Dear Andy,

Representation to South Northamptonshire Part 2 Local Plan
(Draft Submission – Regulation 19 Consultation)
Representation on Behalf of Davidsons Developments Ltd

I write on behalf of Bidwells’ client Davidsons Developments Ltd in response to the above consultation.

I enclose with this response 2 no. Site Location Plans of my client’s land interest at Land East of Mill Lane, Greens Norton. The first Site Location Plan (Ref: A4644) shows the extent of the whole site, with a gross site area of some 3.86ha. The second Site Location Plan (Ref: A4644a) shows part of the site, with a gross site area of some 1.25ha. For clarity, we have made separate submissions in respect of both the whole and part of the site.

I also enclose with this response 1 no. Site Location Plan (Ref: A47662) of my client’s land interest at Land West of Rothersthorpe Road, Kislingbury. The site is allocated for development of approximately 40 new homes in the Kislingbury Parish Neighbourhood Development Plan 2014-2029 (KPNDP), which was ‘made’ on 18th May 2017 and forms part of the Development Plan for South Northamptonshire.

We note from the South Northants Developer & Agent Briefing on the Part 2 Local Plan held on 9th October 2018 that the Council anticipate that the Part 2 Local Plan will be submitted to the Secretary of State on or before 24th January 2019. Paragraph 214 of the revised National Planning Policy Framework (rNPPF) dated July 2018 states that “the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24th January 2019.” It is likely that the Part 2 Local Plan will be submitted before 24th January 2019 and so the policies in the National Planning Policy Framework (NPPF) dated March 2012 (i.e. “the previous Framework”) will apply to the LPP2.

We consider that the Proposed Submission version of the Part 2 Local Plan is not sound under the ‘test of soundness’ in paragraph 182 of the NPPF. The plan has not been positively prepared, it is not justified or effective and it is not consistent with the NPPF.

Email: localplanconsultation@southnorthants.gov.uk
We consider that the Council should take a more proactive approach to identifying additional housing in the Part 2 Local Plan based on potential additional housing need from more up-to-date evidence base that will underpin the preparation of the West Northamptonshire Strategic Plan. The Council should seek to identify additional housing allocation in the Part 2 Local Plan in the District’s rural area. A more positive approach will help to ensure continued housing delivery and a five-year housing land supply position is maintained as the Council progress towards the preparation of the West Northamptonshire Strategic Plan. Adoption of the West Northamptonshire Strategic Plan is not likely to take place until January 2022. The strategic policies within the WNJCS will be out of date by December 2019. Smaller, more deliverable sites in the District’s rural area should be allocated for housing as they can meet housing need and delivery in the short term. Housing allocations in the rural area assist with sustaining rural amenities and services, which is increasingly important for settlements that have an ageing and/or declining population.

Where relevant, suggestions for changes to the Proposed Submission version of the Part 2 Local Plan to address the concerns in respect of soundness are identified in these representations. It is requested that the Council considers these representations, makes appropriate changes as identified in these representations and undertake a further consultation under Regulation 19.

Vision and Objectives

It is important to recognise the housing requirements in the vision and in the objectives. We have concerns that the vision does not sufficiently consider the necessary growth implications for the District’s rural area and does not sufficiently identify the settlements in the rural area to which the amount of growth will be directed.

Objective 4 of the Part 2 Local Plan seeks “to provide a range of new housing, of high quality environmental and design standards, including those relating to designing out crime, to meet the needs of all sections of our proposed and existing population, including affordable, housing for the younger generation and housing for older persons, vulnerable people and those with specialist housing needs.” As currently drafted, the vision and objectives do not include the rural area’s growth requirements. No additional residential land has been identified for the rural area of the District.

Object to Vision and Objectives: The vision and objectives should be amended to consider the necessary growth implications for South Northamptonshire’s rural area and the sufficient amount of growth for settlements in the rural area.

