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## Housing White Paper

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### SYNOPSIS

The purpose of this report is to inform Members of the Housing White Paper, and to agree a response to the consultation

#### 1. Introduction

- 1.1 The Housing White Paper 'Fixing our broken housing market' was published by the Department for Communities and Local Government on 7<sup>th</sup> February 2017. It sets out the Government's strategy to build homes and tackle the impact of the housing shortage. At the end of the White Paper there are 38 questions which the Government wants responses to. The closing date for comments is 2<sup>nd</sup> May 2017.
- 1.2 At the same time, the DCLG published several other documents including the starter homes consultation, responses to the technical consultation on the implementation of planning changes and proposed changes to the National Planning Policy Framework along with a new consultation on Planning and affordable housing for Build to Rent. There is also a report of a review of the Community Infrastructure Levy.
- 1.3 The consultation document and related papers are available to view on the DCLG website at [www.gov.uk](http://www.gov.uk).
- 1.4 A strategic response to the consultation questions will be considered by the Joint Northamptonshire Delivery Committee on 13<sup>th</sup> April and the Joint Planning Committee on 27<sup>th</sup> April 2017.

#### 2. Details

- 2.1 This report highlights the major proposals within the white paper, whilst the accompanying Appendix A sets out the consultation questions and proposed detailed response.
- 2.2 As reported previously to members of this committee on 8<sup>th</sup> March 2017, the Housing White Paper is complex and lengthy, covering a wide range of proposals. It details the numerous and various initiatives under four main headings as follows:
  - Planning for the right homes in the right places
  - Building homes faster
  - Diversifying the market
  - Helping people now

##### Planning for the right homes in the right places

- 2.3 The Government has identified a range of measures to create a positive planning framework to deliver housing, these include the following:
  - Requirement to update development plans at least once every five years;
  - Powers of intervention to speed up plan making in poorly performing Councils including directing authorities to work together;
  - Introduce flexibility so that plans can be prepared by groups of authorities or combined authority

- Requirement for authorities to prepare a Statement of Common Ground on Plan Making;
- Amend the test for assessing Local Plans 'soundness'
- The Government will consult on proposals for a standardized methodology for assessing housing requirements.

2.4 The White Paper also sets out other policy proposals to encourage good quality house building:

- Measures to promote the re-use of brownfield land
- Clarifying the NPPF, to make clear the circumstance which would prevent an Local Planning Authority from delivering their housing requirements, the presumption in favour of sustainable development and the importance of brownfield land
- Changes and extensions to the land registration system to increase transparency, including comprehensive registration by 2030
- Measures to relax rules around local authority land disposal
- Promotion of thriving rural communities by promoting development on small windfall sites in settlements, the allocation of small sites in Neighbourhood Plans, encouragement for rural exceptions sites and small sites in development plans
- Increased importance of design, both in planning policy and as part of the consideration of the planning application process
- Changes to the NPPF to encourage more efficient use of land, including higher densities where appropriate

#### Building Homes Faster

2.5 The Government are proposing a number of measures which aim to provide greater capacity in Local Planning Authorities. They propose the following:

- Giving Local Planning Authorities the opportunity to have their housing land supply agreed on an annual basis, and fixed for a one year period to tackle the problem of planning appeals based on five year land supply issues
- Boosting local authority capacity and capability to deliver by allowing local authorities to increase planning fees by 20% from July 2017 if they commit to invest the additional fee income in their planning department, and consider allowing an increase of a further 20% for those delivering a given level of house building.
- Proposals to consult on introducing a fee for making a planning appeal to deter unnecessary appeals

2.6 The Government is also proposing that it will consult on requiring Local Planning Authorities to have high quality digital infrastructure policies within their Plans. The other major area within this chapter refers to holding developers and local authorities to account for the delivery of housing. These proposals include:

- To require more information about the timing and pace of delivery for new housing
- Taking into account a developers past record on housing delivery
- To simplify and speed up the completion notice process, whereby if development on a site has stopped and there is no prospect of completion, the Local Planning Authority can withdraw planning permission for the remainder of the site.
- Introduce a housing delivery test to hold local authorities and their wider interests to account for delivering homes, requiring a local authority to publish an action plan where the numbers of new homes are lower than the numbers of those suggested are needed.

