Date	**13TH APRIL 2017**
Report Originator	**HEAD OF NORTH NORTHAMPTONSHIRE JOINT PLANNING UNIT**
Title	**"FIXING OUR BROKEN HOUSING MARKET" HOUSING WHITE PAPER**

1. PURPOSE OF REPORT

1.1 The purpose of this report is to inform the Joint Delivery Committee of the Housing White Paper and the proposed changes to national planning policy and to agree a response to the consultation.

2. BACKGROUND

2.1 The Housing White Paper (HWP) *Fixing our broken housing market* sets out the Government's strategy for building more of the right homes in the right places. It was published on 7th February 2017 and consultation closes on 2nd May.

2.2 The HWP is a complex document, running to over 100 pages, including an Annex setting out further detail and 38 consultation questions. It is a mixture of policy announcements and policy proposals.

2.3 It is proposed that the Joint Delivery Committee's response should be combined with that of the Joint Planning Committee (JPC meeting on 27th April) to provide a comprehensive North Northamptonshire (NN) response. This report therefore focuses on those elements of the HWP that have most bearing upon the delivery of the Sustainable Urban Extensions and associated infrastructure.

2.4 Section 3 of this report outlines the relevant content of the HWP and sets out comments and/ or a proposed response (*in italics).* These responses take account of previous feedback to Government. The key points of this, endorsed by the Joint Delivery Committee (JDC) on 31st January 2017, have been that:

- The scale and complexity of housing delivery in NN requires capacity funding at a greater scale and with more permanence that currently exists;
- The planning system is not the primary cause of slower-than-planned rates of delivery. The government should support local authorities that wish to intervene in the market to progress housing delivery at a quicker pace.
- There is an over-reliance on a small number of volume housebuilders to build homes at the right quantity. Opportunities for small and medium-sized builders to grow their market share need to be created.

- The Government should take a more open minded approach to how housing can be delivered across all tenure types and using more tools to help the market meet needs.

3. CONTENT OF THE HOUSING WHITE PAPER

3.1 The HWP begins with an analysis of the problems arising from the shortage of housing; including average house costs that are almost eight times average earnings. It goes on to set out what the Government considers to be a comprehensive approach to tackle failure at every point in the system. It sets out proposals in 4 steps:

1. Planning for the right homes in the right places;
2. Building homes faster;
3. Diversifying the market;
4. Helping people now.

3.2 Key delivery related issues and consultation questions are highlighted below, with JDU comments.

STEP 1: PLANNING FOR THE RIGHT HOMES IN THE RIGHT PLACES

Getting plans in place

3.3 The White Paper sets out measures including to:

- Make sure every part of the country has an up-to date, sufficiently ambitious plan so that local communities decide where development should go (paras 1.6-1.7, A.7-A.11);
- Improve joint working where planning issues go beyond individual authorities, building on the existing duty to co-operate. The Government will use the new £2.3bn Housing Infrastructure Fund to encourage and support collaboration where it is appropriate to do so.
- Improve the availability of data on interests in land and consult on improving the transparency of contractual arrangements used to control land (paras 1.17-1.21, A.29-A.32).

JDU response:

3.4 The JPC report will address local planning issues but it is important to note that NN has a strong record of joint working and has maintained an up-to-date strategic plan. The emphasis that the HWP places on collaborative plan making is therefore welcomed. It puts NN in a strong position to continue to benefit from Government funding, including the new Housing Infrastructure Fund.

3.5 The proposals to make land ownership and interests more transparent are also welcomed as these could help SME builders to acquire land and assist the LPAs in unlocking larger sites where development may have stalled.

Making enough land available in the right places

3.6 The White Paper sets out measures including to:

- Deliver more homes on public sector land including providing a new £45 million Land Release Fund and a allowing LPAs (without the consent of the Secretary of State) to dispose of land with the benefit of planning consent for third parties to develop, where appropriate at less than "best consideration" (paras 1.26-1.27, A.43.A.44).
- Support small and medium sites, including an expectation that local planning authorities will work with developers to encourage the sub-division of large sites (paras 1.30-1.33, A.51-A.55).
- The Annex sets out more detail on improving local authorities' role in land assembly and disposal, seeking views on the potential to use land 'pooling' (as in Germany) to collaborate with landowners in the assembly, servicing and disposal of land and to realise the benefit from the uplift in land values once the site receives planning permission and is made ready for development.

