Representation to South Northamptonshire Part 2 Local Plan
(Draft Submission – Regulation 19 Consultation)
Representation on Behalf of Catesby Estates

This statement is submitted on behalf of Catesby Estates in response to the above consultation for the Part 2 Local Plan (LPP2).

Catesby note from the Proposed Submission Draft that the Council anticipate that the LPP2 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 examination.

Catesby 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.

Vision and Objectives

It is important to fully 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 to help steer Neighbourhood Plans and planning applications made under the draft policies contained in Chapter 4. Whilst we welcome the acknowledgement of the need to sustain the villages, in many cases, including at Middleton Cheney, there is little opportunity to do this without an adjustment to the settlement confines to facilitate the acknowledged continuing need for new affordable and market homes during the plan period, as set out in paragraph 3.1.5 of the draft plan.

The Spatial Strategy for South Northamptonshire District

WNJCS Housing Requirements

The West Northamptonshire Joint Core Strategy (WNJCS) adopted December 2014 sets out the provision of 6,300 new homes across South Northamptonshire (excluding the Northampton-related Development Area) to 2029. WNJCS Policy 3 uplifts this to about 7,170 to reflect the interim 2011 projections at the time, equating to circa 400 dwellings per annum. This is broadly split between the two main towns of Towcester and Brackley (about 4,810) and the rural area (about 2,360). The Council states that the LPP2 will continue to plan for housing figures in the adopted WNJCS.

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 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” if not already obsolete. It is noteworthy that a condition of the WNJCS being found sound by the Examining Inspector was that a review should be undertaken promptly and the plan be adopted by 2020. This commitment is set out in paragraph 3.17 of the WNJCS.

The Joint Planning Unit has since dissolved in January 2018. The three joint councils (Northampton Borough, South Northants and Daventry District) have now confirmed their commitment to working together through a Joint Planning Board. 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. It is therefore clear that a replacement strategic plan based on an objective assessment of housing need will miss the 2020 requirement by two years. In addition, there is potential for further delays arising with the recently proposed Unitary Authority for West Northants which is awaiting a decision by Government. The future review to roll forward policy beyond 2029 has a degree of uncertainty surrounding it.

Adoption of the LPP2 by September 2019 would leave less than 10 years remaining of the plan period, and is based on an out-of-date housing requirement in the adopted WNJCS. This is contrary to the objectives of paragraph 157 of the NPPF (repeated in paragraph 22 of the rNPPF 2018). Given the fact that the WNJCS review is not being delivered at the committed pace, the LPP2 could rectify this shortcoming and take account of the most up-to-date household projections and be rebased accordingly to be found sound in terms of Paragraph 47 of the NPPF.

At the very least there should be a clear commitment to an early review of the development plan enshrined in policy within the LPP2, rather than as supporting text.

Proposed Change: Include an additional policy to specifically commit to an early review

SNC Housing requirement

It is acknowledged that the growth for the rural area (beyond the NRDA), as identified by Policy 3 of WNJCS has been met. This comprises current completions of 3,092 between April 2011 and March 2018, as set out in the latest Housing Land Supply Report (SNC, April 2018). This equates to an over delivery of 635 homes in that period. As a result, the Council has opted not to allocate further sites across the rural area beyond the two main towns in LPP2.

The consequence of this action is that any new allocations are deferred to the review of the WNJCS.

Housing Land Supply:

The Part 2 plan assumes that the entirety of the Towcester and Brackley allocations will be completed by 2029. Should there be any slippage in the delivery at the two towns, LPP2 does not contain a strategy for making up any shortfall in this circumstance.

WNJCS at paragraph 6.16 recognises that “whilst in general terms the rural housing needs will be set by the requirements set out in Policy S3, it is not the intention of the Plan to prevent additional appropriate
development in rural areas from coming forward*. Identifying additional allocations in the rural area within LPP2 would not conflict with the higher tier WNJCS.

Catesby consider that the WNJCS figures should be treated as ‘minimum’ levels to be accommodated, not a ceiling. Particularly considering the NPPF requirement to significantly boost the supply of housing and Central Government’s initial consultation on a formula for the standardised methodology of assessing housing need which highlighted a potential additional 91 dwellings per annum for SNC area to 2026. This would have the effect of adding another 728 homes to the current requirement (2018-2026) or potentially 1,001 if extrapolated to the end of the plan period to 2029. In this scenario, land for a further 350 homes would need to be found to 2029.