#### Diversifying the Market

2.7 The White Paper identifies that the housing market has become dominated by small number of major volume house builders. They propose a number of measures to diversify the market:

- Backing small and medium-sized builders to grow, including through the £3 billion Home Building Fund;
- Supporting custom-build homes with greater access to land and finance, giving more people more choice over the design of their home;
- Bringing in new contractors through the Accelerated Construction programme that can build homes more quickly than traditional builders;
- Aim to encourage institutional investors to invest more widely in the housing market including building homes specifically for market rent, increasing choice and driving up standards for people living in the private rented sector.
- Both housing associations and councils encouraged to explore all avenues to build more homes and improve efficiency.
- Boosting productivity and innovation by encouraging modern methods of construction in house building.
- Encourage Build to Rent products which will be the subject of separate consultation.

### Helping People Now

2.8 The White Paper acknowledges that many of the proposals within it will take some to have an effect therefore there is a requirement to help people currently in need. Proposals to assist include the following:

- Continuing to support people to buy their own home – through Help to Buy and Starter Homes
- The proposed Starter Homes programme will not require 20% of Starter Homes as part of new development; instead it proposes that the NPPF will be amended to introduce a clear policy expectation that housing sites deliver a minimum of 10% ‘affordable home ownership units’. It also sets out a new definition of affordable housing for consultation.
- The £1.2 billion Starter Home Land Fund will be invested to support the preparation and release of more brownfield land for development. These sites will include a higher proportion of starter homes.
- Clarification that starter homes can be acceptable on rural exception sites in conjunction with appropriate local connection tests.
- Helping households who are priced out of the market to afford a decent home that is right for them through investment in the Affordable Homes Programme
- Improving neighbourhoods by continuing to crack down on empty homes, and supporting areas most affected by second homes
- Encouraging the development of housing that meets the needs of our future population
- Helping the most vulnerable who need support with their housing, developing a sustainable and workable approach to funding supported housing in the future
- Doing more to prevent homelessness by supporting households at risk before they reach crisis point as well as reducing rough sleeping.

2.9 The White Paper also trails a number of schemes which aim to protect those in the private rented sector:

- Government will consult early this year, ahead of bringing forward legislation to ban letting agent fees to tenants.
- Government is keen improve safety and standards in the private rented sector, and drive out the rogue landlords. Measures introduced in the Housing and Planning Act 2016 include banning orders to remove the worst landlords or agents from operating, and enable local councils to issue fines as well as prosecute.
- Proposals to make the private rented sector more family-friendly by taking steps to promote longer tenancies on new build rental homes.
- Government will consult on a range of measures to tackle unfair and unreasonable abuses of leasehold.

### 3. Options to be considered (if any)

There are three realistic options available.

- Option 1 - endorse the response contained in Appendix A
- Option 2 - review the response, and add further comments
- Option 3 – not respond. However, it is considered that this would undermine any opportunities to influence Government policy

### 4. Issues to be taken into account

#### ***Policy Priorities***

The wide ranging proposals contained in the White Paper could have significant implications for the Council's key priorities.

#### ***Financial***

None directly linked to this report.

#### ***Legal***

None directly linked to this report.

#### ***Performance Information***

None directly linked to this report.

#### ***Best Value***

None directly linked to this report.

#### ***Human Rights***

None directly linked to this report.

#### ***Equalities and Sustainability***

None directly linked to this report.

#### ***Risk Management***

It is important to respond to the consultation to ensure that the Council's views on the proposed changes to national planning policy are made known to the Government

### 5. Recommendation

It is recommended that Local Plan Committee agrees the response to the consultation questions set out at Appendix A as the Council's response to the Housing White Paper, subject to any agreed changes.