JDU response:

3.7 Proposals to bring forward more homes on public sector land are supported, as are the proposed increased freedoms for LPAs to dispose of land. The detailed arrangements must however contain safeguards to maintain public confidence that this is being done on valid planning grounds.

3.8 The support for small and medium sites is welcomed but further clarity is needed on how LPAs can encourage the sub-division of large site. The SUEs 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 volume house builders to accelerate build-out rates.

3.9 Support for local authorities to play a more active role in land assembly is welcomed. However, the mechanisms described in the HWP rely on land being secured at less than development value, so that the uplift in value arising from the grant of planning permission can be captured. This may be an option at the plan-making stage but is more problematic where land is already allocated for development and/or has planning permission, as is the case for the SUEs.

3.10 The main potential in NN will be where a Council already owns land or wishes to acquire land, either through agreement with the promoter (helping to capitalise a development), or through compulsory purchase to overcome

blockages such as ransom strips or land-banking. In order to realise these opportunities, flexibility will be needed from Government on local authority borrowing limits. Capacity support will also be needed as many local authorities no longer have the required in-house property and legal expertise. This may be either through direct input from HCA/ ATLAS or financial support to enable the necessary expertise to be bought-in.

3.11 Ransom strips are a common problem in achieving coordinated development on large sites, even where there is Local Plan policy requiring development to be 'comprehensively planned'. Guidance and/ or legislation would be helpful in combatting this problem.

A new generation of new communities

3.12 To support the delivery of existing and any future garden communities, the Government will:

- Ensure that decisions on infrastructure investment take better account of the opportunities to support new and existing communities;
- Legislate to enable the creation of locally accountable New Town Development Corporations, enabling local areas to use them as the delivery vehicle if they wish to. This can strengthen local representation and accountability, and increase opportunities for communities to benefit from land value capture; and
- Following the previous consultation on changes to the National Planning Policy Framework, amend policy to encourage a more proactive approach by authorities to bring forward new settlements in their plans, as one means by which housing requirements can be addressed.

3.13 The Government is interested in the opportunities that garden cities, towns and villages might offer for bringing large-scale development forward in ways that streamline planning procedures and encourage locally-led, high quality environments to be created. For example, local development orders or Development Corporations could give broad approval in advance for particular types of development, within an overall infrastructure framework. The Government would welcome views on how this potential can best be exploited.

JDU response:

3.14 The explicit link between infrastructure investment and new and existing communities is welcomed. This is essential to the delivery of the NN Garden Community; comprising 6 major SUEs at 4 closely linked Growth Towns. These SUEs have potential to deliver around 25,000 new homes with supporting jobs and infrastructure. They are the main building blocks for sustainable growth in NN and must remain a focus for infrastructure investment.

3.15 The intention to enable the locally accountable New Town Development Corporations to be set up is noted. This is supported provided that this is a mechanism available to LPAs, rather than something that could be imposed. The NN Councils have a strong record of partnership working to plan and deliver growth and are continuing this through the JPDU.

3.16 The NN Joint Core Strategy (Policy 14) identified the opportunity to create a Garden Village at Deenethorpe Airfield. This is an addition to the housing requirements set out in the plan, which will be delivered through the SUEs and other sites. This policy approach does not allocate the site for housing and is clear that the Garden Village can only go ahead if exemplary standards of infrastructure and design are met (to be tested through preparation of a masterplan and delivery strategy). This keeps land value in check compared to allocated housing sites and ensures that a significant element of value uplift (arising from any future grant of planning permission) will be captured for necessary infrastructure provision. This is an approach which could be replicated on suitable sites elsewhere in the country provided that landowners take a long term view on securing a return on investment.