The Spatial Strategy for South Northamptonshire District

Paragraph 3.1.5 of the Part 2 Local Plan states that the “Part 2 Plan does not make allocations for additional housing within South Northamptonshire. This is because the overall strategic housing needs set-out within the WNJCS for the towns of Towcester and Brackley and the rural areas will be met, and in the case of the rural areas exceeded. However, it is acknowledged that there will continue to be a need for new affordable and market homes both to meet current government policy and, in addition, to ensure the sustainability of the rural areas. The approach to providing new homes is set out within the following policies that include:

- Revisions to the Settlement Hierarchy, to reflect the current levels of services and facilities in addition to accessibility to surrounding settlements;
- A review of settlement confines;
- Clarity on how development proposals within development confines will be managed;
- Exceptions to the above policy approaches including self-build, starter homes and other routes to low cost, affordable and entry level housing.”
The housing requirements and the Objectively Assessed Need (OAN) set out in the WNJCS are underpinned by the West Northamptonshire Strategic Housing Market Assessment (SHMA) 2009 (Report of Study Findings, May 2010) prepared by Opinion Research Services. The housing requirements and OAN in the SHMA are based on the East Midlands Regional Plan (RSS) published March 2009. The RSS was revoked by the Secretary of State on 20th March 2013.

The WNJCS was adopted in December 2014. The OAN identified in the WNJCS is not a maximum figure. Furthermore, a condition of the WNJCS being found sound by the Examination Inspector was that a review should be undertaken and the plan be adopted by 2020. This will need to be underpinned by a review of the technical evidence including a review of the OAN for West Northamptonshire. At the time of writing, proposals have been set out for preparation of the West Northamptonshire Strategic Plan which will replace the adopted WNJCS and the timescales have been identified as follows: Reg 18 consultation due April 2019 and September 2019, Reg 19 due December 2020, submission to SoS in April 2021, Examination in Public from September 2021 and adoption of the plan in January 2022.

The Housing White Paper (published 7th February 2017) set out how the Government will deliver their 2015 commitment of a million new homes by 2020, and want to supply a further half a million by 2022. It is also relevant to note that the Government’s ‘Planning for the right homes in the right place’ consultation (published 14th September 2017) identified indicative assessment of housing need based on the proposed standard methodology from the current local assessment of housing need. The measures in this consultation will help ensure that local authorities plan for the right homes in the right places through up-to-date Local Plans. The Government’s consultation sets out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth. The housing need for West Northamptonshire authorities based on the standard methodology would need to be considered as part of the preparation of the West Northamptonshire Strategic Plan. The Government’s consultation sets out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth.

Paragraph 156 of the NPPF requires local planning authorities to set out the strategic policies for the area in the Local Plan, including strategic policies to deliver the homes and jobs needed in the area. Furthermore, paragraph 157 of the NPPF requires, crucially, Local Plan to plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework. In addition, paragraph 158 requires Local Plan’s to be based on adequate, up-to-date and relevant evidence and paragraph 159 requires local planning authorities to have a clear understanding of housing needs in their area and should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs.

The housing provision in the WNJCS is based on an evidence base that has been revoked under the RSS and the OAN is fast approaching its “sell-by date”. One can deduce that the OAN contained within the WNJCS should be considered out-of-date by December 2019, which is five-years from adoption of the plan (less than two years from now). Whilst the Council consider that they have exceeded the WNJCS housing requirements for the rural area with 11 years of the plan period remaining, the reality is such that the Council should, jointly with the other West Northamptonshire authorities, begin a review of the strategic policies for West Northamptonshire now to allow sufficient time for the review, preparation of a new plan and then adoption by 2020. It is clear however that adoption of the West Northamptonshire Strategic Plan is not likely to be until January 2022. This could mean a gap of approximately two years whereby the strategic policies in the WNJCS are out-of-date until the West Northamptonshire Strategic Plan is adopted.

We consider that the approach taken by the Council to only identify no housing at the District’s rural area is not a positive approach to plan-making based on a strategy which seeks to meet the objectively
assessed need of the WNJCS, is not justified by a robust evidence base and is inconsistent with the requirements of the NPPF.