#### **Background Papers**

'Fixing our Broken Housing Market' – a housing white paper setting out the Government's plans to reform the housing market and boost the supply of new homes in England. (DCLG, 7<sup>th</sup> February 2017). <https://www.gov.uk/government/uploads>

Local Plan Committee, 8<sup>th</sup> March 2017 <https://www.corby.gov.uk/local-plan-committee-8-march-2017>

Joint Delivery Committee for North Northamptonshire, 13<sup>th</sup> April 2017  
[http://www.kettering.gov.uk/meetings/meeting/1538/joint\\_delivery\\_committee\\_for\\_north\\_northamptonshire](http://www.kettering.gov.uk/meetings/meeting/1538/joint_delivery_committee_for_north_northamptonshire)

#### **Officer to Contact**

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## Appendix A

### Question 1

Do you agree with the proposals to:

- a) **Make clear in the NPPF that the key strategic policies that each local planning authority should maintain are those set out currently at paragraph 156 of the Framework, with an additional requirement to plan for the allocations needed to deliver the area's housing requirement?**

Yes.

- b) **Use regulations to allow Spatial Development Strategies to allocate strategic sites, where these strategies require unanimous agreement of the members of the combined authority?**

Yes.

- c) **Revise the NPPF to tighten the definition of what evidence is required to support a 'sound' plan?**

*Tighter definition of what evidence is required to support a 'sound' plan is welcomed. It should be clarified that the evidence base should be proportionate dependent on the Local Plan being produced.*

### Question 2

**What changes do you think would support more proportionate consultation and examination procedures for different types of plan and to ensure that different levels of plans work together?**

*It is considered that where strategic issues have already been addressed through the Plan making process, i.e. through the North Northamptonshire Joint Core Strategy, Part 1 of the Local Plan, these issues should not be revisited through the examination of Part 2 Local Plans.*

### Question 3

Do you agree with the proposals to:

- a) **amend national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people?**

*No. The NPPF, at paragraph 50 bullet point 1, already states that local planning authorities should plan for the needs of different groups including older people and people with disabilities, along with the needs of other groups.*

- b) **from early 2018, use a standardised approach to assessing housing requirements as the baseline for five year housing supply calculations and monitoring housing delivery, in the absence of an up-to-date plan?**

Yes.

### Question 4

Do you agree with the proposals to amend the presumption in favour of sustainable development so that:

- a) **authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?;**

*It is unclear from the Housing White Paper as to whether this specifically relates to brownfield land. It is considered that the Joint Core Strategy sets a clear strategy for North Northamptonshire through Policy 11.*

- b) **it makes clear that identified development needs should be accommodated unless there are strong reasons for not doing so set out in the NPPF?;**

*No. Corby Borough Council objects to any proposal that seeks to secure development in crude quantitative terms at any cost.*

- c) the list of policies which the Government regards as providing reasons to restrict development is limited to those set out currently in footnote 9 of the NPPF(so these are no longer presented as examples), with the addition of Ancient Woodland and aged or veteran trees?

Yes.

- d) its considerations are re-ordered and numbered, the opening text is simplified and specific references to local plans are removed?

Yes.

#### **Question 5**

**Do you agree that regulations should be amended so that all local planning authorities are able to dispose of land with the benefit of planning consent which they have granted to themselves?**

*Yes. Local authorities, as public accountable bodies, should be able to freely sell land with planning permission to speed up housing delivery.*

#### **Question 6**

**How could land pooling make a more effective contribution to assembling land, and what additional powers or capacity would allow local authorities to play a more active role in land assembly (such as where 'ransom strips' delay or prevent development)?**

*Corby Borough Council currently operates a Deferred Developer Contribution process which aims to capture uplift in land values at later stage.*

*More effective and simplified Compulsory Purchase Order powers are required to bring forward land that is identified in the Local Plan. It would be helpful when granting planning permission authorities could ensure that ransom strips or other restrictive covenants that would block the delivery of future phases of development could be prevented, especially of land allocated in the Local Plan.*

#### **Question 7**

**Do you agree that national policy should be amended to encourage local planning authorities to consider the social and economic benefits of estate regeneration when preparing their plans and in decisions on applications, and use their planning powers to help deliver estate regeneration to a high standard?**

