

Lucy Staves

From: Fox, Ned [REDACTED]
Sent: 10 June 2016 12:11
To: Planning Policy
Subject: Northampton Local Plan Pt 2 Issues Consultation
Attachments: NBC LP Pt2 Reps Covering Letter - SCAN Letterhead.pdf; NBC LP Pt2 Reps FORM.pdf

Good Afternoon,

Please find attached the comments prepared on behalf of Persimmon Homes Midlands. I will drop a hard copy into the office later today. We look forward to engaging further as this plan progresses.

If you require further information then please let me know,

Regards,

Ned Fox
Planner

Persimmon Homes
3 Waterside Way
Bedford Road
Northampton
NN4 7XD

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[REDACTED]
www.persimmonhomes.com

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Planning Policy,
Regen, Enterprise & Planning Directorate,
Northampton Borough Council,
The Guildhall,
St Giles Square,
Northampton,
NN1 1DE

10th of June 2016

Dear Sir or Madam,

RE: Northampton Local Plan – Issues Consultation Paper

Persimmon Homes are one of the UK's leading house builders. We deliver over 13,000 units annually throughout the country. We pride ourselves on the efficiency of house provision and our proactive approach to working with all tiers of Government to drive positive change and address structural issues in the UK housing market. As the developers of the Dallington Grange SUE, the second largest by volume of housing, we are a key stakeholder in the future of the town. We look forward to collaborating with Northampton Local Planning Authority in the production of a positive development strategy for the Borough.

Housing supply –

We agree that getting the right approach on mix and affordability will ensure consistent delivery of the required number of units. The two overriding and interlinked factors that determine housing delivery are the timing of the infrastructure provision and the impact this has on viability. In this vein the LPA must recognise that an acceptable yield or margin differs depending on the developer. As such we would not wish to see the LPA make assumptions about yield, as suggested in the issues paper. We welcome the involvement of CBRE who are helping to provide clarity on, among other things, revenues and green field land values. However, consideration must be given to enabling developers to depart from the assumptions made by CBRE on development costs and revenues, where site specific issues need to be factored in.

We would welcome discussions with both NBC and NCC about the upfront delivery of infrastructure to ensure that much needed new dwellings can be built without impacting adversely on existing residents. This would help to unlock the provision of dwellings in the short to medium term. This is particularly pertinent since the adoption of the CIL Charging schedule, which reduces the clarity over the spending of planning obligations. The emerging local plan could help to clarify the JCS SUE Policies which require planning contributions to be made to highways. However as the Norbital road is on the CIL 123 list it will not be funded through 106 payments.

Defining the mix of dwellings is key to securing affordability for those seeking to buy new homes. As developers we must respond to the market demand for housing in terms of both our private and affordable units. We would be happy to work with the LPA on the preparation of policies about housing mix. Our experience is that the numbers of small families and first time buyers has increased demand for two and three bed homes. However we recognise that all people need to find homes appropriate to their needs and therefore we encourage a mix of house types throughout our schemes. The provision of a mix of housetypes on different



tenures is equally important in affordable units as market homes. The different requirements of people in need of housing means that a mix of appropriate tenures must be offered.

In terms of the proposals around the housing standards, we feel that these should be approached with due regard to viability. Setting thresholds for house sizes can adversely affect our ability to plan sites with an appropriate mix of family homes. Considering the advanced stage that the feasibility work is at for Dallington Grange we would urge the LPA to consider an adequate transition period for phasing in the space, energy and water standards. We would expect that the LPA's case would meet the requirement set out in the NPPG which requires them to consider need, viability and timing.

We note that NBC are unable to demonstrate a 5yr supply of available housing land. In light of this we would be open to discussing the quantum of residential development on the Dallington Grange scheme. Currently the proposed net developable area of the site delivers 36 dwellings per hectare (dph). If the site was plotted at 42dph it could deliver 475 more units. Subject to the capacity of the highways infrastructure, this uplift in numbers could start to be delivered within the first 5 yrs of the commencement on site. This would have a positive effect on the council's 5yr land supply position.