Following the September 2018 household projections, MHCLG is currently undertaking a technical consultation on updates to national planning policy and guidance (Oct 2018) to update its standard methodology set out in rNPPF 2018 to ensure that 300,000 homes are built annually by the mid 2020’s. This reaffirms the potential direction of travel for housing requirements to increase significantly during the plan period.

To be found sound, LPP2 must be positively prepared to meet the Objectively Assessed Housing Need across the Housing Market Area. Notwithstanding the housing land supply for the district beyond the Northampton related Development Area (NRDA), it is key to note that housing delivery has stalled in the NRDA. As at March 2017 housing delivery was at 4,707 completions (Source: NBC, NRDA 5YHLSA, April 2017) with a 1,280 shortfall in the delivery of the NRDA. This translates to a 21% shortfall. Going forward, the problem will be exacerbated as the projected 5-year supply for the NRDA is also predicted to fall short, estimated at 2.64 years in the latest NBC Assessment (April 2017).

A year on from the last published figures, we are aware of large schemes that have not yet started, despite being predicted to deliver a first phase during 2018/19 onwards (such as Northampton South SUE – WNJCS Policy N5 which falls within South Northants District – extract from pg 7 is shown at Table 1 below). When updated, we expect the NRDA position to have worsened.

### Table 1 Extract from The NRDA 5 Year Housing Land Supply Assessment, April 2017

| Address Location | Available site wider Construction? | Available site wider Housing allocation? | Available site wider Mixed use (including light industrial) allocation? | Available site wider Green Belt, automatic allocation? | Available site wider Green Belt, non-automatic allocation? | Available site wider Development Plan Areas (Dewsbury) allocation? | Available site wider Other non-development Plan Areas? (Dewsbury) allocation? | Available site wider Other non-development Plan Areas allocation? | Available site wider Brownfield Land (Dewsbury) allocation? | Available site wider Not Known allocation? | Available site wider None allocated? | Applications Received? | Applications Rejected? | Applications Pending? | Total Site Capacity | Total Site Capacity Adjusted | Completed in 2017 | Completed in 2018 | Completed in 2019 | Completed in 2020 | Completed in 2021 | Completed in 2022 | Completed in 2023 | Completed in 2024 | Completed in 2025 | Completed in 2026 | Completed in 2027 | Completed in 2028 | Completed in 2029 | Completed in 2030 | Completed in 2031 | Completed in 2032 | Completed in 2033 | Completed in 2034 | Completed in 2035 | Completed in 2036 | Completed in 2037 | Completed in 2038 | Completed in 2039 | Completed in 2040 | Completed in 2041 | Completed in 2042 | Completed in 2043 | Completed in 2044 | Completed in 2045 | Completed in 2046 | Completed in 2047 | Completed in 2048 | Completed in 2049 | Completed in 2050 | Completed in 2051 | Completed in 2052 | Completed in 2053 | Completed in 2054 | Completed in 2055 | Completed in 2056 | Completed in 2057 | Completed in 2058 | Completed in 2059 | Completed in 2060 | Completed in 2061 | Completed in 2062 | Completed in 2063 | Completed in 2064 | Completed in 2065 | Completed in 2066 | Completed in 2067 | Completed in 2068 | Completed in 2069 | Completed in 2070 | Completed in 2071 | Completed in 2072 | Completed in 2073 | Completed in 2074 | Completed in 2075 | Completed in 2076 | Completed in 2077 | Completed in 2078 | Completed in 2079 | Completed in 2080 | Completed in 2081 | Completed in 2082 | Completed in 2083 | Completed in 2084 | Completed in 2085 | Completed in 2086 | Completed in 2087 | Completed in 2088 | Completed in 2089 | Completed in 2090 | Completed in 2091 | Completed in 2092 | Completed in 2093 | Completed in 2094 | Completed in 2095 | Completed in 2096 | Completed in 2097 | Completed in 2098 | Completed in 2099 | Completed in 2100 | Completed in 2101 | Completed in 2102 | Completed in 2103 | Completed in 2104 | Completed in 2105 | Completed in 2106 | Completed in 2107 | Completed in 2108 | Completed in 2109 | Completed in 2110 | Completed in 2111 | Completed in 2112 | Completed in 2113 | Completed in 2114 | Completed in 2115 | Completed in 2116 | Completed in 2117 | Completed in 2118 | Completed in 2119 | Completed in 2120 | Further delays to the WNJCS review could put the Council’s 5-year housing land supply for the NRDA under significant strain. There is no mechanism within LPP2 to deliver any meaningful additional supply beyond the allocated sites to 2029 should delivery rates deliver below the housing trajectory. It is our preference that additional sources of housing supply are identified through LPP2 to safeguard against speculative, unplanned development should the housing levels fall below the required levels during the plan period.
**Other sources of supply:**

