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11<sup>th</sup> January 2019

Dear Sir / Madam

## **NORTH WEST LEICESTERSHIRE LOCAL PLAN REVIEW (LPR) – EMERGING 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 responses to specific questions contained within the Council's consultation documentation.

### **Making sure that we have sufficient land for housing**

#### **Question 1 - Should the plan build in a flexibility allowance?**

The LPR should build in a flexibility allowance to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum figure and to provide choice as well as competition in the land market.

#### **Question 2 - If we build in flexibility should the plan include a 'buffer' to the housing requirement figure when deciding how much land to allocate for new housing or should we identify reserve sites?**

Any built-in flexibility should include both a buffer to the housing requirement and reserve sites.

#### **Question 3 - If we were to include a 'buffer' what would be an appropriate figure?**

There is no numerical formula to determine the appropriate quantum for a flexibility contingency but where the housing land supply (HLS) is highly dependent upon one or relatively few large strategic sites and / or specific settlements / localities then greater numerical flexibility is necessary than if the



HLS is more diversified. For the Council to maximize housing delivery the widest possible range of sites by size and market location is required so that small local, medium regional and large national house building companies have access to suitable land in order to offer the widest possible range of products. The HBF always suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces. If during the LPR Examination any of the Council's assumptions on lapse rates, windfall allowances and delivery rates are adjusted or any proposed housing site allocations are found unsound then so any proposed contingency reduces.

**Question 4 - If we were to identify reserve sites under what circumstances should sites be released?**

The release of reserve sites should be triggered by under performance against planned housing delivery set out in the housing trajectory and 5 YHLS.

**Question 5 - Should the review build in the potential for sites to be developed which go beyond the end of the plan period?**

The LPR should build in the potential for large strategic sites to be developed beyond the end of the plan period.

**Question 6 - Are there any other ways that the plan can build in flexibility?**

Other ways to build in additional flexibility include a permissive policy approach to sustainable development adjacent to as well as within development boundaries, rural exception sites for self / custom build housing and / or LPR sooner than every 5 years under certain specified circumstances.

**Should we change the settlement hierarchy?**

**Question 13 - Do you agree that the settlement hierarchy policy should be amended so as to allow for some development in small villages where it can be demonstrated that it is to meet the needs of somebody with a local connection?**

The settlement hierarchy policy should be reviewed.

**Where will new development go?**

**Question 16 - Is this general approach to site assessment methodology an appropriate one?**

The HBF submit no comments on the selection of individual sites. As set out in the 2018 National Planning Policy Framework (NPPF) the strategic policies of the LPR should provide a clear strategy for bringing enough land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities (para 23).

## **How should we meet the needs for self and custom house building?**

### **Question 18 - Should we include a specific policy on self and custom build?**

Self and custom build housing should be supported for its potential additional contribution to housing supply.

### **Question 19 - Which of the options do you prefer and why?**

The allocation of sites for self and custom build housing is supported.

A proportion of self / custom build serviced plots on larger housing allocations is not supported which only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. If serviced plots are not developed by self / custom builders then these undeveloped plots are effectively removed from the HLS unless the Council provides a mechanism by which these plots may be developed by the original non self / custom builder in a timely manner. Before introducing any such policy proposal the Council should consider the practicalities of health & safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. There is the loss of Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt. Any policy requirement for self / custom build serviced plots on larger housing sites should be fully justified and supported by evidence of need. As set out in the National Planning Practice Guidance (NPPG) (ID 2a-021) the Council should fully assess the demand from people wishing to build their own homes by collating data from reliable local information (including the number of validated registrations on the Council's Self / Custom Build Register). The Council should also analyse the preferences of these entries as often only individual plots in rural locations are sought as opposed to plots on larger housing sites. The Register may not provide the justification for this proposed policy approach.

### **Question 20 - If a percentage approach is supported, what threshold and percentage would you apply and why?**

This approach is not supported by the HBF (see answer to Question 19 above).

### **Question 21 - Should the Council allocate sites for self and custom housebuilding properties only and/or seek to identify opportunities for self and custom plots as part of allocated housing sites?**

See answer to Question 19 above.

### **Question 22 - Should the occupation of these 'allocated' plots be restricted, in the first instance, to those on the Council's self and custom build register?**

The occupation of self / custom build plots should not be restricted.

**Question 23 – Are there any other options we should consider?**

The Council should also consider a policy approach of rural exception sites for self and custom build housing.

**How can the Local Plan help to address issues relating to health and wellbeing?**

**Question 26 – Do you support the use of a Health Impact Assessment (HIA) Screening Statement to demonstrate the potential impact of a proposal, and to identify whether a more in depth HIA is required?**

The use of a HIA Screening Statement should demonstrate the potential impact of a development proposal and identify if a full HIA is required.

**Conclusions**

In conclusion it is hoped that these responses are helpful to the Council in informing the next stages of the North West Leicestershire LPR. If any further information or assistance is needed please contact the undersigned.

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



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