

Mike Burgess

From: Ellie Gingell <[REDACTED]>
Sent: 09 November 2017 14:33
To: Planning Policy
Cc: Andy Darcy; Adrian Colwell; Jennie Johnson
Subject: Northampton Local Plan Part 2 - sites consultation: Response on behalf of South Northamptonshire Council
Attachments: 171402 SNC Response to NBC Part 2 consultation.pdf
Follow Up Flag: Follow up
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Dear Paul,

Please find attached the response to the current Local Plan Part 2a consultation, which runs until Monday 13th November. Should you have any questions, please do not hesitate to contact Andy D'Arcy.

Kind regards,

Eleanor Gingell
Neighbourhood Planning Officer
South Northamptonshire and Cherwell Council

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Ask For: Andy D'Arcy
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Date: 08 November 2017

By email: [REDACTED]

Dear Paul,

Re: Northampton Borough Council Part 2a Local Plan: Sites Consultation

South Northamptonshire Council welcomes the proactive and helpful work that Northampton Borough Council has undertaken to assess sites within the administrative boundaries of Northampton and identify sites for further consideration as part of the Local Plan process.

The council also welcomes the acknowledgement of the need to identify and 'kick start' delivery within the Borough and the need for flexible policies.

Whilst broadly supportive of the consultation, and the process, South Northamptonshire has some detailed concerns on the document. Detailed comments are set out in **Annex A**. These concerns include the way in which sites have been assessed and the approach taken to windfall development. These matters are considered crucial to ensuring that there is a robust evidence base both for plan making and decision taking within the Borough.

At present, we are concerned that the exclusion of sites smaller than 5 dwellings, together with a generous windfall allowance is likely to leave the area open to challenge and undermine the certainty to the Local Plan process. We draw attention to the proposals within the Government's Housing White Paper that Local Plans should seek to allocate at least 10% of their housing requirement on sites of 0.5ha or less. Should this proposal be taken forward as part of the wider suite of changes to National Policy expected in Spring 2018, we have a concern that Northampton will not have collated sufficient evidence for its Local Plan.

It is important to reiterate that South Northamptonshire Council remains concerned by the persistent under delivery in the Northampton and Related Development Area (NRDA) and the potential implications this has for the wider area.

South Northamptonshire Council reiterates its call for the Borough to prepare a robust Delivery Plan that sets out how the current five-year land supply position will be addressed including under-delivery in previous years. This must make a realistic assessment of the contribution that windfall development will make, and the speed at which sites on previously developed land will come forward.

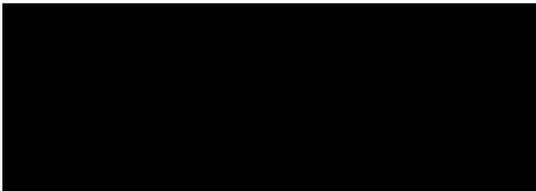
South Northamptonshire takes a pragmatic view to delivery within the NRDA and understands the challenges that arise from the speed of delivery from larger SUEs. Within the South Northamptonshire draft Part 2 Local Plan we have detailed proposals to allow for development adjoining the Borough Boundaries where this would not undermine the delivery of the overall spatial strategy and is of a small scale. This approach is not a means by which potentially difficult decisions by the Borough in meeting its own need can be avoided, but are a recognition that the challenges faced can lead to positive action by neighbours to avoid 'unplanned development' and the need for us to cooperate to deliver Government Objectives.

Our preference for delivering housing to meet Northampton's own needs remains for action to be taken within the Borough Boundary where it is best placed to contribute to wider regeneration and sustainable development objectives which strengthen the town as a whole.

Notwithstanding the above, South Northamptonshire remains committed to working positively and proactively with Northampton Borough to deliver the homes and other development.

I hope our comments on the document are clear and helpful. As always, should you have any questions, we would be happy to discuss these as part of our ongoing commitment to working positively and proactively.