The Council intended to prepare a SHELAA to support LPP2 but we understand this was abandoned following the Council’s decision not to propose any new allocations are being made beyond those contained within the higher tier West Northamptonshire Joint Core Strategy (WNJCS). Instead, the scope was reduced to a focused economic land assessment/HELAA.

The Council has produced a suite of policies to deliver ‘above OAN’ levels of housing and support the rural communities outside of the two towns to 2029. Whilst the principle is welcomed, Catesby seek clarity on specifically what level of growth the Council considers could be expected to come forward from Policies LH2-LH7 and Policy H3 of the WNJCS (rural exception sites) to 2029.

For example, reliance upon windfall allowances continuing at a similar pace year on year is not justified. Unprecedented levels of growth from this source of supply have been experienced over the past 5-6 years as a result of the 5-year supply shortfall in the early years of the plan period which led to a plethora of speculative developments. Some of these are still being built out and once completed, it is reasonable to conclude that this supply source will significantly reduce.

Rural Exception Sites (Policy H3 of WNJCS) can only include a minimum amount of market housing as is essential to make the scheme financially viable where grant funding cannot be obtained. The delivery of rural exceptions housing has become increasingly challenging due to reduced public subsidy over the last 10 years.

The inclusion of Policy LH3 - Entry Level Exception Sites is supported but there is no reliable evidence to demonstrate the potential yield from this supply source given it has only recently been introduced under rNPPF 2018.

Village confines remain tightly drawn, particularly around the higher order settlements such as Middleton Cheney.

The narrow focus on starter homes in Policy LH2 to direct this only to brownfield sites is also limiting its potential to deliver new homes.

Generally, progress on Neighbourhood Plans in the district have been slow, noticeably at the larger settlements. Overall, as at July 2018, out of 83 settlements in the district, only 2 Made Plans exist within the district (in Kislingbury and Harpole – both Secondary Service Villages) with 1 currently being examined (Roade – Primary Service Village). A further 9 are at the early draft/emerging proposals stage with 2 having now ceased all work (Paulersbury and Yardley Gobion – both Secondary Service villages). Middleton Cheney is one of the 9 remaining designated areas and the Parish embarked on its Neighbourhood Plan in 2012 yet is still at the evidence gathering stage. At this stage there is no certainty as to whether the emerging Neighbourhood Plan will be a reliable source of additional housing supply to 2029, particularly when the LPP2 does not provide any clear direction for neighbourhood plans to deliver additional growth.

These factors combine to limit the potential delivery from ‘other sources of supply’. To ensure that sustainably located plan-led development comes forward over the remaining years of LPP2, it is considered appropriate to identify additional housing land now or include a policy that permits additional housing outside settlement boundaries should the supply fall below the required levels. This could be similar to the previous interim rural housing policy but with a clear preference to prioritising land at appropriate locations in the most sustainable settlements. This would provide more certainty and protect against further delays that are likely to occur with the WNJCS review.

In summary, we consider that the Council should take a more proactive approach to identifying additional housing sites in the LPP2 that could come forward in the event that housing supply falls below the required levels for 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.

Proposed Change:

The Part 2 Local Plan as drafted does not provide flexibility in the development strategy during the plan period and we consider that the approach should be adjusted to ensure a deliverable supply is maintained. Additional land should be identified now, to be brought forward in the event that supply falls below the required thresholds (our preference). Our case for land at Middleton Cheney is set out below.

Alternatively, an additional policy should be included to direct new housing towards the more sustainable settlements to include the following criterion: “If the housing land supply falls short of the required delivery rates at any given time during the plan period, in that circumstance sites adjacent to Primary Service Villages will be considered as a priority.”

Proposed Site Allocation: Land East of Waters Lane, Middleton Cheney

Catesby’s land interest at Middleton Cheney represents an achievable, suitable and deliverable site.