We consider that the Council should take a more proactive approach to identifying additional housing in the Local Plan Part 2 based on potential additional housing need from more up-to-date evidence base that will underpin the preparation of the West Northamptonshire Strategic Plan. The Council should seek to identify additional housing allocation in the Part 2 Local Plan in the District's rural area. This includes identifying the amount of growth specific to individual settlements within the rural area. A more positive approach will help to ensure continued housing delivery and a five-year housing land supply position is maintained as the Council progress towards the preparation of the West Northamptonshire Strategic Plan. Smaller, more deliverable sites in the District's rural area should be allocated for housing as they can meet housing need and delivery in the short term. These smaller sites are much less reliant (than larger sites) on significant infrastructure in order for them to come forward. The Part 2 Local Plan as drafted does not provide flexibility in the development strategy and we consider that the approach to identifying growth in the rural area (e.g. no growth) should be adjusted accordingly. Smaller allocations would not undermine the existing strategic housing policies and would assist in maintaining housing delivery in the circumstance of under delivery from larger strategic sites.

**Object to approach ‘The Spatial Strategy for South Northamptonshire District’: The Council should consider the necessary growth implications and the sufficient amount of growth for settlements in the District’s rural area. Allocate additional housing in the District's rural area in the Part 2 Local Plan. Smaller sites should be allocated for housing as they are more deliverable, can meet housing need in the short term and are not reliant on significant infrastructure in order for them to come forward.**

**Policy SS1: The Settlement Hierarchy**

It is noted that Policy SS1: The Settlement Hierarchy identifies a settlement hierarchy for the District and requires proposals for new development to be directed towards the most sustainable locations in accordance with the hierarchy. The two Rural Service Centres of Brackley and Towcester form the first tier, followed by five Primary Service Villages under the second tier. Greens Norton and Kislingbury are identified as two of 13 no. Secondary Service Villages (A) under the third tier. A further 16 no. settlements are identified as Secondary Service Villages (B) under the third tier.

We are supportive of the identification of Greens Norton and Kislingbury as Secondary Service Villages (A) as this reflects the character, services and facilities in terms of sustainability for the settlement and access to local amenities. We note that in the evidence base, the sustainability matrix (Appendix 3 of the Local Plan Options Consultation Document, April 2016) concludes that Greens Norton scores highly in terms of access to services and facilities with a total of 105 points (ranked 8th out of 94 villages). Kislingbury also scores highly with a total of 92 points (ranked 11th out of 94 villages).

Whilst it is useful to understand a settlement hierarchy that ranks settlements according to their size and their range of services and facilities, it is unclear of the purpose of Policy SS1 given that there are no residential allocations to the rural area of the District.

This policy has limited effect in terms of growth for Greens Norton and Kislingbury as there is little opportunity for further housing development within the village confines of Greens Norton and Kislingbury as shown at Appendix 1: Proposals Maps of the Part 2 Local Plan and the only opportunity for major residential development would be on greenfield sites adjoining the village confines.
The policy does not have the necessary clarity to provide either applicants or decision-makers, as required by paragraph 17 of the NPPF, to make predictable and efficient decisions. It is not consistent with national policy.

**Object to Policy SS1:** It is unclear of the purpose of Policy SS1 given that there are no residential allocations to the rural area of the District.

**Policy SS2: General Development Principles**

Policy SS2: General Development Principles states that planning permission will be granted for developments which comply with the following criteria where relevant.

This policy does not define circumstances where criteria might be considered relevant and hence this would be left to the development management function. This is relevant as the criteria are all linked with ‘and’ and hence an interpretation in the absence of a steer on relevance of criteria is that all criteria apply.

Limb ‘b’ of the policy requires proposals to not result in the unacceptable loss of undeveloped land, open spaces and locally important view of particular significance to the form and character of a settlement.

We consider that there is no clarity or justification of evidence as to what is defined as an area of undeveloped land, open space or locally important view of particular significance. Such matters should be defined in Neighbourhood Plans.

Limb ‘i’ of the policy requires development to contribute towards the creation of a healthy community and, where relevant, assessed potential impacts through a health impact assessment (HIA).

There is no national requirement for a health impact assessment to be undertaken for all development proposals and there is no justification for this under this policy. The reference to health impact assessment should be omitted from this policy.

Limb ‘n’ of the policy requires development to meet the optional higher water efficiency standard of 110 litres per person per day.

We note that paragraph 3.3.11 refers to the Environment Agency report ‘Water Stressed Areas Final Classification (2013)’ regarding areas classified as ‘Areas of serious water stress’ and the Anglian Water company area is considered to be such an area and includes South Northamptonshire District.

