



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

SENT BY E-MAIL AND POST

9th March 2015

Dear Sir / Madam

NORTH NORTHAMPTONSHIRE JOINT CORE STRATEGY PRE SUBMISSION 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 Examination Hearing Sessions to debate these matters in greater detail.

Duty to Co-operate

In Paragraph 9.5 of the North Northamptonshire Joint Core Strategy the Joint Planning Unit (JPU) states that neighbouring Local Planning Authorities (LPA) will be meeting their own objectively assessed housing needs (OAHN) in their own areas. However at this time it is important to acknowledge that the latest Peterborough Housing Market Area Assessment (SHMAA) is not yet published so the JPU statement may be premature.

Housing Needs

Policy 28 – Housing Requirement sets out a housing requirement of 35,000 dwellings (1,750 dwellings per annum) for the North Northamptonshire Housing Market Area (HMA) over the plan period of 2011 - 2031 or 40,000 dwellings if a non-transferable strategic opportunity at Corby is included. **Policy 28** also sets out the proposed distribution of this housing requirement

between the individual Districts of the North Northamptonshire HMA. The proposed housing requirements are :-

- Corby - 9,200 dwellings (460 dwellings per annum) or 14,200 dwellings (710 dwellings per annum) including the strategic opportunity ;
- East Northamptonshire – 8,400 dwellings (420 dwellings per annum) ;
- Kettering – 10,400 dwellings (520 dwellings per annum) ;
- Wellingborough – 7,000 dwellings (350 dwellings per annum).

Policy 29 – Distribution of New Homes sets out the distribution of housing provision within the individual Districts according to a settlement hierarchy comprising of growth towns, market towns, villages and open countryside.

North Northamptonshire is an appropriately defined HMA. However there are concerns about the work undertaken by the JPU and its consultants CCHPR on OAHN as set out in the following two documents :-

- Housing Background Paper – Objectively Assessed Needs and Housing Requirement dated January 2015 ;
- Assessing Housing Requirement of North Northamptonshire dated December 2013.

The housing requirement in the Pre-submission Joint Core Strategy is derived from an OAHN which projects forward 2011-based household projections with an adjustment for household formation rates (HFR) for the 25 – 34 age group only and an adjustment for in migration to Corby. No further upward adjustments for employment forecasts, market signals or affordable housing needs are made.

The National Planning Practice Guidance (NPPG) sets out that household projections produced by DCLG are just the starting point for OAHN (ID 2a-015-20140306). Other factors such as economic forecasts, worsening trends in market signals and affordable housing needs should also be considered which may necessitate an upward adjustment above demographic projections (ID 2a-018-20140306, 2a-019-20140306 and 2a-020-20140306).

It is submitted that the JPU and its consultants have taken a very pessimistic and precautionary approach to assumptions used in the OAHN which do not accord with the Government's overall growth agenda and more specifically the National Planning Policy Framework (NPPF) requirement under Paragraph 47 "*to boost significantly housing supply*". So for example the JPU have not sensitivity tested its demographic modelling for :-

- adjustments to HFR in other age groups ;
- alternatives to 2008 tracking such as an indexed approach ;
- full return to trend rather than a partial return to trend ;
- an earlier start date for the tracking to commence as opposed to delaying until 2025 ;

Moreover the JPU does not appear to make any separate assessment of affordable housing needs.

There is also a concern that the JPU refers to only one economic forecast by Oxford Economics dated 2013. The JPU should have looked at a range of forecasts and more up to date information which may have been less pessimistic about economic growth.

Likewise with regards to market signals the JPU is of the opinion that the North Northamptonshire HMA has performed no worse than the elsewhere either regionally or nationally. However it is recognised by housing experts and all three main political parties that England suffers from a serious long term under supply of housing. Such housing under supply has many adverse social consequences meaning many households cannot form and existing households are trapped in inappropriate housing as well as economic consequences meaning house prices are high in relation to household income causing problems of affordability and negative effects on the labour market and wealth distribution.

There is no allowance for second homes in the conversion of households to houses calculation.

No doubt after the publication of the 2012-based household projections by DCLG on 27th February 2015 the JPU will be undertaking a re-refresh of its OAHN. It is suggested that as part of this work the above criticisms are addressed and any subsequent changes consulted upon before submission of the North Northamptonshire Joint Core Strategy for Examination.

Housing Supply

Policy 28 – Housing Requirement sets out a proposal for housing delivery in ten year periods of 2011 – 2021 and 2021 – 2031 which is slightly back-loaded with 43% of proposed housing delivery in the first ten years and 57% thereafter. In the plan period the average yearly housing delivery is proposed as 1,500 dwellings per annum between 2011 – 2021 and 2,000 dwellings per annum between 2021 – 2031 against an annualised housing requirement of 1,750 dwellings per annum. The JPU should clarify whether or not this proposed housing delivery is indicative only and whether or not there is any intention to hold back development from coming forward sooner.

In **Policy 29 – Distribution of New Homes** the focus for growth is in the towns with only limited development proposed in the villages and open countryside. It is understood that 17,000 dwellings out of 35,000 dwellings are proposed on Sustainable Urban Extensions (SUEs) equal to 48.5% of the overall housing land supply. The JPU should be mindful that when identifying locations for growth and site allocations to meet OAHN the widest variety of sites by size, location and market type should be considered to enable the house building industry to maximise housing delivery.