I enclose with this response a Site Location Plan and Vision Framework for Catesby’s land interest at land east of Waters Lane, Middleton Cheney. We consider the site is suitable for identification as land for housing should it be required during the plan period.

The site measures approximately 2.90 ha / 7.16 acres. It adjoins the current built-up area of Middleton Cheney, with existing residential development off Waters Lane, Slade Leas and the new development at Centenary Road. The enclosed Vision Framework demonstrates that the site is deliverable and capable of appropriately accommodating up to 50 dwellings.

The southern part of the site has previously been considered in the 2012 SHLAA Update undertaken by the West Northamptonshire Joint Planning Unit. It identified that the site is not subject to any environmental constraints and concluded that consideration could be given as part of future LDF Site Allocation DPD’s. There has been no change in circumstances that would affect this earlier assessment.

The site would be suitable for development now and can be delivered at any point in the plan period to 2029. There are no known constraints to the proposed identification of the site as a housing allocation. Safe access to the sites can be achieved off Waters Lane with sufficient visibility and the surrounding junctions and road network within the villages have sufficient capacity to accommodate any additional traffic generated. The site is located close to a range of amenities and services in Middleton Cheney. The entire site is 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 the site would provide significant benefits including provision of market and a range of affordable homes, publicly accessible open space on-site and contribute towards the local economy during the plan period. The site is achievable, suitable and deliverable and will boost the supply of housing and maintain a rolling 5-year supply of suitable housing sites throughout the lifetime of the plan.

Middleton Cheney is one of the four most sustainable village after the rural centres of Brackley and Towcester. It is capable of accepting further growth however the constrained nature of the settlement confines defined in the Local Plan means scope for further housing provision through draft Policy SS1 will be limited. The LPP2 as currently drafted fails to support the longer-term sustainability and viability of the village. The rNPPF 2018 paragraph 71 reinforces that planning policies should identify opportunities for villages to grow and thrive.
Table 2 below sets out the changes delivered in the period preceding the WNJCS/LPP2 from 2001 to 2011, a 1% change in the size of the village.

Table 2: Summary of 2001 and 2011 Census data: Dwellings

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<tr>
<td>Dwellings</td>
<td>1485</td>
<td>1499</td>
<td>+14</td>
<td>+1%</td>
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From 2011 to 2013 planning permissions resulted in consent for a further 168 new homes, triggered under NPPF paragraph 47. Going forward, the pipeline position for Middleton Cheney is low at only 15 homes at April 2018, 7 of which were not started and 8 of which were under construction. This represents a 0.9% increase in the housing stock (using the last recorded base date of 31 March 2013 comprising the 2011 census data at 1,499 dwellings plus 90 completions and 78 commitments = 1,667 dwellings). This is not a sound basis for maintaining the vitality of this rural community over the plan period.

The village does not have any underused or unviable employment sites adjoining the village confines for Policy LH2 to apply. The Neighbourhood Plan has slowed since the process commenced in 2012 and is yet to set out its intentions towards additional housing.

It is also our understanding that, whilst the population of South Northamptonshire is increasing, this is not true of all settlements and in some villages the population is declining despite a growth in the number of homes. This is apparent at Middleton Cheney which has experienced a decreasing household size coupled with an aging population. The following tables 3 and 4 summarises the relevant information on the population of the parish.

Table 3: Summary of 2001 and 2011 Census data: Population

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<tr>
<td>Middleton Cheney</td>
<td>3753</td>
<td>3597</td>
<td>-156</td>
<td>-4%</td>
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<tr>
<td>SNC</td>
<td>79,293</td>
<td>85,189</td>
<td>+5896</td>
<td>7%</td>
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Table 4: Summary of 2001 and 2011 Census Data: Age Structure