The plan will need to provide detail on the recent changes to primary planning legislation and policy guidance. The plan should be explicit about whether sites allocated in the plan will have Planning in Principle status. The LPA will also need to clarify the approach to the provision of Starter Homes in relation to the delivery of other tenures of affordable home. Aligned to the plan we would also wish to see the publication and adoption of the brown field register.

LAA Methodology –

We support the proposed methodology for the LAA. NBC would need to reinforce that the NPPG supports the vacant building credit and includes the 10 unit threshold for CIL payments. This will help to drive the delivery of smaller sites and could ensure that more sites come forward. The LPA will also need to consider how the sites on the LAA will be represented in other land registers, such as the Brownfield register. As a qualifying document the Brownfield Register will give PIP status to sites on the list. This should be factored in to the assessment to enable consideration of the likely delivery timescales. This would be dependant on the condition of the site and the level of remediation required.

We have provided details answers to the questions in the attached document.

Please let me know if you require any further details,

Yours faithfully,

Ned Fox
Planner
For Persimmon Homes Midlands





**NORTHAMPTON
BOROUGH COUNCIL**

Northampton Local Plan (Part 2) and Partial Review of the Central Area Action Plan

Comments Form and Guidance Notes

Issues Consultation Paper

SA Scoping Report

Draft Statement of Community Involvement

Northampton Borough Council

April 2016



Alive *Northampton*

Consultation Guidance Notes

- Northampton Local Plan (Part 2) Issues Consultation
- Sustainability Appraisal Scoping Report
- Draft Statement of Community Involvement

Northampton Borough Council is inviting your comments on the Northampton Local Plan (Part 2) Issues consultation and accompanying Partial Review of the Central Area Action Plan, the Sustainability Appraisal Scoping Report and a draft Statement of Community Involvement (SCI).

The Borough Council has published the Northampton Local Plan (Part 2) Issues consultation paper for consultation until Friday 10 June 2016. It is accompanied by a Sustainability Appraisal Scoping Report as part of the consultation. This is in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Northampton Local Plan (Part 2) will be the starting point for considering all planning applications within the Borough, alongside the policies in the West Northamptonshire Joint Core Strategy. The Local Plan (Part 2) will focus on providing local detail that is not already the subject of strategic policies.

It will identify land for new development for the provision of housing, jobs and other uses as well as areas for protection. The Local Plan will also include policies to help determine planning applications.

The Sustainability Appraisal Scoping Report sets out the scope of the Sustainability Report which will accompany the Northampton Local Plan (Part 2).

The Council is also consulting on the Draft Statement of Community Involvement, which sets out how the Council will involve the community in plan making and when considering planning applications.

The consultation period runs from 27 April to 10 June 2016.

Where can I view the consultation documents?

You can view the consultation documents in the following ways:

- On the Council's consultation portal at **<http://northampton.gov.uk/localplanissues>**
This system also allows you to submit comments.
- At The Guildhall One Stop Shop, Northampton Borough Council, St Giles Square, Northampton NN1 1DE.

- At all libraries in Northampton Borough.

If you do not have access to a computer, you can request paper copies by:

emailing planningpolicy@northampton.gov.uk

telephoning 01604 837326

or by writing to Northampton Local Plan (Part 2) Issues Consultation,

Planning Policy, Regeneration, Enterprise & Planning Directorate,

Northampton Borough Council, The Guildhall, St Giles Square,
Northampton NN1 1DE

If you would like copies of consultation documents in translated or other formats please refer to the Council's website at:

http://www.northampton.gov.uk/info/200041/equality_and_diversity/1309/interpreting

How can I comment?