Figure 2 of the report shows the water bodies at risk of stress within individual water company areas. It is clear from Figure 2 on the report that the vast majority of South Northamptonshire District would fall within ‘Low’ water stress classification. Limb ‘n’ as drafted is therefore not justified by the evidence.

**Object to Policy SS2: Change Required:** Amendment to limb ‘b’ to understand what is defined as an area of undeveloped land, open space or locally important view and whether such matters would be address through Neighbourhood Plans. Omission of reference to health impact assessment as it is not justified under national requirements. Omission of requirement for optional higher water efficiency standard of 110 litres per person per day as it is not justified from the evidence.

**Policy LH1: Development within Town and Villages Confines**

We note the specifications for residential development within town and village confines under limb 1 of Policy LH1.
Limb 2 of Policy LH1 states that sites of 10 or more dwellings will be expected to provide affordable housing in accordance with Policy LH8. We have objected to Policy LH8 below in this representation. As individual requirements are set out under Policy LH8, there is no need to duplicate reference to Policy LH8 under limb 2 of Policy LH1. We suggest that limb 2 of Policy LH1 is deleted.

Limb 3 of Policy LH1 sets out specifications for where development outside of the village confines is considered acceptable including the need for the site to be allocated within a made neighbourhood plan and reference to Policies LH2, LH3, LH4, LH5, LH6 and LH9. Again, requirements have been set under these individual policies and there is no need to duplicate reference to these under Policy LH1.

Furthermore, paragraph 73 of the rNPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites against their housing requirement set out in adopted strategic policies. Paragraph 11d of the rNPPF sets out the presumption in favour of sustainable development and applications for housing where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites under footnote 7.

We consider that Policy LH1 as drafted would not allow for sufficient flexibility should the presumption in favour of sustainable development be triggered under the rNPPF.

It is considered that Part 3 of Policy LH1 should be omitted in its entirety.

**Object to Policy LH1**: The policy duplicates reference to other policies and does not allow for sufficient flexibility should the presumption in favour of sustainable development be triggered under the rNPPF.

**Policy LH2: Starter Homes Outside of Settlement Confines**

We note the specifications as set out under Policy LH2 for the delivery of starter homes outside of settlement confines.

The Government published a Housing White Paper (HWP) ‘Fixing our broken housing market’ on 7th February 2017. Paragraph 4.17 of the HWP stated that the Government intent to amend the NPPF to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units; and it will be for local areas to work with developers to agree an appropriate level of delivery of starter homes, alongside other affordable home ownership and rented tenures.

Annex 2 of the rNPPF defines starter homes under affordable housing. We therefore consider that the Council should strongly consider incorporating reference to starter homes as part of the affordable housing requirement under Policy LH8. This would allow for a wider range of people to access affordable housing and be in accordance with national objectives under the HWP and the definition of affordable housing under Annex 2 of the NPPF.

**Object to Policy LH2**: Reference to starter homes should be incorporated as part of the affordable housing requirement under Policy LH8.

**Policy LH8: Affordable Housing**

It is noted that Policy LH8: Affordable Housing sets out the affordable housing requirement for the District, including provision of 50% affordable housing on sites with 10 or more dwellings in the Rural Areas.
My client strongly objects to Policy LH8 on the basis that the policy does not acknowledge the viability of development sites and so lower percentages of affordable housing can be provided.

Paragraph 173 of the NPPF requires careful attention to viability and costs in plan-making. Sites should not be constrained by policy burdens and to ensure viability, the costs of any requirements (e.g. affordable housing), when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

There is a clear need for affordable housing within the District; however, it is important that the affordable housing requirement does not restrict development within the District. In certain circumstances, we consider that this level of affordable housing provision may not be possible; in such instances, we consider that viability testing will need to be considered on a case by case basis. We acknowledge that the allowance of off-site affordable housing in exceptional circumstances may be supported in lieu of an on-site contribution; however, the lack of acknowledgement of the viability of development proposals is insufficient.

In certain circumstances, we consider that this level of affordable housing provision may not be possible; in such instances, viability testing will need to be considered on a case by case basis.

We consider that the Council should consider a lower affordable housing targets as this would be a suitable parameter based on viability and leaves the Council the opportunity to consider a wider scope in considering CIL and/or continued s106 contributions for wider planning obligations at meaningful levels.

As discussed above under Policy LH2, reference to starter homes should be incorporated as part of the affordable housing requirement under Policy LH8.