3.17 In respect of streamlined planning procedures to secure locally-led, high quality environments, it should be noted that Design Codes are in place in all consented SUEs in North Northamptonshire. Developers have advised that these have helped to drive quality and sales e.g. Barratt Homes, Priors Hall Park. Design Codes do take time to develop and set out detailed prescription for the public realm, and principles for each character area, but could have an additional tier which provides more certainty upfront. Given the considerable resource required to do this, it would probably only be in the interest of LPAs to undertake this for special areas i.e. certain plots where a certain quality of type of development is sought. This process would need to be at both plot level and for the streets concerned, either a plot "passport" or a pattern book for streets and buildings.

3.18 Co-ordinating codes could still be done for a Parcel on a SUE, setting out what the design code means for a particular parcel. The use of these Codes is considered to be a much quicker mechanism than the Use of LDO's as it would set out the implication of the Design Code for the specific development parcel.

3.19 It will be important that the Local Planning Authorities have sufficient skills and resources available to undertake this, including landscape expertise, architects, design and drainage.

Strengthening neighbourhood planning and design

3.20 The HWP sets out measures including to:

- Strengthen the importance of early pre-application discussions, make clear that local and neighbourhood plans should set out clear design

expectations, recognise the value of using design standards, and consult on improving energy performance requirements on new homes (paras 1.44-1.50, A.65).
- Make better use of land for housing by encouraging higher densities (paras 1.51-1.53, A.66-A.70).
- Review the Nationally Described Space Standard to ensure greater local housing choice, while ensuring we avoid a race to the bottom in the size of homes on offer (para 1.55, A.72-A.74).

JDU response:

3.21 The emphasis on building good quality homes and reference to the Building for Life (BfL) standard is welcomed. It supports the JCS approach to place shaping, incorporating the principles of BfL12. However, elsewhere within the white paper, there are proposals for approving much smaller homes (see 3.23 below), which appears to take a different direction.

3.22 The White Paper is sketchy about how build standards could be improved in reality. We note that para 1.50 refers to future consultation on improving energy performance. It would be a positive step to improve building regulations to achieve the same objectives that the Code for Sustainable Homes previously set out (to code level four and above) to set us back on course towards zero carbon buildings.

3.23 The JDU has concerns over the proposed review of the use of the Nationally Described Space Standard, which will create uncertainty and delay. The space standards arose from the Government's exhaustive review of housing standards and have subsequently been incorporated into the JCS and supported by Inspectors at a number of appeals.

STEP 2: BUILDING HOMES FASTER (PARAS 2.1-2.52)

Providing greater certainty

3.24 The White Paper sets out measures including:

- Giving local authorities the opportunity to have their housing land supply agreed on an annual basis, and fixed for a one-year period (para 2.9, A.75-A.80).
- Deterring unnecessary appeals by charging a fee.
- Boosting local authority capacity and capability to deliver by allowing local authorities to increase planning fees by 20 per cent 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 per cent for those delivering a given level of housebuilding (para 2.15).
- Making £25 million available for areas planning for more homes in areas of high housing need (para 2.16).

JDU response

3.25 The JPC will respond to the detail of planning measures but, as a general point, it is welcome that the Government recognises the workload generated by the LPAs having to repeatedly defend their 5 year housing supply and to defend speculative appeals. Any practical measures that create a better targeting of planning resources are to be welcomed.

3.26 The freedom for LPAs to increase application fees is welcomed. It is understood that the NN authorities are all likely to take this up. Further details are awaited on the funding opportunity referred to at 2.16.

Ensuring infrastructure is provided in the right place at the right time

3.27 The White Paper sets out measures including to:

- Ensure provision of infrastructure through the £2.3 billion Housing Infrastructure Fund which will be open to bids in 2017 with funding for four years (para 2.19, A.91-A.93)
- Revise the National Planning Policy Framework to make clear the status of endorsed recommendations of the National Infrastructure Commission (para 2.20, A.93) and to expect LPAs to identify the additional housing development opportunities which strategic infrastructure improvements offer.
- Review how utilities companies can be prevented from holding up development (paras 2.23-2.24).

