment.
Place-making/sustainable development		
30	Does the consultation document identify the correct place-making principles for the Strategic Plan or are there any others that need to be considered?	The 7 identified key principles for place-making are appropriate for the NNSP. However, with reference to specific Bullet Points under Principle 3 – Well Designed &

		Built, see HBF answers to Q5, Q14 and Q15 respectively.
Natural and historic environment		
31	What are the key mechanisms the plan should use to achieve a net environmental gain and how can this be measured?	No comment.
32	Should the plan seek to introduce biodiversity net gain targets above the mandated 10% and align to the Oxford – Cambridge Arc target of 20%?	The NNSP should not seek to introduce BNG targets above the mandated 10%. The 2021 Environment Act requires development to achieve a mandatory 10% BNG. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. The mandatory requirement provides a level playing field across England for developers and reduces the risks of unexpected costs and delays. 10% is not a cap on the aspirations of developers who want to voluntarily go further but a requirement for more than 10% should not be sought by the Council. Locally derived variations cause uncertainty and undermine the level playing field. Furthermore, there are significant costs associated with biodiversity net gain, which should be included and tested in an updated Viability Assessment.
33	Should the plan seek to identify opportunity areas for enhancing the natural environment at a strategic scale? Should this include continuing to identify green infrastructure corridors?	No comment.
34	Should the plan seek to introduce other environmental targets? If so, what should they cover and how should they be measured?	The NNSP should not seek to introduce other environmental targets.
35	How should the plan seek to improve equality of sustainable access to nature and its benefits. Should the plan include standards of access to green space?	No comment.

36	Should the plan identify particular landscapes that are more sensitive to change?	No comment.
37	How should the plan set out a positive strategy for the conservation and enjoyment of the historic environment?	No comment.
Process and next steps		
38	Are there any issues that you feel we have missed and should be considered in the Strategic Plan?	No comment.

Please tick the box if you wish to be kept informed at all the key stages in the process of producing the new Plan.	<input checked="" type="checkbox"/>
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Signature		Date	23/5/22
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**Thank you for taking the time to complete the form.
Please return it to the council
by 5.00pm on 23 May.**