Representations to the South Northamptonshire Local Plan Part 2

Submitted by Persimmon Homes Midlands

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Persimmon Homes Midlands, 3 Waterside Way, Bedford Road, Northampton NN4 7XD
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1.0 INTRODUCTION

1.1 These representations have been prepared by Persimmon Homes Midlands to provide a response to the South Northamptonshire Part 2 Local Plan Draft Submission (Regulation 19) submission.

2.0 POLICY SS1: THE SETTLEMENT HIERARCHY

Summary: While Persimmon supports Policy SS1 in that it appropriately identifies Nether Heyford and Paulerspury as sustainable settlements, Persimmon objects to the introduction of a two-tiered Secondary Service Village category and the placement of Harpole in the Secondary Service Village (B) category. The approach used in formulating the settlement hierarchy is unsound as it out of step with that envisaged in Policy R1 of the WNJCS 2014. The settlement hierarchy and the evidence that underpins it should be reconsidered with appropriate weighting given the proximity of settlements to main urban areas and the quality of public transport connections to those areas.

2.1 Persimmon generally supports the identification of Nether Heyford, Pottersbury, and Harpole as sustainable settlements capable of accommodating new development. However, in order to be sound the settlement hierarchy set out in Policy SS1 needs to be fundamentally reconsidered.

2.2 The usefulness of identifying a settlement hierarchy in a plan which makes no housing allocations is questionable. As set out in Section 3 and 4 below, the Part 2 Local Plan should be addressing the persistent shortfall in the Northampton Related Development Area (NRDA) and stimulating the delivery of affordable homes towards the targets identified in the West Northamptonshire Joint Core Strategy 2014 (WNJCS). The settlement hierarchy should be a tool to identify, among other things, which rural settlements are closest to and have the best connections to Northampton and which settlements have sufficient sustainability credentials and suitable land for new market and affordable homes.

2.3 Persimmon objects to the approach which has seen an additional tier introduced in the settlement hierarchy (Secondary Villages B) because this is plainly not consistent with the Policy R1 of the WNJCS 2014 (the parent plan) which sets out a three tier hierarchy for the rural area – Primary Service Villages, Secondary Service Villages, and Other Villages. Furthermore Persimmon objects to the classification of Harpole in that tier because this is clearly a sustainable, good size village in close proximity and with good public transport links to Northampton.

2.4 We have found it extremely difficult to pin down what exact evidence the Council has relied on in the formulation of its settlement hierarchy because there is no part of the website which clearly lists the evidence base documents intended for submission to the Secretary of State. We have noted that Appendix 4 of the plan refers to the settlement hierarchy evidence dated 2016 but of course that evidence pre-dates the decision to introduce an
additional tier in the settlement hierarchy and the decision to place certain settlements in that tier.

2.5 The 2016 settlement hierarchy evidence is critically flawed in several respects in that it does not follow the approach to settlement classification envisaged by Policy R1 of the WNJCS 2014. While it is noted that the factors in Policy R1 were not considered to be an exhaustive list, the methodology of ranking various settlements has not taken sufficient account of Policy R1 or paragraph 55 of the NPPF 2012 in terms of the ability of larger settlements to support smaller settlements nearby.

2.6 The weighting criteria used in the undated “Settlement Hierarchy in South Northamptonshire” paper heavily favours the presence of a secondary school, GP surgery, or a primary school. These are “most important” whereas the ability to reach an urban area by sustainable transport and the proximity to an urban area is considered to be “very important” or as an “other consideration”, respectively. Double the number of points are awarded for a “most important” facility than public transport to an urban area. This is flawed on its face since settlements with good public transport can be used to access “most important” facilities or other facilities such as employment or shopping with ease.

2.7 At paragraph 16.10 of its supporting text the WNJCS 2014 lists public transport, among other facilities, as a “most important” service while the Council’s appraisal of settlements lists it as a “very important” facility which attracts only half the weight of a “most important” facility. Even though this is supporting text and does not have the force of policy, Policy R1 itself identifies a number of factors to be addressed in the rural settlement hierarchy which appear to be completely absent from the assessment.

2.8 Criterion 4 of Policy R1, for example, refers to evidence of local needs for housing (including market and affordable housing) as a factor to address. There does not appear to have been any consideration of affordable or market housing need by village. This is all the more important given the evidence of unaffordability in South Northamptonshire and the under-delivery of affordable homes against the targets in the WNJCS 2014. Criterion 2 refers to opportunities to retain and improve the provision and enhancement of services critical to the sustainability of settlements. Again, there does not appear to have been any consideration in the settlement hierarchy of how additional homes can facilitate the delivery of new services and support existing services.

