

[REDACTED]

From: Ward, Ben <[REDACTED]>
Sent: 14 June 2019 15:30
To: Planning Policy
Subject: NLP2 SUBMISSION DRAFT
Attachments: NBC Regulation 19 Response.docx

Dear Sir/Madam

Please see the attached representation.

Kind Regards

Ben Ward
Strategic Planning Manager
Persimmon Homes Midlands
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Bedford Road
Northampton
NN4 7XD
[REDACTED]
www.persimmonhomes.com

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Persimmon Homes Limited is registered in England number 4108747, Charles Church Developments Limited is registered in England number 1182689 and Space4 Limited is registered in England number 3702606. These companies are wholly owned subsidiaries of Persimmon Plc registered in England number 1818486, the Registered Office of these four companies is Persimmon House, Fulford, York YO19 4FE.

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REPRESENTATION FORM FOR THE NORTHAMPTON LOCAL PLAN PART 2 PROPOSED SUBMISSION DRAFT (REGULATION 19 CONSULTATION)

Northampton Borough Council is preparing a Local Plan Part 2 for the Borough which will supplement the West Northamptonshire Joint Core Strategy and will replace Saved Policies in the Northampton Borough Council Local Plan (1997). The Local Plan Part 2 will cover the period to 2029. This stage is the Proposed Submission Draft Local Plan Part 2 (Regulation 19) and is the version of the plan that the Council intends to submit to the Planning Inspectorate for independent examination.

This form should be used to make representations on the Northampton Borough Council Local Plan Part 2 Draft Submission.

You can submit your representation online using our electronic form through the link below:

www.northampton.gov.uk/lp2proposedsubmission

A downloadable version (MS Word) is also available on the same page.

Under the General Data Protection Regulation (GDPR), Northampton Borough Council needs to inform you of the reasons why we are capturing your data and what we will do with your data. Any personal data collected and/or processed will be dealt with in accordance with the Data Protection Legislation and the Council's Data Protection Policy. Data is held securely and accessed by, and disclosed to, only individuals where relevant to this policy / procedure.

View Northampton Borough Council's Privacy Policy

here: <https://www.northampton.gov.uk/info/200031/data-protection/175/data-protection>

Please note that it is not possible for representations to be considered anonymously. Representations will be published on the consultation website and included as part of the submission to the Inspector. Address and contact details will be removed from published responses.

I agree to the Council collecting my personal data so that they can process my reply to the Northampton Local Plan Part 2 Proposed Submission Draft Regulation 19.

Yes (please tick)

**Please complete and submit by 5pm on Friday 14 June 2019.
Responses received after this time will not be accepted**

Ref:

(For official use only)

This form has 2 parts:

Part A Personal details

Part B Your representation(s).

Please fill in a separate sheet for each representation you wish to make

Part A: Personal Details

Q1: Are you making this representation as? (Please tick as appropriate)

- a) Resident or member of the general public
- b) Local Authority or Town/Parish Council
- c) Landowner
- d) Agent / Consultant (on behalf of)
- e) Other organisation (please specify which type of organisation below):

Developer

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in column 2.*

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First name	Ben	
Last name	Ward	
Job title (where relevant)	Planning Manager	
Organisation (where relevant)	Persimmon Homes	
Address line 1	3 Waterside Way	
Line 2	Bedford Road	
Line 3		
City / Town	Northampton	
County	Northants	
Postcode	NN4 7XD	
Telephone number		

Email (if provided we will always contact you this way)



Email (if provided we will always contact you this way)		
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Part B: Representation(s)

Please use a separate sheet for each representation

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Please note all comments will be made publicly available. If you do not have sufficient space in the box, please continue on a separate sheet or expand the box.

2: Do you consider the Northampton Local Plan Part 2 to be legally compliant?	Yes	N/A	No	N/A
If NO , is this because it is: (please tick all that you think apply)				
Not prepared in accordance with the Local Development Scheme				
Not prepared in accordance with the Statement of Community Involvement				
Not consistent with the regulatory requirements for consultation				
Not compliant with the duty to cooperate				
Not accompanied by a compliant Sustainability Appraisal				

2 (1): Please give details of why you consider the Northampton Local Plan Part 2 Submission Draft document is not legally compliant. Please be as precise as possible.