You can comment on the consultation documents in one of the following ways:

Online: <http://northampton.gov.uk/localplanissues> OR

Complete the comments form which you can download from the website. By using the comments form, it helps us ensure we have all the correct information to register and process your comments and keep you informed. Once completed you can do the following:

Email: planningpolicy@northampton.gov.uk OR

Post: Northampton Local Plan (Part 2) Issues Consultation, Planning Policy, Regeneration, Enterprise & Planning Directorate, Northampton Borough Council, The Guildhall, St Giles Square, Northampton NN1 1DE (using the comments form available on the website)

All the above can be found by accessing the following link:

<http://northampton.gov.uk/localplanissues>

Responses should be submitted by 5pm on Friday 10 June 2016.

How will my comments be used?

The Council will consider your comments in progressing work on the Northampton Local Plan (Part 2). Comments received will be published on the Council's consultation portal in accordance with the Data Protection Act.

Responses will be reported to the Council's Cabinet Advisory Group, which advises on the preparation of the Northampton Local Plan (Part 2). They will also be reported in summary to the Council's Cabinet.

If you are organising a petition or intend to, or have signed one, it must be submitted by the deadline and be accompanied by the name and contact details of the petition organiser. The Council will only register the petition organiser on its Local Plan consultation database and future notifications will only be sent to the petition organiser. The number of signatories to the petition will be recorded.

Following the consultation, a feedback report will be produced setting out the main issues raised by the consultation documents. Responses will be used to inform preparation of the next versions of the documents. These will be:

- Northampton Local Plan (Part 2) Options consultation
- Sustainability Appraisal Report for Options Local Plan
- Final Statement of Community Involvement

Fair Processing Notice issued under The Data Protection Act 1998

All observations, objections and supporting comments submitted to Northampton Borough Council are public documents. Therefore the information you submit in response to consultations on the Local Plan **will be** publicly available as part of the consultation responses and made available for any member of the public to view in person. This may include your name and the comment made. Specific personal contact data such as your email address, signature, postal address and telephone number **will not** be published on the Northampton Borough Council website but retained for contact purposes only by the planning department at Northampton Borough Council.

In submitting a comment on the Local Plan you agree for your information to be held and processed for the purpose(s) and in the way detailed above.

If you have any questions, please contact us by email at: planningpolicy@northampton.gov.uk or by telephone: 01604 837326.

Your Contact Details		
	Your Details	Agents Details (if applicable)
Name	NED FOX	
Organisation	PERSIMMON HOMES	
Position	PLANNER	
Email	[REDACTED]	
Telephone	[REDACTED]	
Address	3 WATERSIDE WAY BEDFORD RD	
Town	NORTHAMPTON	
Postcode	NN4 7XD	
Your Role	Are you the Landowner, Land Agent, Developer, Housing Association, Planning Consultant, Other?	
	Developer.	

Northampton Local Plan (Part 2) and Partial Review of the Central Area Action Plan

Issues Paper

Northampton Local Plan (Part 2)

Question 1 – What are the main issues relating to housing delivery, mix and affordability which the Local Plan (Part 2) should consider? The Local Plan (Part 2) will not be reviewing the number of new homes that is already identified in the adopted Joint Core Strategy.

AS EXPLAINED IN OUR COVERING LETTER WE FEEL THAT VIABILITY AND INFRASTRUCTURE PROVISION ARE CRITICAL FACTORS THAT THE PLAN NEEDS TO CONSIDER. NBC MUST PROACTIVELY ENGAGE WITH THE DEVELOPMENT SECTOR TO ENSURE THE ALLOCATED SITES ARE VIABLE AND DELIVERABLE.

Question 2 – Do you think that we need sites that can deliver new homes more quickly, in the short to medium term?

Yes. CONSIDERING NBC'S 5 YEAR LAND SUPPLY POSITION IT IS IMPERATIVE THAT THE LPA GIVE FIRM COMMITMENT TO DELIVERABLE SITES. IF THIS IS NOT ADDRESSED SOON THE LPA WILL HAVE A HUGE SHORTFALL BY THE TIME THE PLAN IS ADOPTED IN SPRING 2018.

