Dear Sir / Madam,

CORBY LOCAL PLAN PART 2 – 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 LPP2 Examination Hearing Sessions to discuss matters in greater detail.

The North Northamptonshire Joint Core Strategy (NNJCS) for Corby, East Northamptonshire, Kettering and Wellingborough Councils adopted in July 2016 sets out :-

- the overall spatial strategy ;
- the level of growth and its distribution ;
- strategic site allocations (defined as more than 500 dwellings) and ;
- strategic policies including place shaping requirements and development management policies.

The adopted NNJCS provides the strategic framework for the Corby Local Plan Part 2 (LPP2) so the two Plans are intrinsically linked. The NNJCS is a comprehensive document therefore the LPP2 does not need to re-address issues dealt with in the NNJCS and any local detail set out in the LPP2 should not duplicate policies adopted in the NNJCS.

Housing Requirement & Housing Land Supply (HLS)

The Council should be proactively supporting sustainable development to deliver a significant boost to the supply of housing to meet identified housing needs as set out in the 2019 NPPF. The Council should ensure that in
combination the adopted NNJCS and LPP2 meet the Borough’s housing needs in full as far as is consistent with the 2019 NPPF including identifying key sites critical to the delivery of the housing strategy over the plan period.

As set out in the adopted NNJCS the housing requirement for Corby is 9,200 dwellings (460 dwellings per annum) or if the strategic growth opportunity is included 14,200 dwellings (710 dwellings per annum) for the plan period 2011 – 2031 (see Table 5 : Housing Requirement 2011 – 2031). The housing requirement distribution is set out in Table 6 : Housing Distribution 2011 – 2031 as follows :-

- Corby (identified as a growth town) for 8,290 dwellings (or 13,290 dwellings including the strategic growth opportunity);
- New Village (Little Stanion) for 790 dwellings; and
- Rural Housing for 120 dwellings.

The LPP2 proposes 10 site allocations in Policy 11 : Delivering Housing which are set out in site-specific policies (Policies H1 to H7 & TC1 to TC3). The proposed allocations equates to circa 751 dwellings. The HBF submit no comments on the merits or otherwise of individual non-strategic site allocations and our representations are submitted without prejudice to any comments made by other parties.

Table 7 : Housing Land Supply (HLS) 2011 – 2031 identifies an overall HLS of 12,044 dwellings representing a surplus of +2,844 dwellings against a housing requirement of 9,200 dwellings and a deficit of -2,156 dwellings against a housing requirement of 14,200 dwellings if the strategic growth opportunity is included. It is noted that the Council’s figures for the difference between supply and requirement set out in Table 7 include a shortfall of 37 dwellings between 2011 – 2019 and a 20% buffer.

The HBF support the inclusion of a contingency in the Council’s HLS which should be as large as possible in order to provide maximum flexibility. There is no numerical formula to determine the appropriate quantum of such a flexibility contingency however where a Local Plan is highly dependent upon one or relatively few large strategic sites and / or localities such as in Corby greater numerical flexibility is necessary than in cases where supply is more diversified. The adopted NNJCS Sustainable Urban Extensions (SUEs) and strategic sites allocated at North East Corby, West Corby Little Stanion and Priors Hall (part in Corby) should be complimented by smaller scale non-strategic sites in the LPP2. For the Council to maximise housing delivery the widest possible range of sites by both size and market locations should be chosen to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing
circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice and competition in the land market.

The Council’s housing trajectory is set out in Appendix 1. There appears to be an absence of evidence in the Council’s supporting documentation to justify assumptions on delivery rates, lapses and windfall allowances. It is critical that these assumptions are realistic and supported by parties responsible for the delivery of allocated sites. If any further evidence is forthcoming the HBF may wish to submit additional representations in written Examination Hearing Statements and / or orally during Examination Hearing Sessions.

