Dear Sir / Madam,

**South Northamptonshire Part 2 Local Plan.**

**Consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.**

**Representations on behalf of Grand Union Housing Ltd.**

CC Town Planning have been appointed by Grand Union Housing (‘the client’) to provide town planning consultancy services in respect of their land interests within South Northamptonshire.

The following correspondence is submitted in response to the submission version of the South Northamptonshire Council (‘SNC’) Part 2 Local Plan (‘LP’) which has been published for the purposes of public consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

To assist you this letter is accompanied by the following;

- A completed SNC representation form for the South Northamptonshire (Part 2) Local Plan Draft Submission (Regulation 19) Consultation.

To provide some background about the client, Grand Union Housing is an innovative and leading provider and developer of affordable housing and related services across Bedfordshire, Buckinghamshire and most notably Northamptonshire. Since its formation in 2008 the Group has established itself as a major operator which currently manages more than 12,000 affordable properties.

The Group offers a range of tenures and home types ranging from fixed term tenancies and starter tenancies at social or affordable rates all the way through to shared ownership and market rental properties.

Grand Union Housing are a Registered Provider and, as per all housing associations, are regulated by the Homes and Communities Agency. Therefore, the Group must operate within a prescribed framework set by the Government and they regularly review their operations to ensure absolute compliance with the HCA’s 2015 guidance.
We have now had chance to review the LP2 consultation document in the context of our client’s operations, most notably in regard to their interests in the village of Hartwell, and it is hoped that some of those points herein will be of use.

South Northamptonshire Part 2 Local Plan.

The following seeks to provide a pertinent response to those salient points which have been highlighted by the client during their assessment of the consultation document. Our clients representations provide a general commentary of the housing delivery policies of the plan, in addition comments are providing on the categorisation of Hartwell given our clients interest in land within that village.

The client welcomes the acknowledgement, as set out within the LP2’s vision, that at the end of the plan period there will be a wider choice of homes to meet locally identified needs. Whilst it is anticipated that housing growth will be delivered in a sustainable manner, it is considered that to ensure this prevails, the strategy needs to rightly acknowledge that housing needs exist within the rural area which may not necessarily be picked up within a housing needs survey.

The Settlement Hierarchy correctly acknowledges the sustainability credentials of Hartwell which is categorised as a Secondary Village (Category B). It is however considered that the removal of the proposed ‘categories’ from this element of Policy SS1 would be beneficial. Whilst we are aware of the evidence base which exists, it is considered that the sub-categories within Section C of the Settlement Hierarchy are overly onerous, particularly given that the policy states ‘Secondary villages (A) are likely to be more sustainable for limited development’. Therefore, to ensure the effective application of the strategy it is suggested that the categories be removed from this element of the policy and site suitability be assessed on a site by site basis through the development control process.

Notwithstanding our longstanding issue with Policy R1 of the West Northamptonshire Joint Core Strategy serving as a ‘cap’ rather than a ‘target’ figure, it is considered that the policies within the emerging LP2 will provide the much-needed flexibility to allow for such development as and when it is required. Therefore, at the outset, the approach to residential development in the rural area is considered positive and importantly recognises that appropriate growth is key to increasing the vitality, viability and longer-term sustainability of such areas, not just within South Northamptonshire, but across West Northamptonshire as a whole.

Policy LH1 (Section 3) sets a sound and flexible approach to dealing with residential proposals outside of, but adjacent to existing village boundaries. Furthermore, the cross references to Policies LH2, LH3, LH4 and LH5 are important to ensuring the development in rural areas is not wholly constrained.

In regard to the content of Policies LH2-5, it is considered that the detail within each policy sets a suitable strategy to enable the delivery of residential development to meet those needs which will inevitably be identified through periodic revisions to the evidence base over the course of the plan period.