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<tbody>
<tr>
<td>2001</td>
<td>206</td>
<td>594</td>
<td>329</td>
<td>1052</td>
<td>974</td>
<td>332</td>
<td>266</td>
<td>39.24</td>
</tr>
<tr>
<td>2001 %</td>
<td>5.5</td>
<td>15.8</td>
<td>8.8</td>
<td>28.0</td>
<td>26.0</td>
<td>8.8</td>
<td>7.1</td>
<td></td>
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<tr>
<td>2011</td>
<td>154</td>
<td>495</td>
<td>338</td>
<td>800</td>
<td>1058</td>
<td>394</td>
<td>358</td>
<td>43.2</td>
</tr>
<tr>
<td>2011 %</td>
<td>4.3</td>
<td>13.8</td>
<td>9.4</td>
<td>22.2</td>
<td>29.4</td>
<td>11.0</td>
<td>10.0</td>
<td></td>
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<tr>
<td>SNC</td>
<td>4771</td>
<td>11794</td>
<td>7481</td>
<td>21027</td>
<td>25717</td>
<td>8096</td>
<td>6063</td>
<td>41.1</td>
</tr>
<tr>
<td>SNC %</td>
<td>5.6</td>
<td>13.8</td>
<td>8.8</td>
<td>24.7</td>
<td>30.2</td>
<td>9.5</td>
<td>7.4</td>
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Catesby consider that, where possible, additional allocations should be made of a reasonable scale in the larger villages. Development of the scale proposed for land east of Waters Lane (circa 50 homes) allows for a range of housing types to be delivered including affordable housing and for contributions to be made to social and other infrastructure. Catesby’s assessment of the local needs at the plan-making stage concludes that development on this scale is appropriate to meet the immediate identified needs of Middleton Cheney.

Identifying housing land of this size in the larger villages is a more sustainable approach to controlling the delivery of locally identified needs rather than smaller sites in less sustainable villages (which may be exempt from providing affordable homes under either local policy or the nationally within the Planning Practice Guidance).

Proposed Change: The Part 2 Local Plan should be revised to identify housing site(s) capable of delivering within the plan period. Catesby’s site at Middleton Cheney should be identified as a housing allocation.

**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 including Middleton Cheney.

We are supportive of the identification of Middleton Cheney as a Primary Service Village 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 concludes that Middleton Cheney is the most sustainable village in South Northants District in terms of access to services and facilities.

Whilst it is useful to have a settlement hierarchy that ranks settlements according to their size and their range of services and facilities, the effectiveness of Policy SS1 in guiding development is questionable where the village confines remain tightly drawn across the settlements.

For example, as currently drafted, this policy has limited effect in terms of sustainable growth for Middleton Cheney as there is little opportunity for further housing development within the village confines of Middleton Cheney as shown at Appendix 1: Proposals Maps of the Part 2 Local Plan. The only opportunity for additional residential development to meet local and other needs to 2029 would be on sites outside the village confines. This is evidenced by the planning permissions issued for residential schemes on the edge of the village – i.e. off Waters Lane and Banbury Road - over the past 5 years (when the housing supply for the District fell short of the identified need). It will be necessary to make other changes to the plan to make this policy effective.

Alternatively, in the absence of any allocations within the rural area, Policy SS1 could also recognise the role and function of the Primary Service Villages and their relative sustainability as a focus in meeting any shortfall in housing supply throughout the plan period if the need arises. This 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.
Proposed change to Policy SS1: Additional text - If the housing land supply falls short of the required delivery rates at any given time during the plan period, in that circumstance sites adjacent to Primary Service Villages will be considered as a priority.”

Policy SS2: General Development Principles

Policy SS2: General Development Principles states that planning permission will be granted for developments which comply with all the stated criteria unless material considerations dictate otherwise. We welcome the acknowledgement that there may be circumstances where development can be considered acceptable in spite of all criteria not having been met. For example, any development to the edge of villages to meet a locally identified need may be preferable on higher grade agricultural land at second tier of the settlement hierarchy than on lower grade land in a less sustainable location.

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 no criteria within the plan to clarify when it may be considered ‘relevant’.

Proposed Change to Policy SS2: Omission of reference to health impact assessment as it is not justified under national requirements.

Policy LH1: Development within Town and Villages Confines

We note the assessment criteria for residential development within town and village confines under limb 1 of Policy LH1.

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. This policy text is misplaced. Policy LH1 is titled “Development within town and village confines” [our emphasis]. This limb deals with sites beyond village confines. The requirements for accepting development outside of village confines are set out in the individual policies listed at Limb 3 and there is no need to duplicate reference to these under Policy LH1. It is considered that Part 3 of Policy LH1 should be omitted in its entirety.

The implications of the deletion of Limb 3 is the removal of reference to the role of Neighbourhood Plans. As set out elsewhere in this representation, the effectiveness of Neighbourhood Plans in delivering additional growth by 2029 is limited, given the poor take-up to date and the lack of any incentive to do so given the Council’s current housing supply position against WNJCS targets.