Question 3 - Do you think that we need a mix of market housing eg. family homes, housing for single households?

YES →. A BROAD MIX OF HOMES IS ESSENTIAL TO MEET THE NEEDS OF A DIVERSE HOUSING MARKET.

Question 4 - Do you think that we need a mix of affordable housing eg. affordable rent, social rent, shared ownership, Starter Homes?

YES - THE PROVISION OF AFFORDABLE HOMES IS COMPLEX AND CANNOT BE APPROACHED WITH A ONE-SIZE-FITS-ALL SOLUTION. THE PLAN WILL NEED TO PROVIDE DETAIL ON HOW THE LPA WILL PROMOTE THE SUPPLY OF STARTER HOMES IN LINE WITH THEIR OBLIGATIONS UNDER THE 2016 HOUSING AND PLANNING ACT.

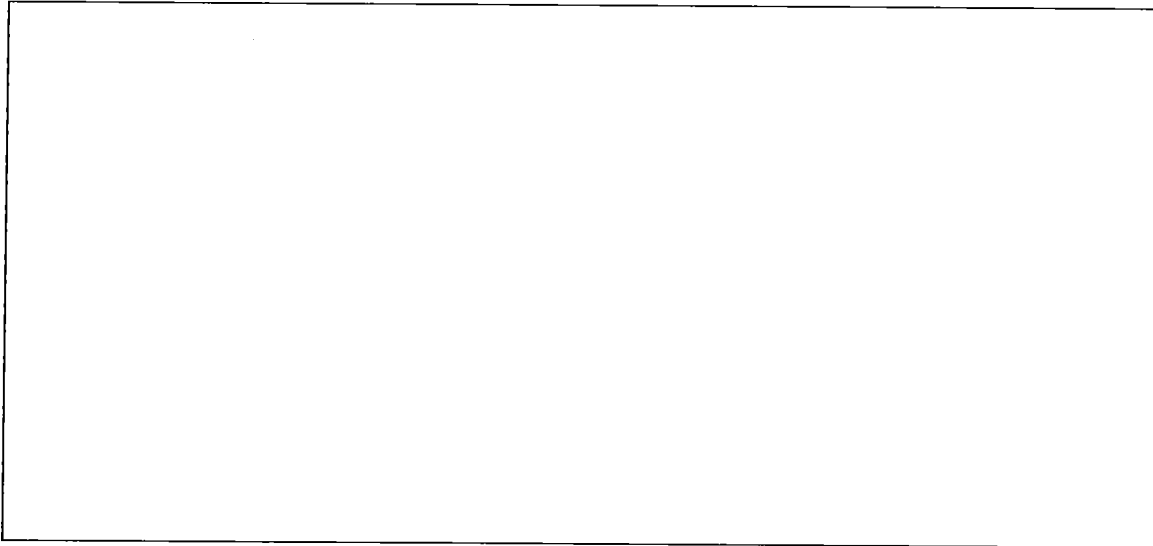
Question 5 – Is there evidence to support the Local Plan (Part 2) introducing the optional national housing technical standards in relation to access and space standards?

THIS WOULD NEED TO BE FULLY TESTED IN LINE WITH THE REQUIREMENTS OF THE NPPG.

