



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

SENT BY E-MAIL ONLY

26<sup>th</sup> January 2018

Dear Sir / Madam

## **DAVENTRY DRAFT SETTLEMENT & COUNTRYSIDE LOCAL PLAN (PART 2) 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 appear at the Local Plan Part 2 Examination Hearing Sessions to discuss these matters in greater detail.

### **Spatial distribution & Housing Land Supply (HLS)**

The Local Plan Part 2 will establish a local strategy for the settlements and countryside in Daventry in accordance with the adopted West Northamptonshire Joint Core Strategy (WNJCS). The Council states that **Policy R1** as set out in the adopted WNJCS is no longer required. It is proposed that **Policies RA1 to RA5** in the Local Plan Part 2 supersede **Policy R1**. However **Policy R1** may remain relevant as the housing requirement in the WNJCS is not a ceiling so the supersession of this policy may not be appropriate and beyond the scope of the Local Plan Part 2.

It is also noted that **Policy SP1 Bullet Point (H)** prioritises development on previously developed land (PDL) contrary to national policy. The NPPF (para 111) encourages the effective use of land by re-using land that has been previously developed (brownfield land) but it does not prioritise the use of such land against sustainable development on non-brownfield land.

The Daventry Local Plan Part 2 proposes a settlement hierarchy comprising of Primary Service Villages, Secondary Service Villages, Other Villages and Small Settlements / Hamlets. It is proposed that a “confine” or development boundary for each settlement is established. Under **Policy RA1** development within the confine of a settlement is permitted but outside a settlement confine development is only permitted in exceptional circumstances. It is suggested that these proposed settlement confines are not drawn too tightly. The use of settlement confines to arbitrarily restrict sustainable development from coming forward on the edge of settlements is not a positive approach. A more flexible approach to development in the rural area should not be ruled out. It is important that the Council 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”*. The Council should consider permitting sustainable development that is well related to and not just within settlement confines if any unforeseen problems occur with existing consents and / or strategic site allocations which in the past the Council has experienced at the North East Daventry Sustainable Urban Extension (SUE).

The Council has acknowledged that the North East Daventry SUE has not progressed as expected with still no planning application submitted. As a consequence the Council has revised downwards the number of expected completions leaving a residual housing requirement of 511 dwellings. The Local Plan Part 2 proposes three housing site allocations in Daventry as set out in **Policy HO1 – Daventry South West** (minimum 800 dwellings), **Policy HO2 – Daventry Micklewell Park Extension** (approximately 180 dwellings) and **Policy HO3 – Middlemore** (at least 100 dwellings) but no site allocations in the rural area.

The Council’s overall HLS includes a contingency of circa 11% to cater for unforeseen circumstances such as slower than expected delivery, non-implementation of existing consents, economic change, and flexibility and choice in the housing market. The Council should justify that this level of contingency is sufficient. The HBF is supportive of such contingency planning but always recommends a contingency greater than circa 11%.

Furthermore if the Council cannot demonstrate a 5 YHLS on adoption of the Local Plan Part 2 then the Plan cannot be found sound. The HBF’s preferences for the calculation of 5 YHLS are the Sedgfield approach to shortfalls as set out in the NPPG (ID 3-035) with a 20% buffer applied to both the annualised housing requirement and any shortfall.

## **Policy HO4 – Self build & custom housebuilding**

The HBF supports custom build in principle for its potential contribution to overall housing supply. The Council's approach to self / custom build should be positively undertaken to increase the total amount of new housing developed rather than by a restrictive policy requirement for inclusion of such housing on allocated sites. Such positive policy responses include supporting development on small windfall sites as well as allocating more small sites. The HBF is not supportive of a policy approach that only changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply.

## **Policy HO7 – Housing Mix & Type**

The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. Therefore planning for a mix of housing needs should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households without seeking a specific housing mix on individual sites as proposed in **Policy HO7 Bullet Points B & C**. Moreover the housing needs of older people is a diverse sector so the Local Plan Part 2 should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations. The Council should justify its requirement for specialist accommodation on SUEs. It is suggested that the Council re-considers these Bullet Points.