2.9 In the case of Harpole the Settlement Hierarchy Matrix states that the settlement does not have a pre-school. However, the settlement does in fact have a pre-school located off of School Lane such the overall score of Harpole has been understated by at least 5 points. When appropriate weight is attributed to Harpole’s proximity and connections to Northampton as a “most important” criterion, as originally envisaged by the WNJCS, it is clear that Harpole accruces sufficient points to sit in the Secondary Service Village (A) category.

2.10 The distinction between two categories of secondary service villages should be deleted as it is not supported by clearly stated policy in the WNJCS thereby rendering it unsound. The
weighting used in the assessment of settlements is similarly inconsistent with the WNJCS and contrary to the principles of sustainable development. The presence of regular bus services to urban areas and proximity to urban areas should be given full weight as a “most important” criterion along with the presence of schools and a GP surgery. The settlement hierarchy should be reconsidered along these lines.

3.0 THE NRDA & THE WNJCS

Summary: The Part 2 Local Plan as a whole is not sound or as it does not incorporate a policy response to stalled housing delivery in the NRDA. In order to address this deficiency and ease the shortfall of housing in the NRDA, the plan should allocate suitable and deliverable sites in villages with good connections to Northampton.

3.1 It is noted that the Council contends that its housing land supply for the rural area is healthy and that it will meet identified housing need in rural area over the remaining plan period through those sites already committed. However, the Part 2 LP does not cover just the South Northamptonshire rural area. It relates to the entire administrative area of South Northamptonshire “including areas identified within the WNJCS as being required to meet Northampton’s needs” (see paragraph 1.1.1 of the supporting text).

3.2 The West Northamptonshire Joint Core Strategy (2014) (WNJCS 2014) allocated certain parts of South Northamptonshire’s administrative area for Sustainable Urban Extensions (SUEs). These allocations along with the Northampton fringe sites Daventry District plus Northampton Borough Council’s administrative area, form part of the Northampton Related Development Area (NRDA).

3.3 Paragraph 1.1.19 of the supporting identifies the issue of stalled housing delivery in the NRDA as a Duty to Cooperate (DtC) matter which needs to be formally resolved. Despite this the same paragraph confirms that the Part 2 Local Plan “no longer takes formal policy approach” to the issue of stalled housing delivery in the NRDA. According to the Memorandum of Understanding (MoU) between the West Northamptonshire councils which will be submitted in support of SNC’s Part 2 LP, the preference is to defer dealing with delivery issues in the NRDA to the review of the WNJCS which will commence this year but which, optimistically, will not be adopted until 2022. The WNJCS itself contained a commitment to a review which would see new strategic policies adopted by 2020. This will not occur.

3.4 When housing delivery is looked at for West Northamptonshire as a whole, there is a significant downward trend as summarised in Table 1 below. This is in spite of a “stepped” housing requirement in the WNJCS 2014. Given that both Daventry District Council and South Northamptonshire Council are reporting healthy housing delivery and supply in their administrative areas excluding their parts of the NRDA, it is evident that this issue is almost completely a result of unmet meet from Northampton.
Table 1 Housing Delivery in NRDA against WNJCS Requirement

<table>
<thead>
<tr>
<th>Monitoring Year</th>
<th>Need</th>
<th>Actual Delivery</th>
<th>Difference/Surplus</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011/12</td>
<td>872</td>
<td>872</td>
<td>0</td>
</tr>
<tr>
<td>2012/13</td>
<td>840</td>
<td>840</td>
<td>0</td>
</tr>
<tr>
<td>2013/14</td>
<td>1,434</td>
<td>1,432</td>
<td>-2</td>
</tr>
<tr>
<td>2014/15</td>
<td>1,864</td>
<td>1,599</td>
<td>-265</td>
</tr>
<tr>
<td>2015/16</td>
<td>2,239</td>
<td>1,831</td>
<td>-408</td>
</tr>
<tr>
<td>2016/17</td>
<td>2,593</td>
<td>2,326</td>
<td>-267</td>
</tr>
</tbody>
</table>

3.5 Some SUEs in the NRDA have been taken forward rapidly by their respective promoters, others (particularly those in South Northants’ boundaries), have been very slow to materialise. While it is not the place of the Part 2 local plan to revisit the spatial strategy in the WNJCS, the WNJCS 2014 has sufficient flexibility to enable Part 2 local plans to boost housing delivery through making further allocations outside of the NRDA but in places with good connections to Northampton.