From the JPU supporting evidence it has not been possible to ascertain if there is a 5 years housing land supply (YHLS) available in the individual

Districts. If there is not reasonable certainty that the each District has a 5 YHLS the Joint Core Strategy cannot be sound as it would be neither effective not consistent with national policy as set out in Paragraph 47 of the NPPF. Moreover if the Joint Core Strategy is not to be out of date on adoption it is critical that the land supply requirement is achieved as under Paragraph 49 of the NPPF *“relevant policies for the supply of housing will not be considered up to date if the LPA cannot demonstrate a five year supply of deliverable housing sites”*. The JPU should provide further information on 5 YHLS especially as a large proportion of the land supply is proposed from SUEs and emerging site specific Development Plan Document (DPD) allocations without planning consents and sites identified in the Strategic Housing Land Availability Assessment (SHLAA) as explained in Paragraphs 9.13 and 9.16 of the Joint Core Strategy.

It is also noted that **Policy 6 – Development on Brownfield Land & Land Affected by Contamination, Policy 11 – Network of Urban & Rural Areas** and **Policy 29 – Distribution of New Homes** prioritise the use of previously developed land. This prioritising of previously developed land is contrary to the NPPF. The core planning principle set out in Paragraph 14 of the 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 greenfield 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 JPU references to 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 **Policies 6, 11 and 29** should be reworded.

Similarly in **Policy 11 – Network of Urban & Rural Areas** the prioritising of other locations that are readily accessible by a choice of means of travel is putting one aspect of sustainable development above other equally important considerations thereby potentially undermining a presumption in favour of sustainable development.

Other Policies

Paragraph 4.11 is misrepresentative of the scoring of Building for Life 12. It is understood that a score of 9 out of 12 greens rather than 12 greens from an independent assessor forum would be sufficient to warrant Building for Life 12 status. Therefore this Paragraph should be modified and re-worded accordingly.

In the context of residential development it is not understood what Bullet Point (e)(v) *“incorporating ... fire safety measures”* of **Policy 8 - North**

Northamptonshire Place Shaping Principles means. The JPU should provide further clarification.

It is not obvious that the higher than Building Regulations requirements for water efficiency in an area of water stress set out in **Policy 9 - Sustainable Buildings & Allowable Solutions** have been properly tested in the North Northamptonshire Joint Core Strategy Pre Submission Plan Draft Viability Study up-date of January 2015.

In Bullet Point 3 of **Policy 9** the JPU should encourage but not presume that investment from Allowable Solutions is in North Northamptonshire. Recent Government consultations have stated that such choices are for developers to make and developers should not be dictated to by LPAs.

In **Policy 30 – Housing Mix & Tenure** Bullet Point (b) and (c) the JPU proposes to introduce the nationally described space standard and the optional requirements in Part M of the Building Regulations Category 2 – accessible and adaptable dwellings and a proportion of Category 3 – wheelchair user dwellings as set out in the Government’s Housing Standards Review consultation dated September 2014. However in order to do so the JPU must evidence and satisfy specific tests on need, viability, affordability and timing as set out in the Government’s consultation document which will assess the impact and effect of these policies in the local area. So for example :-

- Need – what is the size and type of dwellings currently being built in the local area to ensure that the impacts of adopting nationally described space standards can be properly assessed in the future? ;
- Viability – what is the impact of potentially larger dwellings on land supply? ;
- Affordability – how will affordability be maintained in the local housing market? ;
- Timing – is there the need for a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost into future land acquisitions?

In Bullet Point (d) of **Policy 30** subject to viability development sites of more than 15 dwellings in growth and market towns should provide 30% affordable housing and elsewhere on development sites of more than 11 dwellings 40% affordable housing provision should be provided. However the JPU acknowledges in Paragraph 7.6 of its Housing Background Paper dated January 2015 that viability is challenging and between 2001/02 – 2013/14 only 20% affordable housing provision was achieved. In North East Corby affordable housing provision was even lower at only 10%. There is a concern that **Policy 30** sets the affordable housing provision too high and as a consequence the majority if not all development sites will have to be individually negotiated on viability delaying housing delivery across North Northamptonshire.

Policy 30 in Bullet Point (g) also requires that SUEs and strategic developments should make available serviced plots to facilitate Custom Build.

If the JPU wishes to encourage custom build based on evidence that such a need exists this should be done positively to increase the overall amount of new housing development rather than by a restrictive policy requirement for inclusion of such housing on larger development sites. The JPU should give further consideration to the practicalities (for example health & safety implications, working hours, length of build programmes, etc.) of implementing this policy. It is also noted that Custom Build is not defined in the glossary of terms in Appendix 2 therefore it is suggested a definition is included. There is no evidence that Bullet Point (g) of **Policy 30** has been subject to viability testing as required by Paragraphs 174 and 175 of the NPPF.

Conclusions

For the North Northamptonshire Joint Core Strategy to be found sound under the four tests of soundness defined by Paragraph 182 of the NPPF, the Joint Core Strategy must be positively prepared, justified, effective and compliant with national policy.

At present the North Northampton Joint Core Strategy is unsound because of a number of unresolved issues as set out in the preceding text which in summary include :-

- a housing requirement based on an unduly pessimistic OAHN ;
- prioritising of development on previously developed land ;
- unconfirmed 5 YHLS in each of the District authorities ;
- overly burdensome policy requirements on allowable solutions, water efficiency, nationally described space standards, Category 2 accessible & adaptable dwellings, Category 3 wheelchair user dwellings, percentage of affordable housing provision and custom build dwellings, which have not been viability tested ;

It is hoped that these comments are helpful to the JPU in informing the next stages of the North Northamptonshire Joint Core Strategy. In the meantime if any further assistance or information 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