**Policy HO7 Bullet Point D(i)** also proposes that 50% of all dwellings are accessible & adaptable compliant homes for market homes 45% M4(2) and 5% M4(3) and for affordable homes 40% M4(2) and 10% M4(3). The Written Ministerial Statement dated 25<sup>th</sup> March 2015 stated that "*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG*". If the Council wishes to adopt the higher optional standards for accessible & adaptable homes the Council should only do so by applying the criteria set out in the NPPG (ID 56-005 to 56-011). All new homes are built to Building Regulation Part M standards so it is incumbent on the Council to provide a local assessment evidencing the specific case for Daventry which justifies the inclusion of M4(2) & M4(3) optional higher standards in its Local Plan policy. If it had been the Government's intention that evidence of an ageing population justified adoption of the higher standards then the logical solution would have been to incorporate such standards as mandatory via the Building Regulations which the Government has not done. The Council is also reminded that the requirement for M4(3) should only be required for dwellings over which the Council has housing nomination rights as set out in the NPPG (ID 56-008). It is suggested that the Council re-considers this Bullet Point.

**Policy HO7 Bullet Point D(iii)** proposes adoption of the Nationally Described Space Standard (NDSS). The Written Ministerial Statement dated 25<sup>th</sup> March

2015 confirms that “*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG*”. If the Council wishes to adopt the NDSS this should only be done by applying the criteria set out in the NPPG. The NPPG sets out that “*Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas need, viability and timing*” (ID: 56-020) :-

- **Need** - It is incumbent on the Council to provide a local assessment evidencing the specific case for Daventry which justifies the adoption of the NDSS in the Local Plan Part 2. If it had been the Government’s intention that generic statements justified adoption of the NDSS then the logical solution would have been to incorporate the standards as mandatory via the Building Regulations which the Government has not done. The NDSS should only be introduced on a “need to have” rather than a “nice to have” basis. The identification of a need for the NDSS must be more than simply stating that in some cases the standard has not been met it should identify the harm caused or may be caused in the future. Indeed the Council’s evidence identifies that average house sizes are exceeding standards so there is no systemic problem to resolve.
- **Viability** - The impact on viability should be considered in particular an assessment of the cumulative impact of policy burdens. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The Council cannot simply expect home buyers to absorb extra costs in a Local Plan area where there exists severe affordability pressures. There is also an impact of larger dwellings on land supply. The requirement for the NDSS would reduce site yields or the number of units on a site. Therefore the amount of land needed to achieve the same number of units must be increased. The efficient use of land is less because development densities have been decreased. At the same time the infrastructure and regulatory burden on fewer units per site intensifies the challenge of meeting residual land values which determines whether or not land is released for development by a willing landowner especially in lower value areas and on brownfield sites. It may also undermine delivery of affordable housing at the same time as pushing additional families into affordable housing need because they can no longer afford to buy a NDSS compliant home. The Council should undertake an assessment of these impacts.
- **Timing** - The Councils should take into consideration any adverse effects on delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be predicated on market affordability at relevant price points of units and maximising absorption rates. An adverse impact on the affordability of starter home / first time buyer products may translate into reduced or slower delivery rates. As a consequence the Council should put forward proposals for transitional arrangements. The land deals underpinning the majority of identified

sites will have been secured prior to any proposed introduction of NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any outline or detailed approval prior to the specified date and any reserved matters applications should not be subject to the nationally described space standards.

It is suggested that the Council re-considers this Bullet Point.

**Policy HO7 Bullet Point D(iv)** proposes adoption of the higher optional water efficiency standard. The Written Ministerial Statement dated 25<sup>th</sup> March 2015 confirms that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”*. If the Council wishes to adopt the higher optional standard for water efficiency the Council should only do so by applying the criteria set out in the NPPG. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The NPPG (ID 56-013 to 56-017) refers to *“helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand”*. It is suggested that the Council re-considers this Bullet Point.

## **Conclusion**

For the Daventry Local Plan Part 2 to be found sound under the four tests of soundness as defined by the NPPF (para 182), 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 representations are helpful in informing the next stages of the Local Plan Part 2. 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**  
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