It is also confusing that the sources of HLS described in Table 7 and the housing trajectory in Appendix 1 are not consistent. It is assumed that HLS sources described as “Additional Sources of Supply” for 700 dwellings in Table 7 comprises “LPP2 Allocations” of 663 dwellings and “Rural Area Additional Sources of Supply” of 37 dwellings as described in the housing trajectory. Similarly it is assumed that HLS sources described as Corby & Rural Area commitments and strategic allocations in the housing trajectory correlate with existing planning permissions and strategic allocations in Table 7 because both total 7,544 dwellings. It is suggested that ambiguity could be removed by a consistent approach to the description of sources of HLS.

Housing Policies

Custom & Self Build

Under the Self Build & Custom Housebuilding Act 2015 the Council has a duty to keep a Register of people seeking to acquire self / custom build plots and to grant enough suitable development permissions to meet identified demand. The NPPG (ID: 57-025-201760728) sets out ways in which the Council should consider supporting self / custom build. These are :-

- developing policies in the Plan for self / custom build ;
- using Council owned land if available and suitable for self / custom build and marketing such opportunities to entrants on the Register ;
- engaging with landowners who own housing sites and encouraging them to consider self / custom build and where the landowner is interested facilitating access to entrants on the Register ; and
- working with custom build developers to maximise opportunities for self / custom housebuilding.

It is noted that Policy 30 of the adopted NNJCS provides support / encouragement for self / custom build schemes and requires a percentage of such plots on SUEs and strategic allocations. The HBF is supportive of proposals to encourage self / custom build for its potential additional contribution to overall HLS such as the first and last paragraphs of Policy 12 : Custom & Self Build which state :-
• Proposals that would make a proportion of serviced dwelling plots available for sale to custom builders or self-builders will be supported where in compliance with other policies of the Local Plan; and
• Communities preparing Neighbourhood Plans will be encouraged to consider the identification of sites for custom and self-build projects within their neighbourhood plan area.

The HBF is also supportive of **Policy 13 – Single Plot Exception Sites for Custom and Self-Build.**

The HBF is not supportive of restrictive policy requirements for the inclusion of self/custom build housing on residential development sites which only change housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. Therefore the HBF object to the second paragraph of **Policy 12** which states :-

• On sites of 20 or more dwellings (excluding schemes for 100% flats or conversions), the local planning authority will seek the provision of serviced building plots to enable the delivery of custom and self-build. In determining the nature and scale of any provision, the Council will have regard to evidence of local need, the nature of the development proposed and the viability of the development.

The provision of serviced plots for self/custom build on residential development sites of more than 20 dwellings should not be sought. This policy requirement seeks to place the burden for delivery of self/custom build plots on developers contrary to national guidance which outlines that the Council should engage with landowners and encourage them to consider self/custom build. The Council’s proposed policy approach should not move beyond encouragement by seeking provision of self/custom build plots on residential development sites of more than 20 dwellings.

All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The Council’s Self & Custom Build Register alone is not a sound basis for setting a specific policy requirement. As set out in the NPPG the Council should provide a robust assessment of demand including an assessment and review of data held on the Council’s Register (ID 2a-017-20192020) which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (ID 57-0011-20160401). The Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on housing sites. It is also possible for individuals and organisations to register with more than one Council so there is a possibility of some double counting. The Register may indicate a level of expression of interest in self/custom build but it cannot be reliably translated into actual demand should such plots be made available. It is understood that there are only 5 entries on the Council’s Register which have demonstrated a local connection and financial solvency so demand is relatively minimal.
The Council’s policy approach should be realistic to ensure that where self / custom build plots are provided they are delivered and do not remain unsold. It is unlikely that the allocation of self / custom build plots on housing sites of more than 20 dwellings can be co-ordinated with the development of the wider site. At any one time there are often multiple contractors and large machinery operating on a housing site from both a practical and health & safety perspective it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. If demand for plots is not realised there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council’s HLS.

Where plots are not sold it is important that the Council’s policy is clear as to when these revert to the original developer. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development. The consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self / custom builders.