Based on the above, we consider that Policy LH8 is unsound as the policy is unjustified in terms of its evidence base and inconsistent with national policy.

Object to Policy LH8: The policy does not adequately consider the viability of development sites and the Council should consider a lower percentage of affordable housing requirement. The policy should consider incorporating starter homes as part of the affordable housing requirement.

Policy LH10: Housing Mix and Type

It is noted that Policy LH10: Housing Mix and Type requires new residential development to provide a mixture of types, tenure, size and costs of homes to meet the varied needs of existing and future residents to contribute to the creation of mixed, balanced and inclusive communities.

We consider that it is vital that a mix of housing is provided to ensure social diversity and mobility. Proposed residential development must meet the current requirements as well as ensuring the aspirations for the housing market area are met.

Paragraph 4.11.1 of the Part 2 Local Plan states that Policy LH10 reflects the 2017 Housing Market Evidence Study.

We note that Policy LH10 requires new residential development to provide a mixture of types, tenure, size and costs of homes. We consider that it is unreasonable for a local planning authority to define the cost of a home and this matter will be defined by the market. Reference to “costs” in the policy text should be omitted.
It is noted that Policy LH10 requires provision of at least 5% bungalows on all developments of 10 or more dwellings. We consider that there is no evidence within the 2017 Housing Market Evidence Study to apply an automatic assumption of 5% bungalows on sites. Therefore, we suggest reference to 5% bungalows provision is omitted from the policy.

It is noted that Policy LH10 requires developments of 10 or more dwelling to deliver 50% of new residential dwellings to accessibility standards higher than the minimum building regulation requirements as follows:

- Market Housing – 45% to M4(2) and a further 5% to M4(3); Affordable dwellings – 40% to M4(2) and a further 5% to M4(3).

The 2017 Housing Market Evidence Study considers that “the increase in people aged 65+ represents 57% of the household growth: 23,000 households out of the 40,500 total” (paragraph 3.7). However, the Study also states that “it is important to note that many of these older households will already be established and living in existing homes in West Northamptonshire; they will simply get older during the Plan period” (paragraph 3.8).

Policy LH10 is based on the assumption that the vast majority of people will automatically require a new home that is Category 2 or 3 requirements as soon as they reach the age of 65+ and the demand for this standard of housing is as such. In reality, this simply will not be the case and it will be likely that the demand for Category 2 or 3 requirement housing is well below a 50% requirement as set out in Policy LH10 despite a projected increase in population. As already identified in the 2017 Housing Market Evidence Study, many of the older households will already be established and living in existing homes and so the actual demand for Category 2 and 3 housing will be much lower than anticipated.

We consider that the detailed reference to the mix of housing types and sizes and the reference to Building Regulations and other housing standards identified under the policy is too prescriptive. The policy must be sufficiently flexible to adapt to changing circumstances as required by paragraph 14 and paragraph 50 of the NPPF. Regarding the specific levels proposed to Building Regulations within the policy, we consider that it is too rigid to specify percentages of dwellings to meet Building Regulations and we consider that this should relate to the identified need. Viability testing will be considered on a case by case basis here. In any event, we consider that it is not necessary to require adherence to Building Regulations within a development plan policy and therefore this reference should be omitted.

We consider that Policy LH10 is unsound as the policy is unjustified in terms of its evidence and inconsistent with national policy.

Object to Policy LH10: The reference to the detailed mix of housing types and sizes and the reference to Building Regulations and other housing standards identified should be omitted. The percentage requirements are not justified and should be targets, not a fixed requirement, linked to identified need. Reference to “costs” in the policy and 5% bungalows provision should be omitted.

Policy SDP1: Design Principles

Policy SDP1 requires new development to make a positive contribution to the built and natural environment.

The guidance under section 7 of the NPPF does not require a positive contribution to local spatial character.
Paragraph 57 of the NPPF states that it is important to plan positively for the achievement of high quality and inclusive design of development and paragraph 60 requires policies and decisions to promote or reinforce local distinctiveness which allows for a neutral effect as a result of new development.

Likewise, section 12 and design principles for planning policies and decisions set out under limbs ‘a’ to ‘f’ of paragraph 127 of the rNPPF does not require a positive contribution to local spatial character.

