

North Northamptonshire Joint Planning Unit
c/o East Northamptonshire Council
Cedar Drive
Thrapston
Northamptonshire
NN14 4LZ

SENT BY E-MAIL AND POST

16 March 2016

Dear Sir / Madam

NORTH NORTHAMPTONSHIRE JOINT CORE STRATEGY MAIN MODIFICATIONS 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.

The removal of the prioritising of previously developed land as set out in **MM3**, **MM6** and **MM28** are acceptable.

The HBF remains concerned about the wording of **Bullet Point e)v of Policy 8 – Place Shaping Principles**. The Deregulation Act specifies that no additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings should be set in Plans other than the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings. The HBF concern is that **Bullet Point e)v of Policy 8** may result in the introduction of a local standard / policy requirement for fire safety measures because of the way in which it is interpreted and implemented in the making of development management decisions. This concern is not removed by the insertion of the word "*proportionate*" in **MM4**. Therefore **Bullet Point e)v of Policy 8** as modified remains unsound because it is unjustified and inconsistent with national policy. It is recommended that the reference to fire safety measures in **Bullet Point e)v of Policy 8** is deleted.

With reference to **MM5** which modifies **Policy 9 – Sustainable Buildings & Allowable Solutions** it is agreed that the authorities can specify the proportion of energy generated from on-site renewables and / or low carbon energy sources as proposed under para 4.17 of the JCS supporting text. However the authorities cannot set a local standard for energy efficiency equivalent to CSH Level 4 which is above the current 2013 Building Regulations standard as proposed under para 4.22 of the supporting text of the JCS and in **Policy 9**.

The Deregulations Act removed the power of authorities to require residential developments to exceed the energy performance requirements of Building Regulations therefore the authorities should not be setting any additional local technical standards or requirements relating to the performance of new dwellings. **MM5** is unsound because it is unjustified and inconsistent with national policy and therefore it should be deleted.

If **MM27** is to ensure that OAHN will be met in the North Northamptonshire HMA over the plan period it is necessary for the proposed mechanism to be both positive and effective. Therefore the consequence of delivering less than 75% of the projected housing completions from the SUEs for 3 consecutive years should be more than just the "*consideration of the need for a review of the JCS*". It is recommended that **MM27** is amended so this failure triggers an actual review of the JCS. Moreover to ensure that OAHN will be met in the North Northamptonshire HMA over the plan period it is equally important that the Local Plans Part 2 prepared by individual authorities are capable of delivering the required housing land supply. These Local Plans Part 2 should be consistent with both the NPPF and the strategic policies of the JCS. Therefore the JCS should also include provisions to trigger the review of existing Local Plans on adoption of the JCS, for example, the Rural North, Oundle & Thrapston Plan in East Northamptonshire.

It is hoped that these representations are of assistance to the JPU and the Inspector in informing the next stages of the North Northamptonshire JCS. In the meantime if any further information or assistance is required please contact the undersigned.

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



Susan E Green MRTPI
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