In the pre-submission draft at Reg 18 stage, the Council also included a LOAN Policy (Locally Objectively Assessed Need). Whilst the drafting was flawed, the general principle was supported, particularly when the take-up of Neighbourhood Plans has been poor. Rather than revise the LOAN policy, the Council has opted to remove it. Some form of similar policy dedicated to this and/or Neighbourhood Plans as an additional source of supply should be included to provide a clear steer to local communities preparing Neighbourhood Plans and decision-makers in the development management process. Otherwise the LPP2 runs the risk of having a counter effect on achieving any localised growth at the village level. There is no clear guidance for local parishes who may be contemplating or progressing a Neighbourhood Plan. A specific draft policy could recognise the Neighbourhood Plan process to give a positive steer to a
Neighbourhood Plan Group to properly plan for its area whilst setting out clear exceptions for additional supply.

Proposed Change to Policy LH1: The policy content is not clear and duplicates reference to other policies. Limb 3 should be deleted.

Consequential change: An additional Policy should be drafted titled: “Development beyond town and Village confines” as a precursor to Policies LH2-LH9. This would list these exceptions plus specific reference to encouraging development within Neighbourhood Plans and Locally Objectively Assessed Need where it is shown to exist.

Proposed Additional Policy: Reproduce Limb 3 of draft Policy LH1 plus additional text:

- A housing scheme to meet a clear objectively assessed local housing need (HNA)

Policy LH2: Starter Homes

We note the criteria as set out under Policy LH2 for the delivery of starter homes outside of settlement confines. It is worth noting the inconsistency in the wording throughout the draft plan, sometimes referring to ‘village confines’; sometimes using “Settlement confines”. There should be a consistent approach throughout the Plan.

We support the introduction of this policy to facilitate starter homes within the rural area. We object to the restriction under Limb 2 that only industrial and commercial land qualifies – whether unviable or underused; or, where market housing is required to support such development, only previously developed land qualifies. Given the character of the villages this is unlikely to yield any meaningful supply. There is no accompanying evidence demonstrating how effective this is likely to be and the potential quantum anticipated from this policy. As written, this policy is unlikely to result in any boost to housing supply to the rural area to 2029.

The limitations on the type of land that Policy LH2 applies to is contrary to the starter home initiative. Paragraph 4.19 of the Housing White Paper (Fixing our Broken Housing Market, published February 2017) states that clarity will be provided to allow Starter Homes on rural exception sites with appropriate local connection tests. It does include a section on encouraging starter homes on underused and unviable brownfield sites which could benefit from the Government’s Starter Home Land Fund but this is not exclusive.

Proposed Change to Policy LH2: The restrictions on the type of qualifying land for starter homes and any market homes is not justified and overall the policy is unlikely to be effective in delivering new homes. Limb 1(ii) and limb 2(i) should be deleted as they are too prescriptive and do not reflect the full spirit of the Housing White Paper or rNPPF 2018
Policy LH3: Entry Level and Single Plot Exception Sites

Whilst we support the draft policy, there is no evidence to underpin the scale of development that this policy is seeking to deliver. Its effectiveness to boost the rural housing supply is not clear.

Policy LH5: Self and Custom Built Homes

As mentioned at the Reg 18 stage, the specific reference to the reserved matters planning applications for such plots needing to be made by the householder should be deleted. It does not allow sufficient flexibility, for example it would rule out full applications; nor, does it reflect the fact that an application for the approval of reserved matters pursuant to an outline planning permission could be made by the principle developer on behalf of the custom builder.

Policy LH6: Specialist Housing and Accommodation Needs

This policy is supported to reflect the identified need for older persons housing within the district. We support the acknowledgement that where suitable sites within village confines are not available, edge sites will be considered at the larger villages.

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.

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.

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(Accessibility Category 2) and a further 5% to M4(Accessibility Category 3); Affordable dwellings – 40% to M4(Accessibility Category 2) and a further 5% to M4(Accessibility Category 3). We comment as follows:
National Context:

In 2013, The Housing Standards Review (the Review) was launched which sought to simplify and rationalise the raft of housing standards which local authorities applied to development. At the heart of the Review was a desire to reduce developer costs and create attractive conditions to significantly boost housing delivery. The industry has been intrinsically involved nationally in the preparation of the amendments to Building Regulations and incorporation of National Space Standards.