3.6 Policy S4 (Northampton Related Development Area) of the adopted WNJCS 2014 states that apart from SUEs and development within NBC’s boundaries, “Additional development to meet Northampton’s needs will be supported only if it meets the vision, objectives, and the policies of this plan.” Clearly, therefore, the WNJCS envisaged bringing forward additional land to meet Northampton’s needs outside of the SUEs and Northampton’s urban boundaries and by definition outside of the NRDA itself. Policy S3 of the WNJCS 2014 (Scale and Distribution of Growth) also provides flexibility and cites the distribution of housing numbers between the settlements articulated therein as approximate figures.

3.7 It is acknowledged that the WNJCS’s broad intention focus development around Northampton, but Policy S4 allows a certain degree of flexibility in how Northampton’s needs are met. This is recognised by the Part 2 Local Plan the supporting text to which states, though without introducing a corresponding policy, that it will entertain the principle of development adjoining the built-edge of Northampton under Policy S4 of the WNJCS 2014. However, there is no basis for confining the operation of Policy S4 solely to those sites which directly adjoin the built-edge of Northampton.

3.8 Even if there was, however, neither the plan nor its supporting documents demonstrate a deliverable supply of additional Northampton fringe sites in South Northamptonshire. It similarly does not automatically follow that just because a site physically abuts Northampton’s built-edge that it will be sustainably located or supported by appropriate infrastructure provision or be quick to deliver. While previous versions of the Part 2 Local Plan contained a sweeping draft policy which would have supported the principle of housing development provided it adjoined the built-edge of Northampton, this has been deleted from the Regulation 19 version. That decision is supported given that such a policy would
undermine a plan-led approach, but it has also left a significant gap in the Part 2 Local Plan as to how stalled delivery in the NRDA is to be addressed.

3.9 The most recent appraisal of five year housing land supply is the NRDA is dated April 2017 and puts five year housing land supply in this area at 2.64 years, a significant shortfall by any estimation and further evidence that interventions are needed in the short-term to boost the supply and to stimulate delivery. The Part 2 LP clearly presents an opportunity to do just that and one that has regrettably not been taken up.

3.10 The Part 2 LP is unsound as it does not address the issue of under-delivery in the NRDA. It is not justified because it does not present or even seek to present the most appropriate strategy for dealing with this issue, which the supporting text to the plan acknowledges is a significant one. The plan is not effective because it has not been based on joint working to address the critical cross-boundary issue of stalled delivery in the NRDA. It should be stressed that the Part 2 Local Plan sits under the WNJCS 2014 and a key part of the WNJCS’s spatial strategy is to meet Northampton Borough Council’s need for new homes. Given that both delivery and supply in Northampton and the NRDA continues to fall significantly short of requirements, there is need for further joint working through the Part 2 local plans to address the NRDA’s shortfall. Deferring this issue to a later plan is not appropriate given that the purpose of the Part 2 local plan is to deliver the strategy identified in the WNJCS 2014.

3.11 In order to make the plan sound, we would expect the Council to consider a full range of options to stimulate short-term housing delivery, including the allocation of additional sites in Northampton’s satellite villages which have good connections to Northampton, in order to ease the shortfall in the NRDA. Nether Heyford and Harpole are two such villages where Persimmon has land interests both suitable and deliverable for residential development. In addition to having a full range of services and facilities to support day-to-date living within their confines, these settlements have regular bus services to Northampton. Because of their self-contained nature and their existing facilities, these two villages offer a sustainable location for new residential development in a manner which would serve Northampton’s immediate needs and would be supported by existing services and facilities.

3.0 POLICY LH1: DEVELOPMENT WITHIN TOWN AND VILLAGE CONFINES

Summary: Draft Policy LH1 is not sound in the absence of rural housing allocations as it is not positively prepared, justified, or consistent with national policy. The Part 2 LP will not deliver the affordable housing target identified in the WNJCS 2014 for South Northamptonshire (excluding the NRDA) and this will clearly not be delivered through existing commitments. In order for the plan to be sound the Council should allocate suitable and sustainably-located housing sites in the rural area which are capable of rapid delivery and can bring forward an affordable housing component.
4.1 Draft Policy LH1 restricts development outside of village confines unless it falls within a certain list of exceptions. Along with the approach of not allocating any additional housing sites beyond those already committed, this inflexible and restrictive policy will not facilitate the delivery of sustainable development.