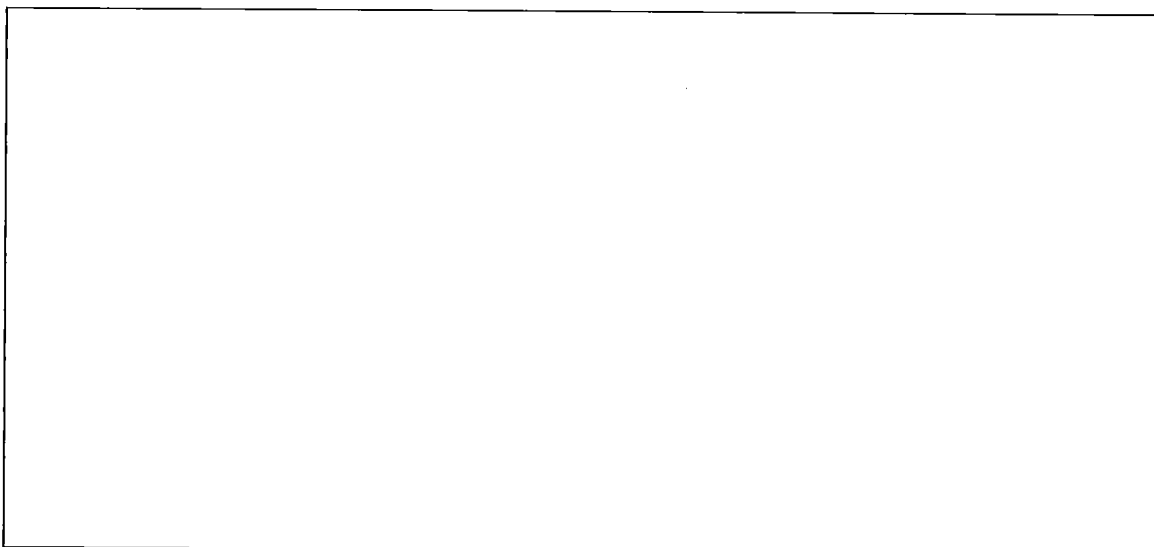
Question 6 – Is there evidence to support the Local Plan (Part 2) introducing the optional national housing technical standards in relation to water efficiency standards?

SEE QUESTION 5.

Question 7 – Are there particular sites that are not used currently for employment uses which you consider would be particularly suitable for new employment uses? The Local Plan (Part 2) will not be reviewing the jobs growth which is already set out in the adopted Joint Core Strategy.



Question 8 – Outside of the Enterprise Zone, are there any other existing employment areas where opportunities could be improved and vacancy rates could be addressed? If so, how could this be achieved?



Question 9 – Do you think there are any areas within the Borough where certain types of employment development are generally acceptable but which currently require planning permission, which could reasonably be dispensed with through the introduction of a Local Development Order?

Question 10 – Please provide details of any particular infrastructure issues in relation to new development which you think the Local Plan (Part 2) should address, if possible providing evidence?

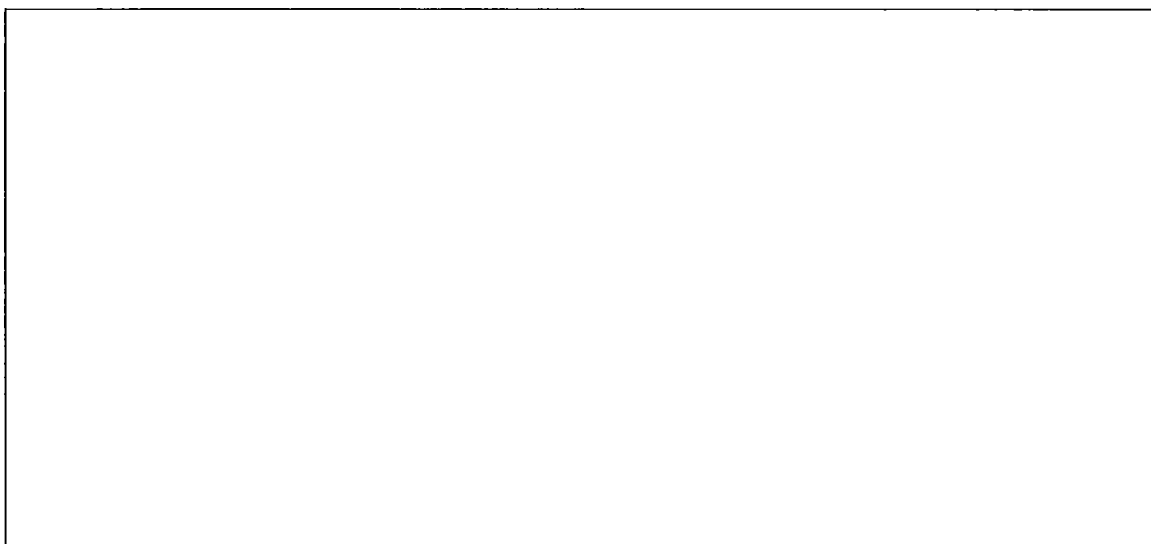
THE NORTHERN ORBITAL ROUTE →.