*Social and economic benefits are already taken into account as part of the NPPF and still need to be balanced with environmental considerations. Estate regeneration should be encouraged but it must be recognised that viability is a key consideration.*

#### **Question 8**

**Do you agree with the proposals to amend the NPPF to:**

- a) **highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing?;**

*Neighbourhood Plans are able to do that without changes to the NPPF.*

- b) **encourage local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the authority's housing needs?;**

*Yes the current Local Plan already does this.*

- c) **give stronger support for 'rural exception' sites – to make clear that these should be considered positively where they can contribute to meeting identified local housing needs, even if this relies on an element of general market housing to ensure that homes are genuinely affordable for local people?;**

*Policy 13 of the Joint Core Strategy already does this.*

- d) **make clear that on top of the allowance made for windfall sites, at least 10% of sites allocated for residential development in local plans should be sites of half a hectare or less?;**

*We do not support this measure. It is considered that this places too onerous a burden on local planning authorities, and could slow down Local Plan preparation.*

- e) **expect local planning authorities to work with developers to encourage the sub-division of large sites?;**

*Corby Borough Council already encourages the sub-division of large sites. The Sustainable Urban Extensions are sub-divided into smaller development parcels. The issue is how to make some of these available for small and medium-sized house builders (including custom and self-builders) to work alongside the major volume house builders.*

- f) **encourage greater use of Local Development Orders and area-wide design codes so that small sites may be brought forward for development more quickly?.**

*Design Codes are in place in all consented Sustainable Urban Extensions in Corby. Developers have advised that these have helped drive up quality and sales. Given the considerable resource required to develop it would only be in the interest of Local Planning Authorities to undertake this for special areas. The use of these Codes is considered to be a much quicker mechanism than the use of Local Development Orders.*

#### **Question 9**

**How could streamlined planning procedures support innovation and high-quality development in new garden towns and villages?**

*Concern that streamlining planning processes for these types of developments undermines the basic principles of sustainability and place additional infrastructure burden on existing communities*

#### **Question 10**

**Do you agree with the proposals to amend the NPPF to make clear that:**

- a) **authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements?**
- b) **where land is removed from the Green Belt, local policies should require compensatory improvements to the environmental quality or accessibility of remaining Green Belt land?**
- c) **appropriate facilities for existing cemeteries should not to be regarded as 'inappropriate development' in the Green Belt?**
- d) **development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate in the Green Belt, provided it preserves openness and does not conflict with the purposes of the Green Belt?**
- e) **where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined through a neighbourhood plan (or plans) for the area in question?**
- f) **when carrying out a Green Belt review, local planning authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs?**

*No comment.*

#### **Question 11**

**Are there particular options for accommodating development that national policy should expect authorities to have explored fully before Green Belt boundaries are amended, in addition to the ones set out above?**

*No comment.*

## **Question 12**

**Do you agree with the proposals to amend the NPPF to:**

- a) indicate that local planning authorities should provide neighbourhood planning groups with a housing requirement figure, where this is sought?**

*It is recognised that a housing requirement figures for neighbourhood planning groups would be welcomed by some neighbourhood planning groups but this proposal places additional resource burdens on the local planning authorities and raises concerns about the practicalities of doing this e.g. the geographic areas that might be covered by neighbourhood plans are relatively small and consequently providing an individual housing target may be neither viable or workable. Should the Government progress this proposal, further guidance on the methodology for calculating housing need in a neighbourhood plan area will be required.*

- b) make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) are expected to set out clear design expectations; and that visual tools such as design codes can help provide a clear basis for making decisions on development proposals?**

*The NPPF, at paragraph 58, already states that local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.*

- c) emphasise the importance of early pre-application discussions between applicants, authorities and the local community about design and the types of homes to be provided?**

*Yes.*

- d) makes clear that design should not be used as a valid reason to object to development where it accords with clear design expectations set out in statutory plans?**

*Yes.*

- e) recognise the value of using a widely accepted design standard, such as Building for Life, in shaping and assessing basic design principles – and make clear that this should be reflected in plans and given weight in the planning process?**

*Yes. Building for Life has informed the North Northamptonshire Place Shaping Principles embedded in the Joint Core Strategy.*