JDU response

3.28 The JDU will work with the Councils and stakeholders to identify opportunities presented by the Housing Infrastructure Fund. NN starts from a good position in this respect, with the well-established joint working arrangements and track record of working with Government and its agencies to overcome barriers to growth (for example the A14 widening around Kettering). The JCS identifies key strategic infrastructure requirements. These will be reviewed through an update on the NN Infrastructure Delivery Plan.

*3.29 The reference to recommendations from the National Infrastructure Commission is something to keep watch on, bearing in mind the NIC's current work in relation to the Oxford to Cambridge Corridor referred to in Item **X** of the JDC's agenda.*

Supporting developers to build out more quickly

3.30 The White Paper sets out measures to:

- Tackle unnecessary delays caused by planning conditions by allowing the Secretary of State to prohibit conditions that do not meet national policy tests, and to ensure that pre-commencement conditions can only be used with the agreement of the applicant
- Roll out the approach piloted by Natural England and Woking Borough Council to streamline the licensing system for habitat management of protected species (para 2.27).
- Review the system for how developers contribute towards infrastructure and affordable housing through Section 106 and the Community Infrastructure Levy, to be published in the Budget on 8 March 2017 (paras 2.28-2.90).
- Pursue measures to address skills shortages in the construction industry (paras 2.31-2.34).

JDU Response:

3.31 The JDU questions the assertion that unnecessary delays are caused by planning conditions. Planning conditions are already required to meet the national tests set out in the NPPF (necessary, relevant, enforceable, precise and reasonable). The extent of conditions attached to the planning permissions for the SUEs reflects the complexity of the developments and the level of information provided by the applicants to support the original application. The alternative to pre-commencement conditions would be additional cost and time spent at the planning application stage.

3.32 The approach to streamlining the licensing system relating to protected species is supported. The JCS contains a similar approach to mitigating the impact of development on the Nene Valley Gravel Pits Special Protection Area. The associated SPA mitigation strategy has been adopted by East Northamptonshire and Wellingborough Councils and has been shortlisted for a national award for environmental planning.

3.33 The JDU supports the Government's intention to examine options for reforming the system of developer contributions. None of the NN LPAs has adopted CIL due largely to concerns that it is less flexible, and likely to collect less infrastructure funding than existing s106 provisions.

Holding developers and local authorities to account

3.34 The White Paper sets out measures including:

- To require more information about the timing and pace of delivery for new housing para 2.36, A.94-A.97).
- To encourage local authorities to consider how realistic it is that a site will be developed, when deciding whether to grant planning permission for

housing, on sites where there is evidence of non-implementation of earlier permissions. (paras 2.39-2.40, A.99-A.102).

- Seeking views on whether an applicant's track record should be taken into account in determining applications for housing.
- Considering options for shortening the timescales for developers to implement a permission from three years to two years, except where a shorter timescale could hinder the viability or deliverability of the scheme (para 2.41, A.103-A.104).
- 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 LPA can withdraw planning permission for the remainder of the site.
- Supporting councils to use compulsory purchase powers to support build out of stalled sites, with a more proactive role from the HCA (paras 2.44-2.46).
- 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 number of those suggested are needed (paras 2.47-2.50, A109-A.117).

JDU response:

3.35 *The JDU agrees that it would be helpful for a planning application to set out the estimated start date and build out rate for proposals for housing, and that this information should inform the Authorities' Monitoring Report (AMR) However, it should be noted that the build out rates, especially for larger developments, are usually very different to those quoted by developers during the planning application stage and do not provide a reliable basis to calculate five year housing land supply assessments. A standard approach to calculating build out rates, based on locally available evidence (derived from sites within a locality), would be useful to help avoid developers either presenting an unrealistically positive picture (in support of an allocation/ permission) or unnecessarily pessimistic picture (to ward off the prospect of an LPA intervening).*

3.36 *The JDU agrees that developers should subsequently 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. This should be published as part of Authority Monitoring Reports.*

3.37 *It is difficult to see how LPAs will be able to take account of the deliverability of a site in deciding whether to grant planning permission on a specific site (as opposed to in plan-making where this can be a factor in choosing between competing sites). This is essentially a commercial judgement on the part of an applicant and could lead to lengthy legal arguments and planning appeals if an LPA refused permission on this basis for an otherwise acceptable development. In particular, 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.*

3.38 Similarly, the JDU does not consider that an applicant's track record of delivering previous, similar housing schemes should be taken into account by LPAs when determining planning applications. 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 sold on to other parties for development.