THE PLAN MUST MAKE CLEAR HOW THIS ROAD WILL BE FUNDED UNDER THE CIL REGIME. THE EXISTING POLICIES IN THE WNSCS 2014 REQUIRE PLANNING CONTRIBUTIONS TO BE MADE TO FUND THE ROAD. THERE IS CURRENTLY NO FORMAL MECHANISM FOR NBC TO TRANSFER CIL FUNDS TO NCC TO ENABLE THEM TO DELIVER THE ROAD.

Question 11 – How do we ensure a successful town centre in light of changes to shopping habits such as increased use of out of town retail and on-line shopping? The Local Plan (Part 2) will not be reviewing the retail growth which is set out in the adopted Joint Core Strategy.

- CREATE MORE HOMES IN THE TOWN CENTRE. THIS WILL STIMULATE ECONOMIC ACTIVITY.
- TAKE A FLEXIBLE APPROACH TO GROUND FLOOR USES. TO BE SUCCESSFUL TOWN CENTRES MUST BE ABLE TO ADAPT TO THE NEEDS OF THE MARKET.

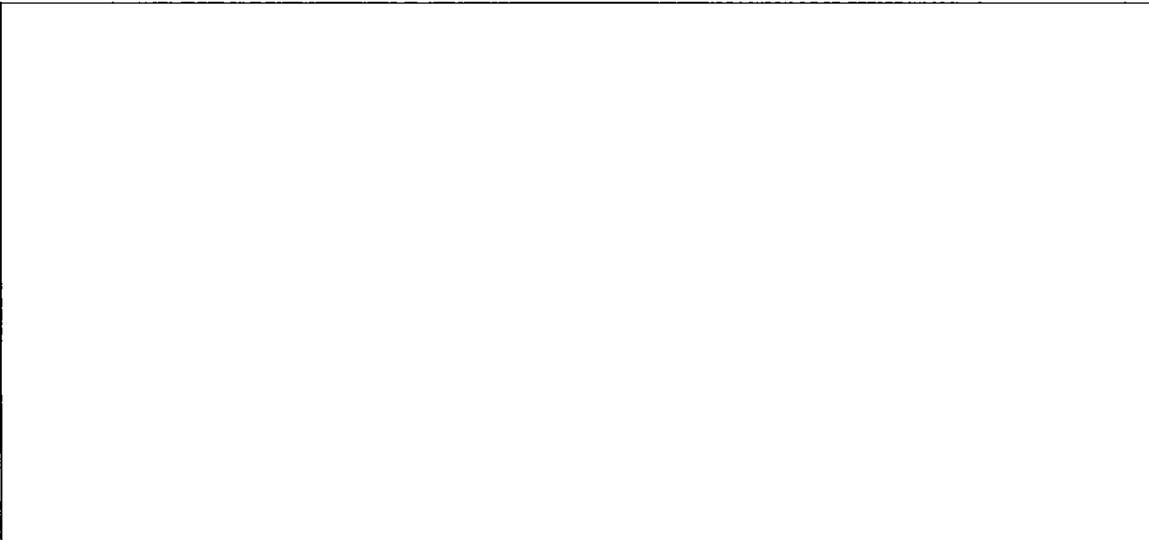
Question 12 - Are there areas where the location of betting shops and hot food takeaways should be restricted?