Seeking to impose this requirement in the Part 2 Local Plan will go beyond the national guidance which allows for local character and appearance to be retained or maintained but not necessarily to contribute positively which is a higher standard.

We would like to raise concern about the reference to “all development should be consistent with South Northamptonshire’s design guide (and any successor document)” as this is not justified and it is overly restrictive. The South Northamptonshire’s design guide (and any successor document) is supplementary guidance and hence was the subject of less consultation and examination in comparison to development plan policy. There were objections to the draft of the guide made by some sections of the development industry which were not addressed in the final version of the guide. The definition of SPD within Annex 2: Glossary of the NPPF states that such documents can add further detail to the policies in a Local Plan and are capable of being a material consideration in planning decisions but they are not part of the development plan.

By preparing a development plan policy such as this one which requires all development to be consistent with the design guide there is a status being assigned to the design guide without justification and contrary to the NPPF. In effect the design guide would become development plan policy where such policy requires development to be consistent with it.

Reference to the South Northamptonshire’s design guide (and any successor document) should be omitted from the policy.

Object to Policy SDP1: Changes Required: Omission of requirement for new development to make a positive contribution to the built and natural environment. Reference to the South Northamptonshire’s design guide (and any successor document) should be omitted from the policy as this is not justified and it is overly restrictive.

Policy INF4: Electric Vehicle Charging Points

Policy INF4: Electric Vehicle Charging Points sets out requirements for development in relation to the provision of electric vehicle charging points. This includes a requirement for all sites where an additional dwelling is created with a garage or driveway, AC Level 2 equipment or equivalent for charging electric vehicles will be required. Furthermore, for residential developments of 10 or more units with communal parking areas two parking bays marked out for use by electric vehicles only together with AC Level 2 equipment or equivalent per 10 dwellings will be required.

We consider that the reference to the requirements set out under the policy is far too prescriptive. There is no evidence base to suggest that this level of electric vehicle charging points is justified. Furthermore, reference to AC Level 2 equipment is a snapshot in time and the technology relating to electric vehicle charging points is likely to advance considerably beyond the specifications set out in the policy.

In view of the above, we consider that the policy is unsound as it is unjustified and ineffective and suggest that the policy is omitted.
Object to Policy INF4: The policy should be omitted as it is too prescriptive and is considered to be unjustified and ineffective.

Policy GS1: Open Space, Sport and Recreation

Policy GS1: Open Space, Sport and Recreation sets out requirements where open space, sport and recreation facilities should be provided.

We consider that open space, sport and recreation facilities should be provided in close proximity to those who will be using the facilities. Whilst it is useful for the Council to provide guidance on the amount of open space, sport and recreation facilities required, there will be circumstance whereby developments would not be of sufficient size to provide meaningful quantities of the required threshold set out under the policy. Furthermore, off-site provision for open space, sport and recreation facilities through financial contributions can be made where a site is constrained or there is an identified local need to support existing provision or facilities. Each site should be considered independently in terms of the level of meaningful contribution to can make to open space, sport and recreation facilities. The level of contribution should be based on a demonstrable need depending on the aspirations of the local community and the level of existing provision.

Based on the above, we consider that Policy GS1 is unsound as the evidence is unjustified and the policy is ineffective.

Object to Policy GS1. Change Required: Flexibility within the policy should allow for sites to be assessed on a case-by-case basis in terms of requiring on-site or off-site provision.

Appendix 1: Proposals Map

My client’s land interest at Greens Norton and Kislingbury represent achievable, suitable and deliverable sites.

The Part 2 Local Plan should be revised to allocate my client’s site at Green Norton within the village confines map for Greens Norton at Appendix 1: Proposals Maps and be identified as a residential allocation.

We are supportive of the inclusion of my client’s site at Kislingbury within the village confines map for Kislingbury at Appendix 1: Proposals Maps. As such, the site should be identified as a residential allocation.

