



Daventry District Council
Local Strategy Service
Lodge Road
Daventry
Northamptonshire
NN11 4FP

SENT BY E-MAIL AND POST

11 March 2016

Dear Sir / Madam

**DAVENTRY SETTLEMENTS & COUNTRYSIDE LOCAL PLAN (PART 2A) –
ISSUES & OPTIONS 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 representations and in due course appear at the Local Plan Part 2A Examination Hearing Sessions to discuss these matters in greater detail.

The proposed Local Plan Part 2A will establish a local strategy for the settlements and countryside in Daventry in accordance with the adopted West Northamptonshire Joint Core Strategy (WNJCS). The Issues & Options document identifies a number of key issues including :-

- only 4 years into the plan period existing commitments and completions have exceeded the rural areas housing target ;
- the about 2,360 dwellings in the rural areas of WNCS Policy S3 is not a ceiling on sustainable development ;
- the Council's objective is to support vibrant rural communities ensuring these communities thrive and remain vital ;
- whilst the housing requirement has been met in the larger rural settlements some smaller settlements may benefit from development to meet needs and sustain services / facilities ;

- high house prices mean affordability in the rural areas is a problem ;
- the North East Daventry Sustainable Urban Extension (SUE) has not progressed as expected with still no planning application submitted. The number of expected completions has been revised downwards leaving a residual housing requirement of 511 dwellings ;
- a number of Neighbourhood Plans are progressing ahead of the Local Plan Part 2A.

In response to these key issues the HBF would recommend that the Council remains as flexible as possible in its proposed policies in the Local Plan Part 2A including :-

- using a combination of the identified delivery options ;
- not using overly restrictive development management policies on the edge of Daventry or rural settlements ;
- not introducing Article 4 Directions to prevent change of use from employment to residential or agricultural to residential.

It is important that the Plan's proposed housing distribution recognises the difficulties facing rural communities including lack of housing supply and unaffordability. 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 the NPPF (para 17) 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 para 55 which states "*to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities*".

It is suggested that the Local Plan Part 2A should establish a settlement hierarchy based on ranking / scoring of facilities. However it is also suggested that proposed settlement boundaries should not be drawn too tightly thereby inhibiting flexibility for alternative sustainable developments coming forward if any unforeseen problems occur with existing consents and / or strategic site allocations as the Council has experienced at the North East Daventry SUE.

The Council should also set out the appropriate relationship between the adopted WNJCS, the Local Plan Part 2A and Neighbourhood Plans. It is important that strategic policies are identified so that Neighbourhood Plans are in general conformity with these policies.

When allocating sites to meet the residual housing requirement of 511 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 sustainable urban extensions (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 being 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.

It is noted that there are numerous references to Supplementary Planning Documents (SPDs) in which a number of policy requirements are proposed. These proposed policy requirements include :-

- Thresholds for the provision of specialist housing and a requirement for the higher optional standard of M4(2) adaptable / accessible homes of the Building Regulations. As set out in the NPPG (ID 56-007 and ID 56-003) this policy requirement should be justified based on need and viability tested ;
- Water efficiency standards as set out in NPPG (ID 56-015) if the higher optional standard of 110 litres per person per day is proposed then the need for and viability of opting for this standard should be properly justified in evidence ;
- Energy efficiency standards the Council should not be setting any standards to exceed the requirements as set out in the Building regulations. The only permissible reference is for a proportion of energy used to be from renewable or low carbon sources ;
- Thresholds for the inclusion of self build dwellings the HBF supports self-build / custom build in principle for its potential additional contribution to overall housing supply where this is based on a positive policy approach by the Council to increase the total amount of new housing development and meet an identified and quantified self-build / custom build housing need. However the HBF is not supportive of a restrictive policy requirement approach for the inclusion of such housing on sites over a specified size. This approach provides no additionality to land supply but merely changes production from one to another type of builder. It is suggested that consideration is also given to the practicalities of implementing such a policy requirement including health & safety implications, working hours, length of build programmes, etc. The Council should refer to the East Devon Inspector's Final Report which expresses reservations about the implementation difficulties associated with this sort of policy. It is suggested that any policy to encourage self-build / custom build is subject to viability considerations and specific site circumstances and based on evidence identifying demand for such housing.

- The question is whether or not the Council is able to justify adoption of the Nationally described space standard. If the Council wishes to adopt this standard it should be justified by meeting the criteria set out in the NPPG (ID 56-020) including need, viability and impact on affordability.

The Council is reminded that the NPPF (paragraph 154) is explicit that SPDs should not add to the financial burden of development. The Regulations are equally explicit in limiting the remit of an SPD so that policies dealing with development management cannot be hidden in an SPD.

Under Question 56 concerning any other matters it is also noted that if the Daventry Local Plan Part 2A is adopted by 2017 only circa 11 years will remain before the end of the plan period rather than the 15 year time horizon specified in the NPPF (para 157). It is suggested that in order for the Council to positively plan for new housing development and its longer term housing needs there should be a review of the adopted WNJCS sooner rather than later and an amalgamation of the Part 1 and 2 Plans into one document as preferred by Government.

It is also suggested that the Glossary should include some additional definitions, for example, self build / custom build.

For the Daventry Local Plan Part 2A 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. It is suggested that the Council gives due consideration to the above mentioned matters in order to produce a sound Local Plan. We hope that these initial comments are helpful in informing the next stages of the Local Plan Part 2A. In the meantime if you require any further assistance or information 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