Dear Sirs,

South Northamptonshire Local Plan Part 2 Pre-Submission Consultation

Thakeham Homes Ltd are submitting representations to the South Northamptonshire Local Plan Part 2 Pre-Submission Consultation (LPP2) (Regulation 19). Thakeham Homes are housebuilders based in Sussex, with a proven track record of delivering high quality, sustainable schemes across the south east.

The purpose of the Regulation 19 consultation is to establish whether the plan is legally compliant, sound, and if it complies with the duty to co-operate.

The revised NPPF, released on 24 July 2018, explains that the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019. As the Local Plan will be submitted after this date, these representations are therefore prepared in the context of the revised NPPF.

The revised NPPF (paragraph 35) explains that to be found ‘sound’ the plan should be:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
• Effective – deliverable over the plan period, and based on effective joint working on
cross-boundary strategic matters that have been dealt with rather than deferred, as
evidenced by the statement of common ground; and
• Consistent with national policy – enabling the delivery of sustainable development in
accordance with the policies in this Framework.

Spatial Distribution & Housing Land Supply (HLS)

Policy S3 of the adopted West Northamptonshire Joint Core Strategy (JCS) Local Plan Part 1
sets out for South Northamptonshire an Objectively Assessed Housing Need (OAHN) of 6,318
dwellings and a housing requirement of 7,173 dwellings (excluding Sustainable Urban
Extensions in Northampton Related Development Area).

The adopted JCS confirms that in South Northamptonshire housing delivery will be measured
and reported against both the OAHN and the housing requirement. For the purpose of
calculating the 5-year housing land supply (HLS), the OAHN will be used but for the avoidance
of any doubt appropriate numbers of planning permissions will be granted to meet the housing
requirement figure in Policy S3. In South Northamptonshire the adopted JCS spatial strategy
directs strategic growth to Brackley (about 2,160 dwellings), Towcester (about 2,560 dwellings)
and the rural areas (about 2,360 dwellings). The LPP2 will establish a local strategy for the
settlements and countryside across South Northamptonshire in accordance with the adopted
JCS.

Currently South Northamptonshire’s overall HLS is 7,024 dwellings comprising of 3,098
completions between 2011 and 2018 and existing commitments for 3,926 dwellings over the
remaining plan period 2018 – 2029. Although there is a resultant deficiency of 146 dwellings
between the adopted housing requirement and the overall HLS no housing site allocations are
proposed in the LPP2.

In this regard, it should be noted that the adopted JCS (paragraph 5.25) states that the South
Northamptonshire housing need figure should be regarded as a minimum. In addition, it should
be noted that housing delivery in the Northampton Related Development Area (NRDA) has
been poor, resulting in significant housing shortfalls and no 5 YHLS in Northampton Borough
Council.

The Council’s overall HLS should therefore:

a) address the deficiency of 146 dwellings between the adopted housing requirement and
the overall HLS;

b) provide some contingency in order to provide flexibility to adapt to change as well as
choice and competition in the land market; and

c) address the historic delivery shortfalls in the NRDA.

The Council also needs to recognise the affordability difficulties faced by rural communities in
the area. The median house price to median earnings affordability ratio in South
Northamptonshire has more than doubled in the last 20 years; from 4.92 in 1997 to 10.30 in
2017. Whilst 72% of the population live in the rural areas and 23% of the population live in Brackley & Towcester, the JCS spatial strategy directs strategic growth of 4,810 dwellings (67% of the overall HLS) to Brackley & Towcester and only 2,360 dwellings (33% of the overall HLS) to meet local needs to the rural area.

The proposed distribution of housing should meet the housing needs of both urban and rural communities. In this regard, the revised NPPF confirms that “in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs” (para 77) and concludes that “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services” (para 78).

Conclusion

In conclusion, we consider that an increase in housing land supply is required if the plan is to be consistent with National policy and therefore ‘sound’ with respect to the NPPF.

We trust that these representations will be useful and clear, and we would be grateful for confirmation of receipt of our submission.

In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully,

Chris Geddes
Senior Planning Manager