

Rushcliffe Borough Council
Civic Centre
Pavilion Road
West Bridgford
Nottingham
NG2 5FE

HBF 770590

SENT BY E-MAIL AND POST

24 March 2016

Dear Sir / Madam

**RUSHCLIFFE LOCAL PLAN PART 2 LAND & PLANNING POLICIES
DOCUMENT – ISSUES & 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 representations.

The Local Plan Part 2 will set out the non-strategic site allocations and detailed policies for the management of new development in accordance with the strategic framework of the Rushcliffe Local Plan Part 1 adopted in December 2014. Policy 2 of the adopted Local Plan Part 1 proposes a minimum of 13,150 dwellings in Rushcliffe between 2011 – 2028. It is noted that MM1(a) of the Inspector's Final Report on the examination of the Local Plan Part 1 refers to a review of the Plan if the objectively assessed housing needs are found to be materially different therefore it is suggested that the Council confirms that the housing requirement is unchanged. It is also noted that under MM1(b) of the Inspector's Report it is assumed that the Part 2 Plan would be adopted by 2016, which has not happened, the Council should clarify if there are any consequential impacts from the prolonged use of the lower anticipated housing completion rates in the 5 YHLS calculation.

If the Rushcliffe Local Plan Part 2 is not adopted until July 2017 only circa 11 years will remain before the end of the plan period rather than the 15 year time horizon specified in the NPPF (para 157). It is suggested that in order for the Council to positively plan for new housing development and its longer term housing needs there should be a review of the adopted Local Plan Part 1 sooner rather than later and an amalgamation of the Part 1 and 2 Plans into one document as preferred by Government.

The Local Plan Part 2 proposes to allocate greenfield sites on the edge of key settlements at East Leake, Keyworth, Radcliffe on Trent and Ruddington

together with the allocation of sites within these key settlements on previously developed land to meet minimum housing targets of 400 dwellings, 350 dwellings, 400 dwellings and 250 dwellings respectively. It is suggested that the identification and allocation of sites in West Bridgeford should also be considered.

Moreover the Council should consider the meeting of housing needs in other villages. It is noted that the Council proposes to amend the “inset” boundaries of settlements within the Green Belt and to create new “inset” boundaries for other villages. However these proposed boundaries as illustrated on the accompanying maps remain tightly drawn. It is suggested that proposed settlement boundaries should not be drawn too tightly thereby inhibiting the Plan’s flexibility for alternative sustainable developments to come forward if any unforeseen problems occur with existing consents and / or site allocations. Such less tightly drawn boundaries may also provide potential opportunities for self-build / custom build in these localities. It is important that the Council recognises the difficulties of lack of housing supply and unaffordable housing faced by rural communities. 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”*.

Although the HBF would not wish to comment on the merits or otherwise of individual sites proposed for allocation by the Council it is critical that the Council’s assumptions about the availability, suitability, deliverability and viability of these sites are correct and realistic to provide sufficient headroom and flexibility in the overall land supply throughout the plan period. When allocating sites the Council should maximize housing supply via the widest possible range of sites, by size and market location so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some sustainable urban extensions (SUEs) may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else been equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand.

The HBF supports self-build / custom build in principle for its potential additional contribution to the overall housing supply where this is based on a positive policy approach to increase the total amount of new housing development and meet an identified and quantified self-build / custom build housing need. However the HBF is not supportive of a restrictive policy requirement approach for the inclusion of such housing on sites of a specific size. This sort of approach

provides no additionality to land supply but merely changes production from one to another type of builder. There are also practical problems associated with implementing such a restrictive policy including health & safety implications, working hours, length of build programmes, etc. The Council should refer to the East Devon Local Plan Inspector's Final Report which expresses reservations about the implementation difficulties associated with this sort of policy. Therefore it is suggested that any policy to encourage self-build / custom build is subject to viability considerations, specific site circumstances and it is based on evidence of an identified demand for such housing.

It is noted that the Council makes reference to policy requirements on carbon dioxide emissions. It is accepted that the Council can specify the proportion of energy generated from on-site renewables and / or low carbon energy sources but the Council cannot set a local standard for energy efficiency above current Building Regulations. The Deregulation Act 2015 specifies that no additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings should be set in Local Plans other than the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings. The Deregulations Act removed the power of authorities to require residential developments to exceed the energy performance requirements of Building Regulations therefore the Council should not be setting any additional local technical standards or requirements relating to the performance of new dwellings.

The Written Ministerial Statement (WMS) dated 25th March 2015 confirmed 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 proposes that residential development will achieve water efficiency measures of 110 litres per person per day then as set out in the NPPG (ID 56-015) the need for and viability of opting for a water consumption standard higher than that required by Building Regulations should be fully justified. The Greater Nottingham & Ashfield Water Cycle Strategy 2010 is now somewhat dated. If the Council intends to rely upon this evidence to justify any proposed policy requirement the report should be up dated.

With reference to the Council's proposal to implement the higher optional standard of M4(2) adaptable / accessible homes of the Building Regulations the NPPG (ID 56-007 and ID 56-003) confirms such a policy requirement should be justified based on need and viability tested.

The Council should also recognise the likelihood that before the publication of the draft and / or pre submission Local Plan Part 2 the Council may have to incorporate further changes to its proposed policies as a consequence of the Housing & Planning Bill and other recent Government consultations.

For the Rushcliffe 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. The Council should consider the aforementioned responses to this issues and options

consultation in order to avoid preparing a Local Plan which is unsound because it is inconsistent with national policy, not positively prepared, improperly justified and so ultimately ineffective. It is hoped that these representations are of assistance to the Council in preparing the next stages of the Rushcliffe Local Plan Part 2. In the meantime if any further information or assistance is required please contact the undersigned.

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


Susan E Green MRTPI
Planning Manager – Local Plans