

Strategic Plan  
West Northamptonshire Council  
The Guildhall  
St Giles' Square  
Northampton  
NN1 1DE

SENT BY E-MAIL ONLY TO  
[strategicplan@westnorthants.gov.uk](mailto:strategicplan@westnorthants.gov.uk)

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Dear Sir / Madam

## **WEST NORTHAMPTONSHIRE STRATEGIC PLAN (WNSP) – SPATIAL OPTIONS CONSULTATION**

### **Introduction**

Thank you for consulting with the Home Builders Federation (HBF) on the above-mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. The following responses to specific questions in the WNSP Spatial Options document have been submitted via the Council's online consultation portal.

**Question 7 : Do you agree that the findings of the HENA reflect the housing and / or economic needs of the area? (Yes / No). If not, please provide evidence as to what you think the housing and economic needs of the area should be.**

As set out in the 2021 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need and any needs that cannot be met within neighbouring areas can be met over the plan period (para 66). The determination of the minimum number of homes needed should be informed by Local Housing Needs (LHN) assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 61). In West Northamptonshire, there is no justification for the use of an alternative methodological approach. The latest NPPG sets out the standard methodology for calculating the LHN figure (ID 2a-004-20201216).

West Northamptonshire's minimum LHN between 2020 – 2050 is set out in the Table below :-



	Daventry	Northampton	South Northants	West Northants
Using 2014 SNHP, 2020 as the current year & 2019 affordability ratio	10,440 dwellings (348 dwellings per annum)	38,640 dwellings (1,288 dwellings per annum)	15,090 dwellings (503 dwellings per annum)	64,170 dwellings (2,139 dwellings per annum)
Using 2014 SNHP, 2021 as the current year & 2020 affordability ratio	10,260 dwellings (342 dwellings per annum)	38,490 dwellings (1,283 dwellings per annum)	15,210 dwellings (507 dwellings per annum)	63,960 dwellings (2,132 dwellings per annum)

As set out in the NPPG, the LHN is calculated at the start of the plan-making process, however, this number should be kept under review until the WNSP is submitted for examination and revised when appropriate (ID 2a-008-20190220). The most up to date minimum LHN for West Northamptonshire is 2,132 dwellings per annum.

The Government's standard methodology identifies the minimum annual LHN. It does not produce a housing requirement figure (ID : 2a-002-20190220). LHN assessment is the minimum starting point. The NPPG explains that "*circumstances*" may exist to justify a figure higher than the minimum LHN (ID 2a-010-20201216). The "*circumstances*" for increasing the minimum LHN are listed in the NPPG, but the NPPG emphasises that the listed "*circumstances*" are not exhaustive. The listed "*circumstances*" include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery / assessments of need, which are significantly greater than the outcome from the standard methodology.

West Northamptonshire falls within the Oxford - Cambridge Arc, where the Government has ambitions to promote significant economic and housing growth by 2050. The Government's ambitions for the Oxford - Cambridge Arc include up to one million high-quality new homes and maximising the economic potential of the area to become an economic asset of international standing. There are significant existing commuter flows from Northampton and South Northamptonshire to Milton Keynes. West Northamptonshire also benefits from key strategic transport infrastructure including linkages to the M1, M40 and M6. The WNSP is an opportunity to positively respond to the Government's proposals for the Oxford - Cambridge Arc. The need for an increased labour supply to meet increasing employment demand will lead to a need for new homes otherwise economic growth may become constrained. The Council should be seeking to achieve a sustainable balance between employment and

housing growth. The Council should be ambitious and propose a housing requirement above the minimum LHN for West Northamptonshire.

**Question 8 : Do you agree that there is potential for directing further development at Northampton, as the principal urban area, as part of the spatial strategy for West Northamptonshire? (Yes / No). Please provide comments to support your answer.**

The HBF agree that the preferred Spatial Strategy for West Northamptonshire is likely to comprise of a combination of the Council's potential Spatial Options because of disadvantages associated with pursuing any one potential Spatial Option in isolation. The preferred Spatial Strategy should ensure the availability of a sufficient supply of deliverable and developable land to deliver the housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of 5 Years Housing Land Supply (5YHLS) and achieve Housing Delivery Test (HDT) performance measurements.