4.2 The Council claims that it has met its rural housing target set out in the WNJCS 2014 and so no additional allocations need to be made. Setting aside the fact that this does not address under-delivery in the NRDA nor does it take into account that the fact the numbers in the WNJCS 2014 are not a ceiling, this decision will not contribute to the sustainability or growth of rural settlements most notably in the area of affordable housing.

4.3 The West Northamptonshire Joint Authorities Monitoring Report 2016/17 states that in all of South Northamptonshire excluding the NRDA there were only 68 affordable housing completions. This equates to 13.4% of the targets in Policy H2 of the WNJCS which stand at 40% for the market towns and 50% elsewhere. The monitoring report 2015/16 reported 15% affordable housing completions or 112 units overall. In 2013/14 only 66 affordable units were completed in South Northamptonshire compared to 33 units in 2012/2013. What this portrays is a long-standing trend of affordable housing under-delivery since the base year of the WNJCS 2014 and one which has not improved over time. This has no doubt contributed to South Northamptonshire being the least affordable authority in Northamptonshire with an affordability ratio according to ONS data of 10.30.

4.4 The figures above are all the more concerning when Table 4 (Housing Requirement by Area 2011-2029) of the WNJCS sets out that in South Northamptonshire (excluding the NRDA) is required to deliver 3,300 affordable homes over the WNJCS plan period equating to 183 units per year. Delivery against this target is illustrated in the table below:

<table>
<thead>
<tr>
<th>Monitoring Year</th>
<th>Annual Affordable Housing Need</th>
<th>Affordable Completions</th>
<th>Deficit</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011/12</td>
<td>183</td>
<td>115</td>
<td>-68</td>
</tr>
<tr>
<td>2012/13</td>
<td>183</td>
<td>33</td>
<td>-150</td>
</tr>
<tr>
<td>2013/14</td>
<td>183</td>
<td>66</td>
<td>-117</td>
</tr>
<tr>
<td>2014/15</td>
<td>183</td>
<td>36</td>
<td>-147</td>
</tr>
<tr>
<td>2015/16</td>
<td>183</td>
<td>112</td>
<td>-71</td>
</tr>
<tr>
<td>2016/17</td>
<td>183</td>
<td>68</td>
<td>-115</td>
</tr>
<tr>
<td><strong>Total Affordable Housing Deficit</strong></td>
<td></td>
<td></td>
<td><strong>-668</strong></td>
</tr>
</tbody>
</table>

4.5 These figures that mean over the remainder of the WNJCS plan period South Northamptonshire would need to deliver 2,013 affordable homes to keep up with its annual requirement and a further 668 dwellings to recover past shortfall equating to 2,681 affordable homes to 2029 or 249 homes per year. According to the latest housing land supply data (South Northamptonshire Five Year Housing Land Supply April 2018), there are approximately 525 dwellings arising from committed sites in the South Northamptonshire rural area (excluding Towcester, Brackley, and the Northampton fringe). While there is no
breakdown between affordable and market housing, assuming policy-compliant affordable housing provision across all sites this figure should equate to a forward supply of approximately 262 additional affordable homes in the rural area over the remainder of the WNJCS plan period.

4.6 Even though committed sites and allocations at Towcester and Brackley will provide future affordable housing supply towards the residual WNJCS affordable housing requirement of 2,681, commitments here will only account for 10% of the overall need figure at most. Even in the most optimistic scenario of the total amount of strategic development brought forward in Towcester and Brackley delivered 40% affordable housing that would still only equate to 1,924 dwellings leaving a deficit of 757 affordable homes across the rest of the district’s rural area.

4.7 In reality large SUEs need to deliver significant infrastructure and so sometimes cannot viably accommodate the full policy compliant amount of affordable housing. In one such instance policy requirements as well as significant infrastructure meant that the Towcester South SUE could viably sustain 10% affordable housing. This alone leaves the balance of some 825 affordable homes to be found on other sites meaning that there are at least 1,582 affordable homes which are not planned for and which will not be delivered through existing commitments in the WNJCS plan period.