The sites would be suitable for development and there are no known constraints to the proposed allocation of the sites for housing. Safe access to the sites can be achieved off Mill Lane and off Rothersthorpe Road with sufficient visibility and the surrounding junctions and road network within the villages have sufficient capacity to accommodate any additional traffic generated. The sites are located close to a range of amenities and services in Greens Norton and Kislingbury. The entire sites are located within Flood Zone 1 according to the Environment Agency Flood Maps online, therefore are the lowest risk of flooding (less than 1 in 1,000 probability of river flooding). Development of each of the sites would provide significant benefits including provision of market and affordable homes, publicly accessible open space on-site and contribute towards the local economy during the plan period. The site at Kislingbury is allocated for development in the ‘made’ KPNDP to 2029. The sites represent achievable, suitable and deliverable sites to boost the supply of housing and maintain a rolling 5-year supply of suitable housing sites throughout the lifetime of the plan.
Object to Appendix 1: Proposals Map – Greens Norton. The Part 2 Local Plan should be revised to allocate my client’s site at Green Norton within the village confines map for Greens Norton at Appendix 1: Proposals Maps and be identified as a residential allocation.

Support Appendix 1: Proposals Map – Kislingbury. We are supportive of the inclusion of my client’s site at Kislingbury within the village confines map for Kislingbury at Appendix 1: Proposals Maps. As such, the site should be identified as a residential allocation.

Conclusion

My client welcomes this opportunity to comment on the Proposed Submission version of the Part 2 Local Plan. As it stands, the plan is not sound and hence there are a number of changes required to the plan including the strategic approach to allocating additional housing growth in the Part 2 Local Plan and some of the development management policies as identified above.

We consider that the approach taken by the Council to identifying no housing at the District’s rural area is not a positive approach to plan-making based on a strategy which seeks to meet the objectively assessed need of the WNJCS, is not justified by a robust evidence base and is inconsistent with the requirements of the NPPF.

We consider that the following policies are unsound and for reasons stated above, do not meet the test of soundness: SS1, SS2, LH1, LH2, LH8, LH10, SDP, INF4 and GS1.

We consider that the Council should take a more proactive approach to identifying additional housing in the Part 2 Local Plan based on potential additional housing need from more up-to-date evidence base that will underpin the preparation of the West Northamptonshire Strategic Plan. The Council should seek to identify additional housing allocation in the Part 2 Local Plan in the District’s rural area. A more positive approach will help to ensure continued housing delivery and a five-year housing land supply position is maintained as the Council progress towards the preparation of the West Northamptonshire Strategic Plan. Smaller, more deliverable sites in the District’s rural area should be allocated for housing as they can meet housing need and delivery in the short term. Housing allocations in the rural area assist with sustaining rural amenities and services, which is increasingly important for settlements that have an ageing and/or declining population.

It is clear that adoption of the West Northamptonshire Strategic Plan is not likely to be until January 2022. This could mean a gap of approximately two years whereby the strategic policies in the WNJCS are out-of-date from January 2020 until the West Northamptonshire Strategic Plan is adopted in January 2022.

My client’s site at Greens Norton and Kislingbury represent achievable, suitable and deliverable sites for residential development to meet the District’s housing requirements, ensure continued housing delivery, a five-year housing land supply position for the District is maintained and will assist with sustaining the local amenities and services within the villages, especially where the population of villages is in decline.

The population decline supports the case for further residential development to support existing village amenities and services; otherwise, there is a risk that no further residential development will jeopardise the viability of existing amenities and services, which could result in less sustainable villages.

Smaller allocations would not undermine the existing strategic housing policies and would assist in maintaining housing delivery in the circumstance of under delivery from larger strategic sites.
The Part 2 Local Plan should be revised to allocate my client’s site at Green Norton within the village confines map for Greens Norton at Appendix 1: Proposals Maps and be identified as a residential allocation.

We are supportive of the inclusion of my client’s site at Kislingbury within the village confines map for Kislingbury at Appendix 1: Proposals Maps. As such, the site should be identified as a residential allocation.

Should you have any queries in respect of my client’s representation, please do not hesitate to contact me. My contact details are included in the letterhead. Alternatively, I look forward to receiving your written confirmation of my client’s representation to the South Northamptonshire Part 2 Local Plan (Draft Submission – Regulation 19 Consultation) and I look forward to receiving notification of all future stages of development of this plan and associated evidence base. It is requested that the Council considers these representations, makes appropriate changes as identified in these representations and undertake a further consultation under Regulation 19.

Yours sincerely,

Robert Love
Senior Planner, Planning

Encl. As Above
Cc. Client