However, in specific regard to Policy LH2, our client does have some concerns in respect of the second part of this policy and the three adjoining criteria (2i-iii). In regard to Criteria i it is considered there may be issues arising from the future availability of brownfield land to accommodate starter homes in locations where there are those with an identified need. Additionally, in respect of Criteria ii, in the majority of cases market housing will be required to facilitate the delivery of starter homes. Therefore, to ensure that any future needs for starter homes can be met, Criteria i
should be removed and Criteria ii revised to ensure that there can be an appropriate level of return to the land owner in order to incentivise them to release sites for development.

Policy LH3 seeks to provide a basis for the determination of planning applications for entry level and single plot exception sites. In line with the client's commentary in regard to the settlement hierarchy, it is considered that those proposed revisions should be carried through to Section 1 of Policy LH3 which should be revised to recognise that local housing needs may exist in Secondary Villages (B). This would allow for the delivery of exception sites in the specific locations where housing needs are identified through housing needs surveys.

In regard to housing needs surveys the client notes with interest the content of Para 4.4.3 which precedes Policy LH2 and LH3. Whilst we reserve the right to comment on the content of the forthcoming Housing SPD, to ensure the success of the LP2 at the point of adoption, some initial commentary should be included within to the LP2 to provide clarity on the evidence required to demonstrate that needs exist. Clarification is also required as to how such evidence will be obtained, whether this be from the Council, the Applicant or a third-party rural housing enabler who is a specialist in obtaining such advice. Through allowing applicants to directly appoint an appropriately qualified individual to undertake a housing needs assessment, the Council would be pro-actively ensuring the meeting of rural housing needs at the earliest opportunity. There is a current lack of up to date evidence in relation to the level of housing need within many settlements in the District. If evidence of housing need provided by an Applicant is not accepted as representing need then there is a significant risk that the affordable housing needs of the District will not be met.

Whilst it is considered that the Council's approach to housing delivery in the rural area, as set out within the LP2, is a positively prepared strategy which is justified on the basis of an appropriate and robust evidence base, it is the client's opinion that the content of those aforementioned elements could be revised to ensure the effective implementation of the document.

Notwithstanding the points raised above, the client is in agreement that the LP2 presents a suitable strategy, when assessed against the reasonable alternatives, which is both deliverable and consistent with national policy. Therefore, against the backdrop of our client’s land and property interests, the LP2 is considered both legally compliant and sound in its content.

Enclosed with this covering letter are the requisite forms and a site location plan which clearly delineates the extent of that land under the control of our client. It is urged that both this submission the enclosures and previous submissions are read together in their entirety, we will of course provide you with any further relevant information should require it (subject to availability).

If you have any questions on the above or need any further information, then please do not hesitate to contact us via any of those channels listed. If you could confirm receipt of this letter by return it would be greatly appreciated.

I look forward to hearing from you.

Yours sincerely,

Ross Middleton BA (Hons) MA MRPI
Principal Planning Consultant
Representation form for the South Northamptonshire (Part 2) Local Plan Draft Submission (Regulation 19 consultation)

South Northamptonshire Council is preparing a Part 2 Local Plan for the District which will supplement the West Northamptonshire Joint Core Strategy and will replace Saved policies in the South Northamptonshire District Local Plan 1997; it will cover the period up to 2029. This stage is the Draft Submission Local Plan Regulation 19 and is the version of the plan that the Council intends to submit to the Planning Inspectorate.

This form should be used to make representations on the South Northamptonshire (Part 2) Local Plan Draft Submission which has been published.

An electronic version of the representation form is available at: https://www.surveymonkey.co.uk/r/South_Northamptonshire_Local_Plan_reg19

Under new Data Protection regulations (GDPR) South Northamptonshire Council needs to inform you of the reasons why we are capturing your data and what we will do with your data. Any personal data collected and/or processed will be dealt with in accordance with Data Protection Legislation and the Council’s Data Protection Policy. Data is held securely and accessed by, and disclosed to, only individuals where relevant to this policy/procedure.