4.8 Whilst it is accepted that Policy LH1 allows for homes to be bought forward on affordable housing exception sites and in accordance with made neighbourhood plans, there is no evidence to suggest that this will lead to more affordable housing delivery than has historically been the case given that both rural exception sites and neighbourhood development plans have already been options to stimulate rural affordable housing delivery for some time. The WNJCS 2014 already makes provision for rural exception sites. It cannot be assumed that rural exception sites or neighbourhood plan development will come forward any quicker or in greater quantities than has historically been the case.

4.9 Even though the draft policy introduces a criteria-based policy for “starter” and “entry level” homes in line with the National Planning Policy Framework 2018, there is no evidence to suggest that there is a suitable, developable, and deliverable supply of such sites to meet future affordable housing need and make-up the substantial shortfall incurred since the start of the WNJCS plan period. The WNJCS in Table 4 is also very clear about the parameters of its affordable housing targets. It splits this target between intermediate affordable housing and affordable housing for social rent. It is therefore questionable whether starter and entry level homes are capable of counting towards the affordable housing targets set out in the WNJCS which refers to intermediate and socially rented tenures only. The Part 2 LP is subservient to the WNJCS and the WNJCS simply did not envisage bringing forward starter and entry level homes as affordable tenures.

4.10 The limb of Policy LH1 which provides support the principle of residential development within the town and village confines is unlikely to be sufficient to stimulate sufficient affordable housing delivery bearing in mind the national affordable housing threshold which precludes...
affordable housing being delivered through small schemes and the fact that the village and
town confines are tightly drawn around the exiting built-up area.

4.11 The Sustainability Appraisal (SA) accompanying the Part 2 plan sets out the alternative
options considered in relation to rural housing. The Council’s preferred strategy in this regard
(the adoption of narrowly-framed, criteria-based policies) is justified by the assertion that
South Northamptonshire Council has already met its rural housing requirement. However,
the discussion of alternatives in relation to rural housing within the SA does not acknowledge
the fact that there is a significant affordable housing shortfall in the rural area against the
target identified in the WNJCS 2014, a shortfall that is significant and thereby extremely
unlikely to be recovered without positive action. The decision not to allocate any additional
sites in the rural area will have an extremely negative sustainability impact in this regard,
namely against Sustainability Objective SO11b, and one which has not been properly
acknowledged in the SA.

4.12 Neither Draft Policy LH1 nor the plan as a whole will ease the significant affordable housing
shortfall the scale of which clearly requires a policy intervention to address. The Council
should be using the opportunity provided by the Part 2 LP to boost affordable housing
delivery in the rural area in line with the requirement expressed in the WNJCS 2014. Without
doing so, the Part 2 LP *does not plan positively to meet the identified affordable
housing requirement set out in the WNJCS 2014 and is therefore unsound on
these grounds.*

4.13 The failure to bring forward any additional sites in the rural area will lead to a large
deficiency of affordable housing in the majority of the authority area which is not consistent
with the aims and objectives of sustainable development. The strategy the plan is based
on is therefore *not justified* in relation to an alternative strategy, which would be bringing
forward additional sites in the rural area to ease the affordable housing shortfall and
facilitate delivery. Given that the plan is not consistent with the aims of sustainable
development, it follows that it is *not consistent with national policy*, namely the NPPF
2012, nor is it compliant with paragraph 47 of that document which among other things
requires local planning authorities to use their evidence base to ensure that their Local Plan
meets the full, objectively assessed needs for market and affordable housing.

4.14 *Persimmon considers that the most effective way to overcome this significant
deficiency in the plan is to allocate suitable and sustainably-located housing sites
in the rural area which are capable of rapid delivery and can bring forward an
affordable housing component. Persimmon’s interests in Harpole, Nether
Heyford, and Paulerspury (the merits of which are detailed in the accompanying
delivery statements) are such sites.*

5.0 POLICY LH10: HOUSING MIX AND TYPE

5.1 Draft Policy LH10 (Housing Mix and Type) seeks to require the provision of at least 5%
bungalows in all developments of 10 or more dwellings (Section 1, point b). Section 2, point
a of the policy requires that 50% of all new dwellings be constructed to the enhanced accessibility standards as follows:

- 45% of market housing to be built to Category M4(2) and a further 5% to M4(3)
- 40% of affordable dwellings built to M4(2) and a further 5% to M4(3).