3.39 The JDU shares the Government's wish that development should start as soon as possible after planning permission is granted. The proposal to shorten the timescales for developers to implement permission for housing development from three years to two years may help to focus efforts on bringing forward small sites but is not supported in relation to SUEs, where 3 years is often needed for complex reserved matters to be approved. Developers would simply need to apply for extensions of planning permission, creating further work for them and the LPA's, and confusion for local communities.

3.40 The proposals to amend legislation to simplify and speed up the process of serving a completion notice are supported in principle, dependent on local circumstances and the discretion of the LPA. The JDU supports the proposal to remove the requirement for the Secretary of State to confirm a completion notice before it can take effect. It will be important that LPAs will be properly resourced to allow them to undertake this process.

3.41 The JDU supports the proposal to encourage more active use of compulsory purchase powers to promote development on stalled sites for housing. In order to pursue this, funding will be needed from the HCA or flexibility given on local authority borrowing limits. Capacity support will also be needed as many local authorities no longer have the required in-house property and legal expertise. This may be either through direct input from HCA/ ATLAS or financial support to enable the necessary expertise to be bought-in.

3.42 The JPC will be responding to the detail of the proposed housing delivery test. The JCS already contains a range of measures in its monitoring framework to respond to under-delivery and local circumstances. The work of the JDU in identifying and resolving barriers to delivery of the SUEs is critical.

STEP 3: DIVERSIFYING THE MARKET

3.43 The White Paper sets out measures including:

- 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 our Accelerated Construction programme that can build homes more quickly than traditional builders;
- Encouraging more institutional investors into housing, including for building more homes for private rent, and encouraging family friendly tenancies (the proposed revised definition of affordable housing at page 100 includes Affordable private rent housing);
- Supporting housing associations and local authorities to build more homes; and
- Boosting productivity and innovation by encouraging modern methods of construction in house building.

JDU response:

3.44 This section of the HWP is largely a statement of Government policy and there are no direct consultation questions set out in the Annex apart from in relation to the definition of affordable housing (question 31). It is however considered important to set out some broad comments for inclusion in the JDU's response on the HWP.

3.45 The JDU welcomes the recognition that the key challenge is the supply of new homes across all tenures rather than solely about access to home ownership, and that this can only be addressed through action involving a range of players including councils.

3.46 The JDU welcomes the support for small and medium-sized builders and custom builders through the Home Building Fund and Accelerated Construction programme (paras 3.8-3.9). The JPU has engaged the Government's Custom and Self-Build Task Force to provide advice, initially through the Garden Village project. The JDC will be updated on this work.

3.47 Affordable private rent may be appropriate for meeting the needs of some households but should not be at the expense of other forms of affordable housing that meet the needs of lower income households. The appropriate mix of typologies from within the proposed definition of affordable housing should be determined in the context of local need. Existing planning obligations must not be overridden by the new definition of affordable housing which will make it more challenging to provide affordable rented housing.

3.48 The JDU welcomes the active role supported for local authorities in building housing through vehicles such as local housing companies and joint ventures. However, the HWP fails to address factors constraining the building of affordable rented homes at scale and pace, including the HRA debt cap, the 1% rent reduction and the need for more flexibility on the use of capital receipts. The insistence that tenants are offered similar rights to those in council housing, including the Right to Buy (para 3.28), may also constrain delivery.

3.49 The JDU supports the ambition to modernise the housebuilding sector and promote faster methods of construction, including through the Accelerated Construction Programme and Home Builders Fund (paras 3.37-3.40) . The scale of development planned in NN offers major opportunities to promote this type of manufacturing and it is proposed that the JDU should work with the HCA and SEMLEP to identify how this can be taken forward.

3.50 The HWP (para 3.33) indicates that the Government is interested in the scope for bespoke housing deals with authorities in high demand areas, which have a genuine ambition to build. These deals must result in additional housing delivery and would look at the alignment of decisions on infrastructure and housing at higher spatial levels, including through joint local planning. It is proposed that the JDU should explore this concept further with HCA to see what potential it offers for an ongoing commitment to resourcing the delivery of growth in NN.