As well as on-site practicalities any adverse impacts on viability should be tested. It is the Council’s responsibility to robustly viability test the LPP2 in order that the cumulative burden of policy requirements are set so that most development is deliverable without further viability assessment negotiations and the deliverability of the Plan is not undermined. Self / custom build are exemption from Community Infrastructure Levy (CIL) contributions and affordable home ownership provision as set out in national policy. **Policy 12** may have a detrimental impact upon the level of affordable housing provision achieved on sites of more than 20 dwellings. The Council may wish to adopt an aspirational approach in allocating plots to deliver self / custom build but this should not be pursued at the expense of delivering affordable housing.

There is no justification for the 20 or more dwellings site threshold which means that six allocated housing sites (H1, H5, H6 & TC1 to TC3 (if not 100% apartments)) would be subject to **Policy 12**. The Council’s 160 dwellings windfall allowance is a potential supply of self / custom build plots. This suggests a significant over supply against minimal demand.

The 2019 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). The policy is vague on the nature / scale of provision and recourse if self-builders are not forthcoming. If the policy is to be effective the Council should provide further clarification of its requirements which should be justified by supporting evidence.
It is noted that similar policy requirements for self / custom build plots were found unsound by the Inspectors examining the Broxtowe LPP2 and Rushcliffe LPP2 respectively due to insufficient demand for such provision, no justification for proposed site thresholds and unclear ineffective policy wording (see MM29 to Policy 13 of Rushcliffe LPP2 Schedule of Main Modifications Document for consultation ended on 5th July 2019 and MM28 to Policy 15 of Broxtowe LPP2 Schedule of Main Modifications Document for consultation ended on 9th July 2019).

The second paragraph of Policy 12 should be deleted.

**Specialist Housing and Older People’s Accommodation**

**Policy 30 : Housing Mix and Tenure** of the adopted NNJCS sets out the strategic approach for provision of a mix of dwelling sizes and tenures to meet the housing needs including specialist forms of housing for older people. The adopted NNJCS requires all new homes to meet Nationally Described Space Standards (NDSS) and accessible / adaptable (Part M4(2)) standards. New development on allocated SUEs and strategic sites are also encouraged to make specific provision for specialist housing requirements for older persons including sheltered and extra care accommodation.

The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people’s housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as the elderly without seeking a specific housing mix on individual sites above a certain threshold size. Indeed the housing needs of older people is a diverse sector so the LPP2 should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.

**Policy 15 : Specialist Housing and Older People’s Accommodation** requires residential developments of 50 or more dwellings to include a proportion of the housing designed specifically to meet the identified needs of older households and others with a need for specialist housing. The precise proportion, type and tenure mix will take into account:

- evidence of local need ;
- the scale and location of the site ; and
- the viability of the development.

Retirement housing, supported housing and care homes will be supported provided that retirement housing and supported housing schemes has embedded the HAPPI principles into the design.

The 2019 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). The policy is too vague on the proportion, type and tenure mix of specialist
housing and older people’s accommodation sought for it to be effective. Furthermore there is no justification for the 50 or more dwellings site threshold. It is noted that four allocated sites (H5, TC1 to TC3) would be subject to Policy 15.

The HBF is supportive of the use of best practice guidance such as the HAPPI principles however the use of such guidance should remain voluntary rather than becoming a mandatory policy requirement which would oblige developers to use this tool as a pre-condition for support from the Council for retirement and supported housing schemes and care homes. Indeed the reference to the HAPPI principles in Policy 15 which will be set out as North Northamptonshire HAPPI design criteria in the forthcoming North Northamptonshire Place Shaping Supplementary Planning Document (see para 7.49 of supporting text) conveys development plan status to a document which has not been subject to the same process of preparation, consultation and Examination as the LPP2 contrary to the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations).

Policy 15 should be amended.

Conclusions

For the Corby LPP2 to be found sound under the four tests of soundness as defined by the 2019 NPPF (para 35), the Plan must be positively prepared, justified, effective and compliant with national policy. It is considered that without modifications before submission of the Corby LPP2 for examination Policies 12 and 15 are unsound. It is hoped that the Council will find these representations are helpful in the meantime if any further assistance or information is needed please contact the undersigned.

Yours faithfully
for and on behalf of HBF

Planning Manager – Local Plans