5.2 In relation to market housing, the proposed percentages have been reached through a crude extrapolation from the demographic projections over the remainder of the of the plan period. Paragraph 5.32 of the Housing Market Evidence Report of Findings 2017 acknowledges that “Most of these older people will already live in the area and many will not move from their current homes; but those that do move home are likely to need accessible housing.” There is clearly a need to carry out an analysis of the accessibility and adaptability of existing housing stock in South Northamptonshire, which is referenced in government guidance (Paragraph: 007 Reference ID: 56-007-20150327) as an example of information which the local planning authority could take into account in demonstrating need. It is noted that the Council has referenced the Study of Housing and Support Needs of Older People Across Northamptonshire (March 2017), but this does not deal in any detail with justifying the need for enhanced accessibility standards generally. Rather, it relates to the recommended provision of specific housing types and tenure (care homes etc.) and the remit of Draft Policy LH10 is clearly much broader than that.

5.3 The only evidence adduced in support of the proposed Category M4(2) standard across market and affordable tenures is that West Northamptonshire has an aging population which is not in and of itself sufficient justification without a more nuanced consideration of existing stock, planned provision for specialist retirement accommodation and care homes over the remainder of the plan period, and consideration of how this need is distributed across different housing types and tenures. All these factors are referenced in government guidance but none appear to have been rigorously considered in arriving at Draft Policy LH10. It is clear that an aging population alone cannot be sufficient justification for introducing optional accessibility standards given that this is a national trend and had the Government had intended the optional technical standards to apply nationally, it would have been introduced as a mandatory requirement.

5.4 The Planning Practice Guidance (PPG) also states that the overall impact on viability should be considered in arriving at the decision as to whether to incorporate enhanced accessibility standards. The South Northamptonshire Viability Review (October 2018) does not properly consider the implications of introducing enhanced accessibility standards, nothing that the introduction of this requirement, including the requirement for 5% bungalows, will lead to “no additional costs.” However, the DCLG’s Housing Standards Review Cost Impacts (September 2014) identifies the average cost just for upgrading a home at £521 per Category 2 house, £924 per Category 2 flat, £22,694 per Category 3 House, and £7,906 per Category 3 flat. These figures do not take account of the extra build costs incurred from the additional floor space so cumulatively these additional costs cannot be described as “very minimal” particularly in the context of a local planning authority which has particular difficulty in delivering affordable homes at least in part due to viability concerns.
5.5 As for proposed requirement for 5% bungalows on sites above a certain threshold there appears to be no evidence whatsoever justifying this proposed policy requirement. There is even less justification for such a requirement when the Council is already seeking a significant proportion of market and affordable housing to be constructed to the enhanced accessibility standards. The Housing Market Evidence: Report of Findings (2017) does not allude to any qualitative or quantitative need for bungalows in South Northamptonshire nor is there any such justification in the Part 2 Local Plan’s evidence base. As a result this element of the plan is clearly not justified by sufficient evidence.

5.6 The draft policy also requires that 5% of market dwellings comply with M4(3). M4(3) relates to “wheelchair user dwellings.” The Planning Practice Guidance clearly states that “Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.” (Paragraph: 009 Reference ID: 56-009-2015032). Requiring 5% of market homes to be built to Category M4(3) is therefore clearly not compliant with national policy.

5.7 It appears that while considering the need for a certain proportion of M4(3) dwellings the Council has relied in part on the Study of Housing and Support Needs of Older People Across Northamptonshire (March 2017). As referred to above, however, this report does not appear to systematically consider the evidence for or against the introduction of the optional accessibility standard in line with Government guidance apart from identifying the housing needs of older persons. Policy LH6 (Specialist Housing and Accommodation Needs) is a positively-worded and flexible policy to encourage the delivery of specialist accommodation. There appears to be no consideration of how this will diminish the quantitative need to secure Category M4(3) dwellings through typical housing developments.

5.8 Overall, it is considered that need for the introduction of optional accessibility standards has not been evidenced or justified rendering the policy unsound. Furthermore, the drafting of the policy in this respect is not compliant with national policy because it requires Category M4(3) dwellings in market housing. Given the above, Persimmon objects to 1. b. and 2. Of Policy LH10. These parts of the policy should be deleted in order for the plan to be sound.