Question 13 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to protect and enhance areas of biodiversity in addition to the policies in the NPPF and Joint Core Strategy?



Question 14 - Do you think there are priority areas where green infrastructure networks could be enhanced or extended?



Question 15 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to protect and enhance heritage in addition to the policies on the historic environment in the NPPF and the Joint Core Strategy?

THE PLAN SHOULD BE SUPPORTED BY A TOWNSCAPE ASSESSMENT THAT OFFERS GUIDANCE ON LOCAL CONTEXT. THIS SHOULD NOT BE USED TO STIFLE INNOVATION AND SHOULD SUPPORT AN INNOVATIVE AND PROACTIVE APPROACH TO THE USE OF SCALE, MASSING, PROPORTION, COLOUR, MATERIAL AND LAYOUT.

Question 16 - Should the Council review the list of locally listed assets of historical importance?

YES. THIS IS INTEGRAL TO ANY MEANINGFUL TOWNSCAPE ASSESSMENT.

Question 17 - Do you think there are locally important landscapes which should be identified in the Local Plan (Part 2)?

Question 18 – How do we ensure that new development preserves and enhances the character and appearance of the Borough and makes a positive contribution?

SEE QUESTION 15.

THERE ARE CERTAIN AREAS, SUCH AS THE PERIPHERAL SUE'S, WHERE THERE IS NO DEFINED CONTEXT FOR THE SITE. IN THIS INSTANCE DEVELOPERS SHOULD HAVE MORE OF A FREE HAND OVER DESIGN. AN OVERLY PRESCRIPTIVE AND RIGID APPROACH TO DESIGN WILL NOT ADDRESS THE HOUSING SHORTFALL.

Question 19 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to promote measures within new development to address climate change and renewable energy in addition to the policies in the Joint Core Strategy?

Question 20 – Should we review and incorporate existing Interim Planning Policy Guidance (eg. Affordable Housing, Houses in Multiple Occupation, etc) into the Local Plan (Part 2)?

YES. GIVEN THE RECENT CHANGES TO PRIMARY PLANNING LEGISLATION AND POLICY GUIDANCE AN UPDATE IS REQUIRED.

Question 21 - Are there any other issues that the Local Plan (Part 2) needs to consider?

NOT AT THIS STAGE.

Question 24 - Safeguarded Public Transport Route (Policy 8) – is the proposal for a public transport / cycling / walking route still appropriate and up-to-date?

THIS STILL CONSTITUTES AN ESSENTIAL PIECE OF INFRASTRUCTURE FOR THE TOWN. AS SUCH, THE POLICY SHOULD BE UPDATED TO ENSURE DELIVERY.

Question 25 - Pedestrian and Cycling Movement Network (Policy 9) – should this policy be updated to link to the County Council's Smart Corridors initiative? Are the identified routes into and across the town centre still up-to-date?