The outcome of the Review was the establishment via Building regulations of mandatory baseline standards which apply nationwide to developments. The Code for Sustainable Homes was also withdrawn. Additionally, the Government created a series of enhanced Optional Standards relating to access and water, along with a new optional national standard of National Space Standards.

Initially the industry had concerns that the enhanced standards have the potential to have significant implications in terms of product range, build cost, affordability, cumulative policy burden, viability and ultimately housing delivery. In response, the Government confirmed that the enhanced standards were intended to be optional and that they would only be needed and viable in certain local circumstances. Otherwise they would have been mandatory in Building Regulations across the Country.

The enhances standards were introduced on a ‘need to have’ not a ‘nice to have’ basis and policy safeguards were put in place. The new enhanced standards could only be introduced via a new Local Plan which is a suitable forum to discuss local need, viability and timing, clear evidence of need had to be demonstrated and the consequential impact upon viability had to be considered.

New Regime and Policy Context:

The new regime was launched by a Ministerial Statement dated 25th March 2015 and the creation of a new section on optional technical standards in the PPG. This was also underpinned by existing policy within the 2012 NPPF. Paragraphs 174 and 177 of the NPPF make it clear that via the Local Plan process LPAs should assess the cumulative impact of policy burden, including housing standards, to ensure that it does not put implementation of the plan at risk.

The Ministerial Statement set out “The optional new technical standards should only be required through any Local Plan Policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPF and Planning Guidance”.

Accompanying this, paragraph 001 reference ID: 56-001-20150327 of the PPG made it clear that LPAs will need to gather evidence to determine whether there is a need for additional standards in the area and justify setting appropriate policies in their Local plans. Paragraph: 002, Reference ID: 56-002-20160519 of the PPG confirms that LPAs should consider the impact of using these standards as part of their Local Plan Viability Assessment.

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 meets Accessibility 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. This simply will not be the case and it will be likely that the demand for Category 2 or 3 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 within the Limb 2 (a) (I) of Policy LH10, we consider that it is too rigid to specify actual percentages of dwellings rather than targets to aim for. 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.

The 50% figure does not identify a need for 50% of new build properties to have enhanced accessibility. There is no evidence to suggest that this need is to be fully met through new housing. No assessment of the suitability of the existing stock has been undertaken to determine the number of existing dwellings that are currently complying with, or can otherwise meet the requirements of this policy or need generated by the aging population across the plan period.

Planned new specialist housing projects across the plan period also need to be considered and factored in as these reduce the need for new dwellings to accommodate the total need.

Consideration of lifestyle choice of people wanting to stay in their own homes is highly material. A full assessment of the impact and delivery of this policy needs to be considered. The policy will only effect applications being considered and approved after the policies adoption, meaning that committed sites that already benefit from detailed planning permission will not be subject to such standards. The impact of this policy is therefore eroded.

Based on the above, we consider that Policy LH10 is unsound as the policy is unjustified in terms of its evidence base and inconsistent with national policy.

**Proposed Change to Policy LH10:** Limb 2 of Policy LH10 should be deleted.

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

**Proposed Change to Policy LH10:** The reference to the percentage requirements for Accessibility Category 2 and 3 are not justified and should be targets, not a fixed requirement, and linked to identified need.

**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. Limb 1 is too prescriptive and contradicts other instances envisaged by Limb 4 for example. The text should be updated from “must be provided” to “will be sought”.

Whilst it is useful for the Council to provide guidance on the amount of open space, sport and recreation facilities required, there will be circumstances 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 and the policy is ineffective.

**Proposed Change to Policy GS1:** Change emphasis from “must be provided” to “will be sought” in Limb 1.
Appendix 1: Proposals Map

Policy SS1 states that residential development will be appropriate within town and village confines. A change to the village confines is required to include additional housing sites to provide a buffer for development. In this case, draft Policy SS1 would then be effective. We propose that the village confines for Middleton Cheney should be redrawn around the land east of Waters Lane, Middleton Cheney. The site is available, suitable and deliverable for circa 50 homes.

Proposed Change:

Alteration to the Villages Confines Proposals Map for Middleton Cheney at Appendix 1 to include land to the East of Waters Lane, Middleton Cheney.

Attachments: Vision Document and Location Plan – Waters Lane

Stacey Rawlings
Bidwells

Dated 15.11.18