Yours Sincerely,



Andy D'Arcy
Planning Policy and Growth Strategy Manger

Annex A:

Detailed comments in response to the Consultation:

- Para 4.3 states ‘a number of sites not currently allocated for employment were suggested in comments as being suitable for employment. Some of these have been actively promoted for employment’. It is recognised that there is a need to ensure suitable sites are made available for all uses. Sites not presently allocated for employment, but proposed for these uses, need to be carefully scrutinised to ensure that land uses are appropriate and the capacity of land within the Borough is maximised.
- One of the principal issues in the area is the delay in delivery of allocated housing sites. SNC would find it useful to see a proposed timetable, and copy of the Council’s ‘Housing Delivery Plan’, to ensure that any overriding constraints or other factors can be looked into and addressed by the appropriate bodies.
- Para 4.8 states, ‘whilst the Local Plan Part 2 has to seek to meet the housing requirement in Part 1 of the Local Plan, it does not have to identify every single site that will come forward over the plan period. It only has to identify those that are key to the delivery of its strategy. This consultation only considers sites that are considered able to accommodate five or more dwellings as it is not intended to allocate smaller sites’. 4.9 also states ‘even though not all sites have to be specifically identified’. Given the acute issues with delivery within the Northampton Area, SNC consider that, where possible all sites including smaller sites should be identified and allocated for housing within the Local Plan; in order to speed up delivery and ensure that there is a five year supply of sites.
- Para 4.10 states, ‘Table 2....shows how many houses are expected to be built on windfall sites. The capacity for new housing identified in the Land Availability Assessment on sites without planning permission is also included. This figure of 4,350 houses is comprised of the sites considered suitable for further investigation in Appendix A’. SNC is concerned regarding the evidence behind this windfall figure, and whether this is realistic based on past completions, over a time period that is equivalent to the plan period (not just 6 years). Suitable sites to meet the identified need should be allocated in the plan, rather than left to windfall, with a risk that these sites will come forward for non-residential uses.
- Para 4.11 states ‘Taking into account the number of houses completed, with planning permission, and allocated in the Local Plan Part 1, leaves a balance of 3,033 against the target of 18,870 houses in Part 1 of the Local Plan. However, it is important to note that not all sites with planning permission or allocated will be delivered before 2029. Further work will need to be done on the timing and rates of delivery, particularly on large sites, to establish the amount of houses that the Local Plan (Part 2) will need to plan for’. SNC would welcome further clarification of how this figure has been arrived out without the production of an action plan or other capacity assessment.

- Para 4.12 says *'taking this into account and the potential windfall allowance of 2,400 houses, there could be sufficient land available to meet the target of 18,870 in Part 1 of the Local Plan'*. SNC query whether this windfall allowance (2017 -2029) of 2,400 is realistic. This equates to 200 homes p.a. coming forward. Whilst there are fewer policy constraints within the urban area, this figure feels unreasonably high particularly if the school sites are excluded. It would also be usual for an appropriate lapse rate of at least 10% be applied.
- Para 4.13 states sufficient sites without planning permission have been identified in the Council's Land Availability Assessment to accommodate an estimated 4,350 dwellings. Whilst this is agreed, these sites will be subject to further assessment and there is no evidence to suggest all will come forward or are deliverable within the plan period.

Site Assessment Methodology:

SNC have observed a number of apparent inconsistencies in the way in which sites have been dismissed. For example:

- In terms of the sites which have been assessed, it is unclear where all of the evidence is as to why some sites have been 'dismissed'. For example there are a number of sites adjoining the urban edge of the town such as at Hunsbun - LAA0804 Teal Close and LAA0593 North of Bedford Road which have been dismissed without a detailed site assessment.
- We note that extensions to villages on the edge of Northampton for example near Little and Great Houghton have also been dismissed such as LAA0579- Bedford Road South and, LAA0788 Bedford Road North Great Houghton. Such sites could help to address any shortfall in housing.
- There appears to be large unmanaged areas of greenspace such as LAA0789- Bridge Meadow and LAA1028- Land at Nene Drive, Kings Heath, which have been dismissed without full explanation, or cross reference to any open space assessment.
- There are e inconsistencies, with some leisure and open space sites being included and others being dismissed, again it would be useful to see the evidence behind this, and how an assessment of the provision and quality of open space has been used.
- Other sites also seem to have been dismissed from further assessment without full justification such as -LAA1058 Land off Oat Hill Drive, Ecton Brook, -LAA0457 Woodland Walk, LAA0316 Car park chalk lane west, LAA0333- Castle Station (railfreight), LAA0626- Boston Clipper College Road and LAA0168 Rowtree Road, amongst others.

Northampton Borough Council Land Availability Assessment (September 2017)

- Para 1.1.3 states that *'It is not the role of the LAA to make definitive judgments on which sites should be allocated in the Northampton Local Plan Part 2. Instead, it identifies sites with potential for development to inform policy decisions about growth in the Borough'* (JCS). SNC agree with this statement. However, we would welcome greater acknowledgement that this is the evidence base which informs allocations in the Local Plan.
- Para 2.3.1 says *'The constraints considered in the assessment of the suitability of each site include allocations or designations such as:*
 - *Whether sites adjoin or relate well to the existing urban edge of Northampton'*.