## **Question 13**

**Do you agree with the proposals to amend NPPF to make clear that plans and individual development proposals should:**

- a) make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?**

*Corby Borough Council supports the efficient use of land. However the density of development should be determined on a site by site basis taking account of local character.*

- b) address the particular scope for higher density housing in urban locations that are well served by public transport, that provide opportunities to replace low-density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?**

*Density standards should be determined at local level and not within national policy.*

- c) ensure that in doing so the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs?**

*Yes.*

- d) **take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in areas with good access to facilities nearby?**

*There should be some flexibility but not where for example it would lead to poor design or unacceptable living standards.*

#### **Question 14**

**In what types of location would indicative minimum density standards be helpful, and what should those standards be?**

*Disagree that the use of minimum density standards would be helpful. Density standards should be addressed through the Local Plan process in response to local circumstances and not prescribed by national policy.*

#### **Question 15**

**What are your views on the potential for delivering additional homes through more intensive use of existing public sector sites, or in urban locations more generally, and how this can best be supported through planning (using tools such as policy, local development orders, and permitted development rights)?**

*Existing public sector sites should be the subject of the same considerations as any other site.*

#### **Question 16**

**Do you agree that:**

- a) **where local planning authorities wish to agree their housing land supply for a one year period, national policy should require those authorities to maintain a 10% buffer on their 5 year housing land supply?;**

*It is agreed that local planning authorities should be given the opportunity to fix the housing land supply assessment. However it is not considered practical to fix for a one year period, due to the time and resources required to agree this. A three year fixed period would be helpful.*

- b) **the Planning Inspectorate should consider and agree an authority's assessment of its housing supply for the purpose of this policy?**

*This is not considered to be a practical solution, due to the resources required to undertake this.*

- c) **if so, should the Inspectorate's consideration focus on whether the approach pursued by the authority in establishing the land supply position is robust, or should the Inspectorate make an assessment of the supply figure?**

*See above, we don't think this mechanism is appropriate*

#### **Question 17**

**In taking forward the protection for neighbourhood plans as set out in the Written Ministerial Statement of 12<sup>th</sup> December 2016 into the revised NPPF, do you agree that it should include the following amendments:**

- a) **a requirement for the neighbourhood plan to meet its share of local housing need?**

*We don't agree with this. It is reiterated that the geographic areas that might be covered by neighbourhood plans are relatively small and consequently providing an individual housing target may be neither viable nor workable.*

- b) **that it is subject to the local planning authority being able to demonstrate through the housing delivery test that, from 2020, delivery has been over 65% (25% in 2018; 45% in 2019) for the wider authority area?**

*Yes in principle but impractical as explained in the response to question above.*

- c) **should it remain a requirement to have site allocations in the plan or should the protection apply as long as housing supply policies will meet their share of local housing need?**

*No comment.*

### **Question 18**

**What are your views on the merits of introducing a fee for making a planning appeal?**

**We would welcome views on:**

- a) **how the fee could be designed in such a way that it did not discourage developers, particularly smaller and medium sized firms, from bringing forward legitimate appeals;**

*Yes but at an appropriate scale of development.*

- b) **the level of the fee and whether it could be refunded in certain circumstances, such as when an appeal is successful;**

*No comment.*

- c) **whether there could be lower fees for less complex cases.**

*No comment.*

### **Question 19**

**Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?**

*Yes, we are already doing this through Policy 10 of the Joint Core Strategy.*

### **Question 20**

**Do you agree with the proposals to amend national policy so that:**

**the status of endorsed recommendations of the National Infrastructure Commission is made clear?;**

*No comment.*

**authorities are expected to identify the additional development opportunities which strategic infrastructure improvements offer for making additional land available for housing?**

*Disagree. Additional development opportunities should be plan led through the Local Plan process.*

### **Question 21**

**Do you agree that:**

- a) **the planning application form should be amended to include a request for the estimated start date and build out rate for proposals for housing?**

*Yes in principle but information from developers needs to be robust and Local Planning Authorities need ability to enforce against it.*

- b) **that developers should be required to provide local authorities with basic information (in terms of actual and projected build out) on progress in delivering the permitted number of homes, after planning permission has been granted?**

*Yes.*

- c) **the basic information (above) should be published as part of Authority Monitoring Reports?**

*Yes.*

- d) **that large house builders should be required to provide aggregate information on build out rates?**

Yes.