No comment

3: Do you consider the Northampton Local Plan Part 2 to be sound?	Yes		No	X
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3 (1): If NO, is this because it is: (please tick all that you think apply)	
Not positively prepared	
Not justified	X
Not effective	X
Not consistent with national policy	X

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
Policy 13 – Type and Mix of Housing		Policy 13	
Policies 15 & 24		15 & 24	X

4 (1): Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Policy 13:

Policy 13 requires the provision of self-build and custom build housing to contribute towards meeting the evidenced demand for such housing through sites of more than 100 dwellings. Firstly, there is significant ambiguity as to what proportion of such sites would need to include land for self-build housing. If the provision of this land is to meet the “evidenced demand”, then there is a lack of clarity as to how that will be assessed through planning applications or distributed across the sites where the policy is engaged. This will make the application of the policy through the development management process impractical and will not provide suitable clarity for decision-takers. Secondly, we would suggest that requiring the provision of self-build plots through large-scale housing developments is not an effective approach to ensuring the provision of such properties. Strategic housing sites cannot be brought forward in a comprehensive way when subject to such a policy requirement as there is no way to control adherence to design code or phasing requirements. Such plots are also exempt from Section 106 contributions which reduce the funds available for critical infrastructure. Thirdly, the completions from self-build plots are slow to materialise if they are completed at all as the completion of such homes are very vulnerable to the economic circumstances of the individual builder. This slow rate of delivery causes practical and management problems such as builders attending site at unspecified hours, the storage of materials in inappropriate places, and customer dissatisfaction when the construction of self-build homes continues longer than other market homes on the same site.

In terms of the quantitative requirement for such homes over the remainder of the plan period we would expect the threshold in the policy to correspond to the quantitative need for such dwellings over the plan period to 2029. It is not clear through the policy as currently drafted how the proposed threshold corresponds to the overall need. In its current form the policy requirement is not justified and the provision in relation to the requirement of self-build plots should be removed for plan soundness. In the event the policy is retained, we would suggest a qualification within the policy text that should self-build plots fail to be taken up within a reasonable time period that they can be delivered as standard housing.

In relation to the proposed introduction of enhanced accessibility standards we would observe that in a Regulation 19 publication plan there should be clarity about the proportion of dwellings required to meet M4(2) otherwise it is impossible for consultees to comment on justification behind the requirement in an informed way. Similarly the way in which the policy is drafted in its current form does not nominate a threshold at which the policy applies. As currently drafted these provisions are ineffective. In relation to the proposed M4(3) standards, Policy 13 requires a proportion of market housing to meet these standards which is in clear contradiction to the Planning Practice Guidance (PPG) which states that “local plan policies for

wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.” (Paragraph: 009 Reference ID: 56-009-20150327). This limb of Policy 13 is therefore contrary to national policy in should be removed for plan soundness.

Policies 15 & 24

Whilst we do not have any comments on the soundness of these policies per se, we are concerned about how they’re given effect on the policies map. The policies map purports to allocate a proportion of the Dallington Grange Sustainable Urban Extension (SUE) site as safeguarded employment land. As the Council will be aware, this site has secured resolution to grant planning permission for 3000 dwellings and associated infrastructure. Whilst employment land forms part of those proposals, there are detailed parameters plans (including land use) which show the location of the employment provision on the site and the policies map does not correspond to these. Rather, the safeguarded employment land as shown on the policies map sits on land that is allocated for and has resolution to grant planning permission for residential development and structural landscaping. We would also suggest that the green infrastructure designation which crosses Dallington Grange broadly following the railway line does not correspond to what the Council has resolved to grant planning permission for. In general, we would consider it necessary to show the SUEs allocated through the West Northamptonshire Joint Core Strategy (2014) on the policies map so it is clear to decision-takers and stakeholders how the designations in the Part 2 Local Plan relate to those in the adopted JCS.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

SUSTAINABILITY APPRAISAL

5. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number).	
Paragraph	
Comments	

HABITATS REGULATIONS ASSESSMENT

6. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number).	
Paragraph	
Comments	

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7: 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?

No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination	X
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8: If you wish to take part at the oral 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))

Persimmon Homes is a major national housebuilder and has interests in Bedford Northampton. We are concerned that certain proposed development management policies are supported by insufficient evidence to justify the significant cumulative burden that they will result in. These prospective policies and the basis for them need to be rigorously tested at examination and Persimmon as a large developer active in the area wish to be part of this discussion.

9: Please tick a box if you wish to be notified of further progress of the Local Plan Part 2 (please tick all that apply)

When the Northampton Local Plan Part 2 has been submitted for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended)	X
When the report of any person appointed to carry out an independent examination of Northampton Local Plan Part 2 is published	X
When the Northampton Local Plan Part 2 has been adopted	X
Other (please specify)	X

10: Signature	Ben Ward	Date	14/06/2019
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**Thank you for taking the time to complete the form.
Please return it to:**

Email: [REDACTED]

By post or by hand to:
Northampton Borough Council
Planning Policy, The Guildhall, St Giles Square, Northampton, NN1 1DE
Equality Monitoring Form

To ensure that the council's equality policy is operating effectively, we would be grateful if you could complete this monitoring form. However, you are not obliged to answer any of these questions.

Any personal information will be treated in the strictest of confidence. It is for monitoring purposes only and will not be shared with any other individual or organisation.