STEP 4: HELPING PEOPLE NOW

3.51 The White Paper sets out measures including:

- Continuing to support people to buy their own home – through Help to Buy and Starter Homes;
- Helping households who are priced out of the market to afford a decent home that is right for them through our 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; and
- Doing more to prevent homelessness by supporting households at risk before they reach crisis point as well as reducing rough sleeping.

JDU response

3.52 This section of the HWP is largely a statement of Government policy and there are no direct consultation questions set out in the Annex apart from in relation to the definition of affordable housing (question 31).

3.53 A welcome shift from the Government's previous proposals is that, rather than a mandatory requirement for starter homes (which was likely to have been 20%), the intention is now to amend the NNPF to introduce a clear policy expectation that housing developments of over 10 units or 0.5ha should deliver a minimum of 10% affordable home ownership. The HWP states that It will be for councils to work with developers to agree the mix of starter homes,

rent to buy, shared ownership or other products (para 4.17, A.123-129). Starter homes will also be subject to a 15-year repayment taper so that when the property is sold, some or all of the discount is repaid (para 4.15).

3.54 The revision of the starter homes initiative is a positive move as the JPC has previously made the case that starter homes will meet only a small part of housing needs in NN (households with an income of up to £80,000 will be eligible). It would be preferable not to have 10% specified in the NPPF but if the Government pursues this approach, there will at least be scope to negotiate in the light of local circumstances. Existing planning obligations, particularly on the SUEs must not be overridden by the new definition of affordable housing which will make it more challenging to provide affordable rented housing.

4. CONCLUSION

4.1 The HWP is a large and complex document that brings together Government thinking on a wide range of housing related issues, some of which have been consulted on over the last year or so. It is a mixture of policy announcements and policy proposals.

4.2 This report has highlighted those aspects of the HWP that have most bearing upon the delivery of the Sustainable Urban Extensions and associated infrastructure. It is recommended that the proposed JDU responses set out in this report are endorsed by the JDC. These can then be combined with the Joint Planning Committee's broader consideration of planning issues to provide a comprehensive NN response (including answers to specific consultation questions) ahead of the 2nd May deadline.

4.3 Overall, there is considered to be a lot to support in the HWP, which is frank about the scale of the housing problems facing the country, and clear about the causes. Elements of the HWP respond to the key messages previously endorsed by the JDC (see paragraph 2.4 above). In particular:

- It recognises the need to boost local authority capacity and capability to deliver. The freedom to increase planning fees by 20% will help and the HWP flags other potential sources of support including the prospect of bespoke housing deals with authorities in high demand areas, which have a genuine ambition to build. The recent award of Large Sites Capacity funding to the JDU for 2017/18 is strongly welcomed but it would be more helpful if longer term (say three year) funding deals could be agreed to give certainty to LPAs to plan, recruit, and build lasting interventions.

- The HWP supports local authorities that wish to intervene in the market to progress housing delivery at a quicker pace, including encouraging greater use of compulsory purchase orders. Arguably these measures do not go far enough as the tools available to hold developers to account for slow delivery are limited.

- There is genuine support for small and medium-sized builders (including custom and self-builders) to grow their market share so that the country is less reliant on small number of volume housebuilders to build homes at the right quantity.

- The Government has changed tack to recognise that a strategy that focuses just on home ownership isn't enough, and that everyone, including councils, have a role to play in fixing the broken housing market.

4.4 There are clearly areas where the proposals in the HWP can be improved and the JDU's responses identify these. However, it is recommended that the overall approach should be broadly supportive; stressing that NN, with its well established joint planning and delivery arrangements, is ideally placed to work with the Government and its agencies to meet the challenges that the HWP sets out.

5. RECOMMENDATION

5.1 It is recommended that the Joint Delivery Committee endorses the JDU's response to the Housing White Paper as set out in this report and that this is combined with the response of the Joint Planning Committee to provide North Northamptonshire's joint response.

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