#### **Question 22**

**Do you agree that the realistic prospect that housing will be built on a site should be taken into account in the determination of planning applications for housing on sites where there is evidence of non-implementation of earlier permissions for housing development?**

*No. Deliverability of housing is essentially a commercial judgement on the part of an applicant. The definition of "realistic prospect" and what the developer should have to provide by way of assurance e.g. evidence of finances, would need to be set out clearly if this approach were to be pursued.*

#### **Question 23**

**We would welcome views on whether an applicant's track record of delivering previous, similar housing schemes should be taken into account by local authorities when determining planning applications for housing development.**

*No. Planning permission runs with the land rather than the applicant. Provided a planning application meets required technical standards, it should be determined in accordance with the development plan, taking account of other material considerations. The past record of an applicant should not be a material consideration, not least because the site may well be subdivided or sold on to other parties for development.*

#### **Question 24**

**If this proposal were taken forward, do you agree that the track record of an applicant should only be taken into account when considering proposals for large scale sites, so as not to deter new entrants to the market?**

*No.*

#### **Question 25**

**What are your views on whether local authorities should be encouraged to shorten the timescales for developers to implement a permission for housing development from three years to two years, except where a shorter timescale could hinder the viability or deliverability of a scheme? We would particularly welcome views on what such a change would mean for SME developers.**

*This is an option already available to local planning authorities.*

#### **Question 26**

**Do you agree with the proposals to amend legislation to simplify and speed up the process of serving a completion notice by removing the requirement for the Secretary of State to confirm a completion notice before it can take effect?**

Yes.

#### **Question 27**

**What are your views on whether we should allow local authorities to serve a completion notice on a site before the commencement deadline has elapsed, but only where works have begun? What impact do you think this will have on lenders' willingness to lend to developers?**

*Concerned about other matters related to commencement notices*

#### **Question 28**

**Do you agree that for the purposes of introducing a housing delivery test, national guidance should make clear that:**

- a) **The baseline for assessing housing delivery should be a local planning authority's annual housing requirement where this is set out in an up-to-date plan?**

Yes.

- b) **The baseline where no local plan is in place should be the published household projections until 2018/19, with the new standard methodology for assessing housing requirements providing the baseline thereafter?**

*This would be dependent upon the methodology.*

- c) **Net annual housing additions should be used to measure housing delivery?**

Yes.

- d) **Delivery will be assessed over a rolling three year period, starting with 2014/15 – 2016/17?**

*Assessment over a three year period reflects the contingency arrangements included in the Joint Core Strategy and smoothes out minor fluctuations in the figures.*

### **Question 29**

**Do you agree that the consequences for under delivery should be:**

- a) **From November 2017, an expectation that local planning authorities prepare an action plan where delivery falls below 95% of the authority's annual housing requirement?**
- b) **From November 2017, a 20% buffer on top of the requirement to maintain a five year housing land supply where delivery falls below 85%?**
- c) **From November 2018, application of the presumption in favour of sustainable development where delivery falls below 25%?**
- d) **From November 2019, application of the presumption in favour of sustainable development where delivery falls below 45%?**
- e) **From November 2020, application of the presumption in favour of sustainable development where delivery falls below 65%?**

*Partially support the tiered housing delivery test on the grounds that greater certainty will reduce appeal procedures. However assessment of delivery should be allowed to take account of local circumstances. Moreover it is considered that a rolling three year period is a more appropriate timescale to measure delivery.*

### **Question 30**

**What support would be most helpful to local planning authorities in increasing housing delivery in their areas?**

- *Waiver the right to appeal process where Local Planning Authority meets the five year supply of housing land*
- *Access to capacity funding on three year rolling programme with priority given to authorities that can demonstrate a good track record of delivery*
- *A more proactive approach by infrastructure providers to align investment and delivery plans with the Local Plan and associated Infrastructure Delivery Plans.*