An overly urban focussed Spatial Strategy limits the potential number of development sites (also see HBF answers to Questions 17, 23, 26 & 29 below). If development sites are large scale Sustainable Urban Extensions (SUEs) and / or New Settlements, there may be long lead in times for the commencement of on-site development and build up to optimum delivery rates. It is known that SUEs allocated in the Northampton Related Development Area, Northampton and Daventry in the adopted West Northamptonshire Joint Core Strategy (WNJCS) have not progressed as quickly as expected. There are significant shortfalls in housing delivery. Therefore, it is critical that an accurate assessment of availability, suitability, deliverability, developability and viability is undertaken. The Council's assumptions on lead in times and delivery rates should be correct and supported by parties responsible for the delivery of housing. SUEs and New Settlements should be complimented with smaller non-strategic sites, which will ensure a continuous HLS in the short to medium term.

As the principal urban area, further development could be directed to Northampton. The HBF have no comments on the Council's five potential Spatial Options and these representations are submitted without prejudice to any comments made by other parties. There are four potential Spatial Options for development North of Northampton at Option 1a - North of Buckton Fields for approximately 2,000 dwellings, Option 1b - East of Boughton for approximately 1,500 dwellings, Option 1c - West of Moulton for approximately 3,000 dwellings, Option 1d - North of Moulton for approximately 1,600 dwellings and one potential Spatial Option 1e - Northampton South-East for approximately 3,000 dwellings.

The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-

strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market. Under the 2021 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 69a). The Council should also provide some headroom between its minimum housing requirement and overall HLS. Whilst there is no numerical formula to determine the appropriate quantum of headroom, if the WNSP is highly dependent upon one or relatively few SUEs and / or New Settlements and a limited number of geographical locations then greater numerical flexibility is necessary than where HLS is based on a more diversified portfolio of sites.

**Question 17 : Do you agree that there is potential for directing further development at Daventry, as a sub-regional centre, as part of the spatial strategy for West Northamptonshire? (Yes / No). Please provide comments to support your answer.**

Further development could be directed to Daventry, as a sub-regional centre. The HBF have no comments on the potential Spatial Option and these representations are submitted without prejudice to any comments made by other parties. The potential Spatial Option is 2a. North of Daventry for approximately 1,200 dwellings (also see HBF answer to Question 8 above).

**Question 23 : Do you agree that there is potential for directing further development at Brackley and Towcester, as rural service centres, as part of the spatial strategy for West Northamptonshire? (Yes / No). Please provide comments to support your answer.**

Further development could be directed to Brackley and Towcester, as rural service centres. The HBF have no comments on the potential Spatial Option and these representations are submitted without prejudice to any comments made by other parties. There are two potential Spatial Options, which are Option 4a - Brackley North West Expansion for approximately 3,000 dwellings and Option 4b - Towcester South & Racecourse Expansion for approximately 4,250 dwellings (also see HBF answer to Question 8 above).

**Question 26 : Do you agree that new settlements have a potential role in delivering growth as part of the spatial strategy for West Northamptonshire? (Yes / No). Please provide comments to support your answer.**

New Settlements could be considered as part of the preferred Spatial Strategy, however significant forward planning will be required. As set out in the 2021 NPPF, where a New Settlement forms part of the Spatial Strategy, policies should be set within a vision that looks further ahead (at least 30 years) to account for the likely timescale for delivery (para 22). The HBF have no comments on the potential Spatial Options and these representations are submitted without prejudice to any comments made by other parties. There are two potential Spatial Options, which are Option 5a - Land to South of Long Buckby for approximately 1,280 – 5,000 dwellings and Option 5b - Milton Keynes North West (Old Stratford) Expansion for approximately 6,000 dwellings (also see HBF answer to Question 8 above).

**Question 29 : What approach do you think the WNSP should take to development in the rural areas, in particular the level of growth that may be appropriate and where that growth could be best accommodated?**

In West Northamptonshire, 44% of the population live outside the urban area of Northampton. In the former South Northamptonshire and Daventry Districts, most residents live in the rural areas outside the market towns of Brackley, Daventry and Towcester. The preferred Spatial Option should meet the housing needs of both urban and rural communities. As set out in the 2021 NPPF “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services” (para 79) (also see HBF answer to Question 8 above).

**Conclusions**

For the WNSP to be found sound under the four tests of soundness as defined by the 2021 NPPF (para 35), the WNSP must be positively prepared, justified, effective and compliant with national policy. It is hoped that these responses are helpful to the Council in preparing the next stages of the WNSP. As the WNSP preparation progresses, the HBF look forward to submitting further representations during later consultations, in the meantime if any further assistance or information is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**