



The Planning Policy & Housing Manager
Rutland Council
Catmose
Oakham
Rutland
LE15 6HP

SENT BY E-MAIL AND POST

12th January 2016

Dear Sir / Madam

RUTLAND LOCAL PLAN REVIEW CONSULTATION

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 and in due course appear at future Examination Hearing Sessions to discuss these matters in greater detail.

The HBF supports the Council's proposals to extend the end of the plan period from 2026 to 2036 and to combine the existing Core Strategy (adopted in July 2011) and the Site Allocations Plan (adopted in October 2014) into one single document as envisaged by the NPPF. However the HBF would suggest that the combined document is kept as concise as possible.

Rutland forms part of the Peterborough Housing Market Area (HMA) together with Peterborough, South Kesteven and South Holland. The updated Peterborough HMA Report by G L Hearn dated October 2015 identifies an OAHN of 173 dwellings per annum as opposed to the previous figure of 150 dwellings per annum for Rutland. This represents an OAHN of 3,640 dwellings over the plan period of 2015 – 2036. However as this figure has not yet been subject to scrutiny during a Local Plan Examination it is recommended that the Council should not be planning for any less than 173 dwellings per annum.

With regards to the relationship between the Local Plan and Neighbourhood Plans the Local Plan should provide the strategic framework with which the Neighbourhood Plans must conform. Such strategic matters should include

OAHN and the housing requirement as well as the distribution and allocation of sites. The Local Plan should also deal with what if scenarios in particular the Council should satisfy the what, where and when criteria set out in the NPPG.

The apportionment of the housing requirement to the towns and villages and future directions of growth should give due consideration to meeting the housing needs of rural areas especially as Rutland is one of the least affordable areas in the country. The NPPG emphasises that all settlements can play a role in delivering sustainable development in rural areas so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. One of the Core Planning Principles of paragraph 17 of the NPPF is to *“take account of the different roles and character of different areas ... recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it”*. This principle is re-emphasised in paragraph 55 of the NPPF which states *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”*.

In allocating sites for a further 1,581 dwellings 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.

The Council should review its references to prioritising brownfield land references contained in existing policies for compliance with national policy.

Any policy seeking to determine housing mix should not attempt to micro-manage development. The Council should acknowledge that there are a number of ways to meet different housing needs. The Council should also update references to Building for Life and Lifetime Homes in Policy CS19 and the Code for Sustainable Homes in Policy CS20.

The Council should consider updating its whole plan viability assessment too. 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. Therefore 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*”. In this context the Council should test the requirement for 80% rented affordable housing in Policy CS11 against this summer’s announcement of downward rent reductions over the next four years set out in the Productivity Plan. The Council will also have to take account of any changes to the NPPF as a result of the current Government consultation on the definition of affordable housing and Starter Homes Initiative.

For the Rutland 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. The Council should consider the above mentioned suggestions as submitted by the HBF in order to produce a sound Plan. In the meantime it is hoped that these representations are of assistance to the Council in informing the next stages of the Rutland Local Plan Review. 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

e-mail: sue.green@hbf.co.uk

Mobile : 07817 865534