View privacy notice: https://www.southnorthants.gov.uk/privacy-and-cookies

Please note that it is not possible for representations to be considered anonymously. Representations will be published on the consultation website and included as part of the submission to the Inspector. Address and contact details will be removed from published responses.

I agree to the Council collecting my personal data so that they can process my reply to the South Northamptonshire Council (Part 2) Local Plan Draft Submission Regulation 19.

[ ] Yes (please tick)
Please complete and submit by 12 noon on Friday 16 November 2018. Responses received after this time will not be accepted.

This form has two parts:

Part A  Personal details
Part B  Your representation (s). Please fill in a separate sheet for each representation you wish to make

Part A  Personal Details

1. Are you making this representation as? (Please tick as appropriate)
   
a) Resident or member of the general public  
b) Local Authority or Town/Parish Council  
c) Landowner  
d) Agent/Consultant (on behalf of)  
e) Other organisations; please specify:

   

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<td>Title</td>
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<tr>
<td>First name</td>
<td>ROSS MIDDLETON</td>
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<tr>
<td>Job title (where relevant)</td>
<td>PRINCIPAL PLANNING CONSULTANT</td>
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<td>Organisation (where relevant)</td>
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**Part B Your Representation**

**Please use a separate sheet for each representation**

Please note all comments will be made publically available. If you do not have sufficient space in the box please continue on a separate sheet or expand the box.

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<tr>
<th>2. Do you consider the South Northamptonshire (Part 2) Local Plan to be legally compliant</th>
<th>YES</th>
<th>NO</th>
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<td>✓</td>
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If **NO**, is this because it is:
*(please tick all that you think apply)*

- Not prepared in accordance with the Local Development Scheme
- Not prepared in accordance with the Statement of Community Involvement
- Not consistent with the regulatory requirements for consultation
- Not compliant with the Duty to Co-operate
- Not accompanied by a compliant Sustainability Appraisal

2 (1) Please give details of why you consider the South Northamptonshire (Part 2) Local Plan Draft Submission document is not legally compliant. Please be as precise as possible.
3. Do you consider the South Northamptonshire (Part 2) Local Plan to be sound? | YES | NO
---|---|---
3 (1) If NO, is this because it is: (please tick all that you think apply)
- Not positively prepared
- Not justified
- Not effective
- Not consistent with national policy

4. To which part of the Local Plan does this representation relate?

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<th>Paragraph number</th>
<th>Policy number</th>
<th>Policies Maps</th>
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4 (1) Please set out the changes that you consider are necessary to make the South Northamptonshire (Part 2) Local Plan Draft Submission document legally compliant and/or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

THE CLIENT CONSIDERS THE STRATEGY TO BE SOUND, HOWEVER PLEASE FIND THEIR ADDITIONAL COMMENTARY ATTACHED
Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

5. If your representation is seeking a change, do you consider it necessary to take part and speak at the examination hearing (s) if invited to do so by the Inspector?

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<th>No, I do not wish to participate at the oral examination</th>
<th>Yes, I wish to participate at the oral examination</th>
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6. If you wish to take part at the oral part of the examination, please outline why you consider this to be necessary (please note the inspector will determine who will be invited to be heard at the examination hearing (s)).

7. Please tick a box if you wish to be notified of further progress of the Local Plan. (Please tick all that apply).

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<th>When the South Northamptonshire (Part 2) Local Plan has been submitted for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended)</th>
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<td>When the report of any person appointed to carry out an independent examination of the South Northamptonshire (Part 2) Local Plan is published</td>
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<td>When the South Northamptonshire (Part 2) Local Plan has been adopted</td>
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<td>Other (please specify)</td>
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8. Signature   Date  14/10/2018

Thank you for taking the time to complete the form.

Please return it to:

**Email:** LocalPlanConsultation@southnorthants.gov.uk

By post or by hand to:

Planning Policy Team
South Northamptonshire Council
The Forum
Moat Lane
Towcester
NN12 6AD