6.0 OTHER POLICIES

POLICY SS2: GENERAL DEVELOPMENT PRINCIPLES

6.1 Policy SS2 seeks to introduce an 18 point, criteria-based policy in relation to all development. The policy confirms that contravention of any of these points will result in a refusal of planning permission unless over-ridden by other material considerations. It is considered that this policy is excessively onerous and inflexible as well as vague giving insufficient certainty to both decision-takers and future applicants.

6.2 Point a. refers to the need to avoid any “significant” reduction of open countryside between settlements or their distinct parts with their being no further elaboration on which parts of
the open countryside are particularly important in this respect or what the “distinct parts” of
different settlements might constitute.

6.3 Point h. resists any loss of the best and most versatile agricultural land which is plainly
inconsistent with Paragraph 112 of the NPPF 2012 which simply requires that local planning
authorities take into account the economic and other benefits of the best and most versatile
agricultural land.

6.4 Point i. states that where relevant, development proposals should be accompanied by a
Health Impact Assessment (HIA) but does not set out the circumstances where the Council
will seek such a document.

6.5 Point p. requires development not to be located on or in proximity to land known to contain
mineral resources without first considering the need to safeguard these resources. This is
unduly vague and there needs to be cross reference to the information the Council will rely
on to make this judgement.

POLICY SDP 1: DESIGN PRINCIPLES

6.6 Much of Policy SDP1 repeats the content of Policy SS2. Consideration should be given to
whether unnecessary duplications exist and how these can be addressed through
appropriate redrafting. The points set out in Policy SDP1 need to be reframed to make clear
that they are to be read as only applying where necessarily and appropriate. Point e. should
be deleted entirely as the Council has carried out no assessment that would justify the
introduction of the Nationally Described Space Standards since there is no other objective
measure by which to assess whether development “ensures an appropriate degree of
functionality in terms of internal space.”

6.7 Policy SDP1 also seeks to ensure compliance with South Northamptonshire’s design guide as
well as any successor document. Using a policy to require strict compliance with a
Supplementary Planning Document is unsound as SPDs do not receive the same level of
scrutiny as development plan policies. The latter should not be used as a way to elevate
SPDs to that status.

POLICY INF4: ELECTRIC VEHICLE CHARGING POINTS

6.8 Policy INF4 seeks to require provision of electric vehicle charging points on all sites where an
additional dwelling is created with a garage or a driveway and, in developments of 10 or
more units with communal parking areas, two electric vehicle parking pays per 10 dwellings.

6.9 There is no evidence that such a requirement has been the subject of engagement with the
main energy suppliers to ensure the appropriate level of network capacity is achievable and
whether there are any constraints posed by the significant extra electric loading that such a
policy requirement will create. In addition, there is no adequate evidence to indicate that the
Council has costed the impact of such a policy requirement or considered the viability
impacts. As a result, Policy INF4 is not supported by appropriately robust or proportionate evidence and should be deleted in order for the plan to be sound.

POLICY NE2: SPECIAL LANDSCAPE AREAS

6.10 Policy NE2 seeks to introduce a number of criteria in respect of development located within Special Landscape Areas (SLAs). SLAs were originally provided for in South Northamptonshire by a very dated saved policy of the adopted local plan. The Council has commissioned a review of the SLAs which forms part of the evidence base for the Part 2 LP. Policy NE2 is unsound by extension of the fact that the Part 2 LP has not been informed by an appropriate consideration of development needs reflected in the absence of housing allocations despite stalled delivery in the NRDA and significant shortfalls against the affordable housing target set out in the WNJCS. Without bringing forward land for new development in order to meet these needs the Part 2 LP should not seek to designate areas of restraint because this will not have been informed by a full and proper consideration housing need.

6.11 The evidence underpinning the proposed SLA designations is extremely vague and appears to have used the existing SLA designations as a starting point rather than considering the merits of designation afresh. The methodology outlined in Section 2 of the South Northamptonshire: A Review of Special Landscape Areas (June 2017) sets out that the study has been shaped in no small part by existing studies and baseline information which could be inappropriately dated.

6.12 The use of the existing SLAs as a starting point is explicitly acknowledged in Section 2.2 of the 2017 report which states that the review is based on “the existing Special Landscape Areas of South Northamptonshire” and that “The written review will define the special qualities and values of the [sic] South Northamptonshire’s locally designated landscape.” This approach cannot be described as an objective review of SLAs but one which simply carries forward the existing SLAs from the 1997 local plan to the Part 2 Local Plan.

6.13 For the reasons set out above Policy NE2 is unsound and should be removed from the plan.