### **Question 31**

**Do you agree with our proposals to:**

- a) **amend national policy to revise the definition of affordable housing as set out in Box 4?**

*No as it does not take in to any account local limitations including those around local earnings and it put most of its focus on affordable ownership and private sector rents. In relation to the Social /Affordable rented housing whilst this is localised the High discount rates that can be achieved using Right To Buy and the regulations on how supposed 1-4-1 funding is applied will not seriously allow local Housing Providers to replace / increase their stock to meet need. Changes to bring in 'fixed term' tenancies and any future pay to stay changes will only have the effect of hiking up right to buy applications. In addition the 20% below market housing definition is too unsteady to deal with due to*

rents in the private sector having no control over their rise and fall. Therefore, it is not currently sufficient regulation applied to the private sector rent for controlling housing management and rent setting forcing people to look to the local Authorities for housing that has any chance of being within their affordability ranges.

**b) introduce an income cap for starter homes?**

*Partially agree. The proposed income cap is required if Starter Homes are to be treated as affordable housing but the proposed £80,000 income cap is excessively high. It means that people on incomes less than £80,000 will be subsidising people with higher incomes than them to buy houses that could be more valuable than their own. Should the government progress this proposal, it is suggested that the responsibility of setting an income cap fall to the local planning authority taking account of local evidence.*

*The proposed cap will only encourage developers to look for the high end earners, those on 'real' wage limitations that could buy with help will get excluded. In Corby the most common earnings are about £15,000 (average is £33,000 per household) meaning they will never be a target market for the developers who can attract sales from migrating applicants for a growing town. Perhaps there needs to be a policy in place to ensure that all earnings categories are given the opportunity to purchase?*

**c) incorporate a definition of affordable private rent housing?**

*There is no clarity to this suggestion on how it might be done. We could end up with swathes of new private landlords that are not equipped to deal with tenancy management and if there is no cap on the rent setting that takes into consideration the 'real' most common earnings in Corby (or any other town for that matter) then it will not help affordability. Currently the regulations on private sector are not strong enough to prevent rogue behaviour with private landlords, so introducing a whole new set of landlords with no former experience or tightening of regulations could be catastrophic for Homelessness and any resulting legal processes.*

**d) allow for a transitional period that aligns with other proposals in the White Paper (April 2018)?**

*This should always be allowed for but it needs to be clear on what it means and what happens to the backlog of required actions that occurs during that period and what resources are given to it.*

**Question 32**

**Do you agree that:**

**a) national planning policy should expect local planning authorities to seek a minimum of 10% of all homes on individual sites for affordable home ownership products?**

*No. Affordable housing requirement should be based on local evidence.*

**b) that this policy should only apply to developments of over 10 units or 0.5ha?**

*No for the reason set out in 32 a)*

**Question 33**

**Should any particular types of residential development be excluded from this policy?**

*No comment*

**Question 34**

**Do you agree with the proposals to amend national policy to make clear that the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18-219 of the NPPF, together constitute the Government's view of what sustainable development means for the planning system in England?**

*It is not clear what this is trying to achieve as this is already set out in the NPPF.*

### **Question 35**

**Do you agree with the proposals to amend national policy to:**

- a) **Amend the list of climate change factors to be considered during plan-making, to include reference to rising temperatures?**

*Yes.*

- b) **Make clear that local planning policies should support measures for the future resilience of communities and infrastructure to climate change?**

*Yes.*

### **Question 36**

**Do you agree with these proposals to clarify flood risk policy in the NPPF?**

*Yes.*

### **Question 37**

**Do you agree with the proposal to amend national policy to emphasise that planning policies and decisions should take account of existing businesses when locating new development nearby and, where necessary, to mitigate the impact of noise and other potential nuisances arising from existing development?**

*No. NPPF already sufficient for Local Planning Authorities to determine applications on that basis*

### **Question 38**

**Do you agree that in incorporating the Written Ministerial Statement on wind energy development into paragraph 98 of the NPPF, no transition period should be included?**

*No comment.*