



Oadby & Wigston District Council
Council Offices
Station Road
Wigston
Leicestershire
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SENT BY E-MAIL AND POST

23rd November 2015

Dear Sir / Madam

OADBY & WIGSTON LOCAL PLAN KEY CHALLENGES 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 representations and in due course attend the Local Plan Examination Hearing Sessions to discuss these matters in greater detail.

Objectively Assessed Housing Needs (OAHN) and the Housing Requirement

The Council's reference to a housing requirement of 95 dwellings per annum to 2036 and 100 dwellings per annum to 2031 is consistent with the conclusions set out in the Leicester & Leicestershire SHMA Final Report prepared by G L Hearn dated June 2014. However as the Council is aware from the Charnwood Local Plan Core Strategy Examination Hearing Sessions the HBF and other parties were critical of the assumptions used in this calculation of OAHN. It is believed that this assessment under-estimates OAHN by failing to take full account of :-

- longer term migration trends by using 5 year migration trend ;
- unattributable population change by its exclusion ;
- household formation rates by using a mid-point from a partial return to trend model ;
- worsening trends in market signals ;

- affordable housing needs ;
- no alignment of employment and economic growth trends with the Leicestershire LEP SEP.

Moreover the assessment pre-dates the publication of 2012 Sub National Household Projections (SNHP). The National Planning Practice Guidance (NPPG) sets out that household projections produced by DCLG are the starting point for OAHN (ID 2a-015-20140306). The NPPG confirms that the 2012 SNHP are the most up to date estimate of household growth. Therefore it is recommended that before the Oadby & Wigston Local Plan is submitted for examination an update of OAHN is undertaken.

Land Supply

In allocating sites the Council should be mindful that 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 increased housing supply is the number of sales outlets. Whilst some SUEs may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else been equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

It is noted that the Council refers to previously developed land. If by this reference the Council is prioritising brownfield before green-field then this approach would be inconsistent with national policy. The core planning principle set out in paragraph 14 of the National Planning Policy Framework (NPPF) is to “*encourage the effective use of land by re-using land that has been previously developed (brownfield land)*” such encouragement is not setting out a principle of prioritising brownfield before green-field land. Similarly paragraph 111 of the NPPF states that “*Local Planning Authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land*” again there is no reference to prioritising the use of brownfield land. The Council’s proposed prioritisation relates back to previous national policies which are now inconsistent with current national policy. In paragraph 17 of his determination of the Planning Appeal at Burgess Farm in Worsley Manchester (APP/U4230/A/11/215743) dated July 2012 (4 months after the introduction of the NPPF) the Secretary of State confirms that “*national planning policy in the Framework encourages the use of previously developed land but does not promote a sequential approach to land use. It stresses the importance of achieving sustainable development to meet identified needs*”. Therefore it is suggested that the Council’s proposed referencing is changed to encourage the re-use of previously developed land.

Viability and Policy Requirements including Affordable Housing

If the Oadby & Wigston Local Plan is to be compliant with the national policy, the Council must satisfy the requirements of paragraphs 173 and 174 of the NPPF whereby development should not be subject to such a scale of obligations and policy burdens that viability is threatened. Therefore viability must be properly assessed. The residual land value model is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on viability. As a consequence it is important to understand and test the influence of all inputs on the residual land value as this determines whether or not land is released for development. The Harman Report highlighted that “*what ultimately matters for housing delivery is whether the value received by land owners is sufficient to persuade him or her to sell their land for development*”. It is recommended that the Council undertakes an up to date whole plan viability assessment as soon as possible in order to justify any policy requirements including affordable housing provision proposed in the Local Plan.

S106 Contributions

It is noted that the Council is proposing not to adopt a Community Infrastructure Levy (CIL) but instead continue to rely upon S106 contributions. The Council should re-consider whether or not the pooling restrictions imposed in April 2015 will have any impact on this proposal.

Climate Change

Any proposed policies on Climate Change should be consistent with the Written Ministerial Statement dated 25th March 2015, the Productivity Plan published in July 2015 and the Housing & Planning Bill 2015.

Conclusions

For the Oadby & Wigston Local Plan to be found sound under the four tests of soundness as defined by paragraph 182 of the NPPF, the Plan should be positively prepared, justified, effective and consistent with national policy otherwise the Plan would be found unsound at examination.

It is hoped that the above mentioned responses are of assistance to the Council in informing the next stages of the Oadby & Wigston Local Plan. In the meantime if any further information or assistance is required please contact the undersigned.

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



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