Whilst it is accepted that the WNJCS generally directes development away from the rural areas to more sustainable locations in accordance with the settlement hierarchy. SNC consider that this assessment should be **policy off** e.g. sites within the Borough Boundary should be assessed and considered to appropriate expansion. These sites should only be dismissed if they are unsuitable at the point at which the Local Plan is making allocations.

- Para 2.4.2 states *'the residential densities across Northampton as set out within the West Northamptonshire Manual for Design Codes (WNDC, 2009) have been reviewed and, where residential density information is not available or considered reasonable, the Council has estimated residential densities on the following basis for the, purposes of the LAA:*
 - *Town Centre 150 dph*
 - *Rest of Borough 40 dph*

SNC supports higher densities within the urban area in order to improve sustainability and reduce pressure on less sustainable more rural parts of the county.

- Para 2.5.1 says *'Paragraph 48 of the NPPF advises that a windfall allowance may be justified in the five year supply if a local planning authority has compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. It adds that such an allowance should be realistic, having regard to the LAA, historic delivery rates and expected future trends... In accordance with this, the Council has assessed historic windfall delivery since 2011'*.

SNC note the WNJCS has a base date of 2011 (6 years) and that the emerging policy approach during the preparation of this document is likely to have had an impact on the delivery from windfall development. SNC request that the Borough base their assumptions on a longer time horizon to ensure that the figure is robust and pragmatic, taking into account recessionary years.

- Para 3.4.6 says *'If the site provides a leisure or community facility (including allotments), and it has not been demonstrated that the facility is no longer needed, can be relocated elsewhere, or that partial redevelopment is required to safeguard the facilities future, then the site is considered to be unsuitable'*. Para 3.4.7 goes on to state *'If the development of a site would result in the loss of Open Space (whole or partial) then the site is considered to be*

unsuitable, unless it can be demonstrated why the designation is no longer valid or how the loss of the Open Space could be overcome'.

SNC is of the view that, as part of this work an open space study looking at capacity and quality of open space should have been carried out, made publically available and used as part of the site assessment. As some areas may be providing a surplus of open space in line with requirements, or the quality of the space may be low. There may also be potential to develop part of the site. The whole site shouldn't necessarily be considered unsuitable just because part of the site is open space.

- Para 4.1.4 states that *'the Council is of the view that there is likely to be relatively little windfall (certainly that which can be supported by 'compelling evidence') in the first 5 years as, arguably, a proportion of such development will either already have planning permission, or be in the process towards a planning application. However, a significant and relevant supply from windfall development remains in the Borough after the immediate 5 year period. A windfall allowance will be used for the remainder of the plan period'.*

This argument appears to undermine the reliance on windfall (200 dpa) in the latter part of the plan period. SNC are unable to understand how this assumption can be evidenced. Furthermore, given the acute issues with the current 5 year land supply in the current plan period, SNC strongly urge the Borough to identify and allocate sites to provide comfort in respect of delivery rather than continuing to rely on a supply that is 'unknown'..

- Para 4.2.2 says that *'Evidence to support the Joint Core Strategy indicates that windfall sites of under 200 dwellings (excluding exceptional events such as the secondary school reorganisation process) have the capacity to generate up to 300 dwellings per year. It is anticipated that this trend will continue, certainly in the short to medium term due to Government's change to permitted development rights, the contents Northampton Land Availability Assessment 2017 22 of the NPPF (flexibility on employment allocations) and policies that will be included in Local Plan Part 2. For the period 1st April 2016 - 31st March 2017, windfalls added another 345 dwellings capacity over and above that which had been identified the year before'.*

However SNC is concerned that this is just a one year period. As with our other concerns regarding reliance on windfall development, we need to see evidence that this figure is deliverable on a yearly basis over the plan period. Furthermore, it should be noted that the figure set out within the JCS was based on a housing market area assessment (e.g. the NRDA), rather than specifically for Northampton Borough boundaries.

- Table 2 and para 4.4. Provides a summary of housing windfall over the past 6 years. Our concerns to this approach are set out in response to para 2.5.1.
- Para 4.6.1 states *'With a presumption in favour of sustainable development, there is no reason to believe it would not continue to form a notable part of the overall supply of new housing'.* SNC does not however consider that this is enough evidence to prove that housing would come forward at the same rate as over this small 6 year period, in future circumstance, over the future plan period.