Do you consider the South Northamptonshire (Part 2) Local Plan to be sound?
No
If NO, is this because it is:

<table>
<thead>
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<th>Issue</th>
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<tr>
<td>Not positively prepared</td>
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<td>Not justified</td>
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<td>Not consistent with national policy</td>
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To which part of the Local Plan does this representation relate?

**Paragraph number:** 4.2.3, 4.2.3, 4.2.4, 4.2.5

**Policy:** Policy LH1

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

The West Northamptonshire Joint Core Strategy (WNJCS) was adopted on the 15th December 2014. The WNJCS sets out the long term vision for the whole of the area covered by South Northants, Daventry and Northampton Councils. This Plan provides the overall scale and distribution of housing to be delivered in South Northants over the plan period.

The overall housing requirement set out in the West Northamptonshire Joint Core Strategy for the rural areas (2011-2029) is 2,360 dwellings. The West Northamptonshire SHMA 2009 was based upon the housing requirement set out in the East Midlands Regional Plan. The East Midlands Regional Plan was revoked in March 2013.

Furthermore, it was acknowledged by the Inspector for the WNJCS that there was need to review the Plan to ensure that the local policy framework remains up to date in the light of changing economic, social and environmental issues and new evidence (e.g. housing need). The WNJCS, at paragraph 3.18, confirms that the Councils are committed to undertaking a review of the Plan, with the aim of having an adopted plan in place by 2020. However, the latest agreed Local Development Scheme...
(LDS) between the Councils indicates that the revised WNJCS will not be adopted until, at least, January 2022.

With the above in mind, the SMV consider that the SHMA and housing figures in the WNJCS are out of date and not based on up to date evidence of the housing requirements of the area. A new updated housing needs assessment for the area would be carried out as part of any review into the WNJCS. The Government’s standardised approach to calculating OAN sees an increase in the overall housing requirement for South Northants to 491 dwellings a year (Source: Application of proposed formula for assessing housing need, September 2017). Furthermore, the Government is currently consulting on revisions to the standard methodology following the publication of the lower 2016-based household projections. The policy direction remains clear with the aim to meet the higher national housing target of 300,000 homes per annum by the mid-2020s.

South Northants are currently progressing the Local plan (Part 2) to meet the housing requirements set out within the WNJCS. It is acknowledged by the Council, at paragraph 4.2.4 of the South Northamptonshire Local Plan (Part 2) Regulation 19 Consultation Paper that the rural housing requirement (i.e. around 2,360 dwellings) has already been met. Therefore, the Council consider that there is no need to allocate sites for development in the rural area. Policy LH1 ‘Development within Town and Village Confines’ only supports development in the rural areas within the village confines. Furthermore, development outside of the villages will only be acceptable via allocations in a Neighbourhood Plan and exception sites.

Accordingly, the SMV propose that the Council’s approach to not allocate any additional housing growth in the rural areas in the Local Plan (Part 2) is flawed given that it is based upon meeting the out of date housing requirements in the WNJCS. The Plan is therefore unsound given it is not positively prepared and fails to meet national policies (i.e. the most up-to-date OAN).

Recommendation for changes to the Local Plan (Part 2):

The Society of Merchant Venturers (SMV) suggests that the Local Plan (Part 2) provides an opportunity to identify additional growth in the rural areas either through allocating new sites for development or a contingency plan (i.e. through safeguarding land/ identifying reserve sites) that are needed in the short term (during the preparation of the revised WNJCS) to address the potential increase in housing need from the more up to date housing evidence. The Sustainability Appraisal will also need to be updated to assess the options for growth.

In this respect, Deanshanger is identified as a ‘Principle Service village’ and is one of the most sustainable villages in the District – paragraph 3.2.4 of the Plan confirms that primary service villages have the highest level of services and facilities. Accordingly, Deanshanger is capable of accommodating a significant proportion of this housing requirement.

The SMV’s land at Puxley Road and Wicken Road are immediately adjacent to the built-up area of Deanshanger – see attached Plans. As a result, it is considered that all (or part) of our client’s land at Deanshanger could help meet any identified housing shortfall and be allocated for development or reserve sites.
The land at Puxley Road could accommodate up to 250-300 dwellings (or part of the site for 75-120 dwellings). The land at Wicken Road is suitable for around 40 dwellings. Both sites are suitable, available and achievable for residential development. Moreover there are no significant constraints which will prevent development on the sites. The sites are also within the sole control of the SMV which will facilitate their timely development.

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

Yes, I wish to participate at the oral examination.

If you wish to take part at the oral part of the examination, please outline why you consider this to be necessary (please note the inspector will determine who will be invited to be heard at the examination hearing(s)).

We wish to appear at the examination to present our evidence and technical information to support these representations.