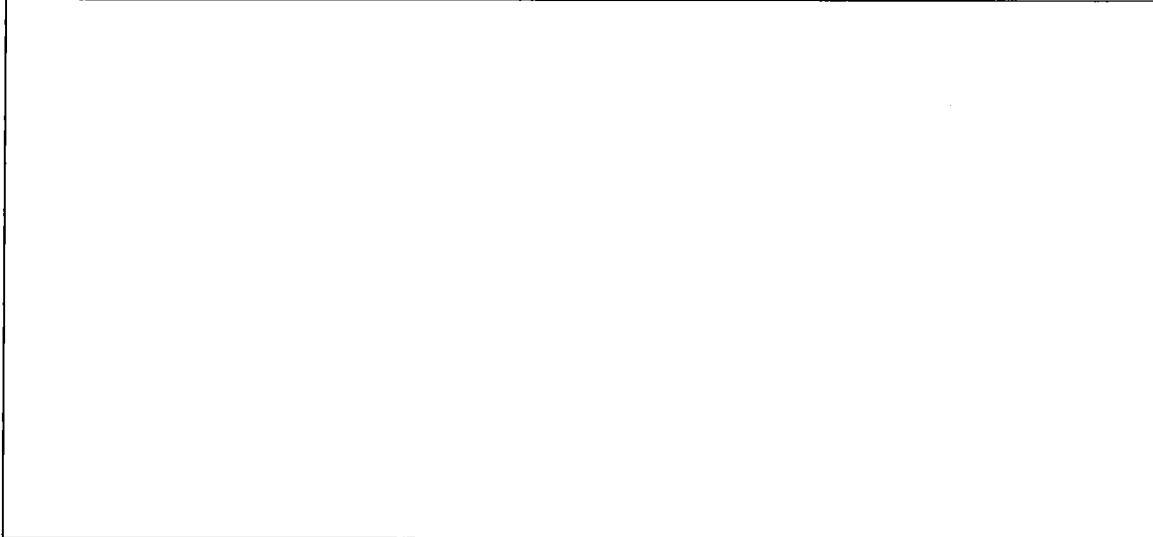
Central Area Action Plan

Question 22 - Flood Risk and Drainage (Policy 5) - is this policy still appropriate and up to date in relation to the Drainage Plan Part 1?

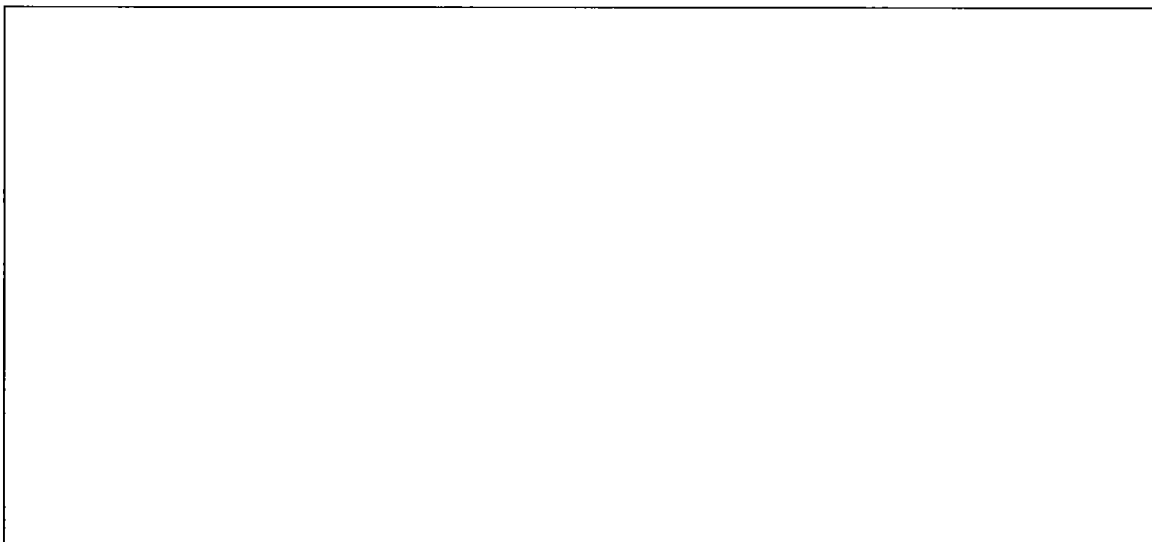
NATIONAL FLOOD POLICY CHANGED IN 2015, AS SUCH THIS POLICY SHOULD BE UPDATED ACCORDINGLY

Question 23 - Inner Ring Road (Policy 6) - is the proposal for the Inner Ring Road still appropriate and up-to-date?

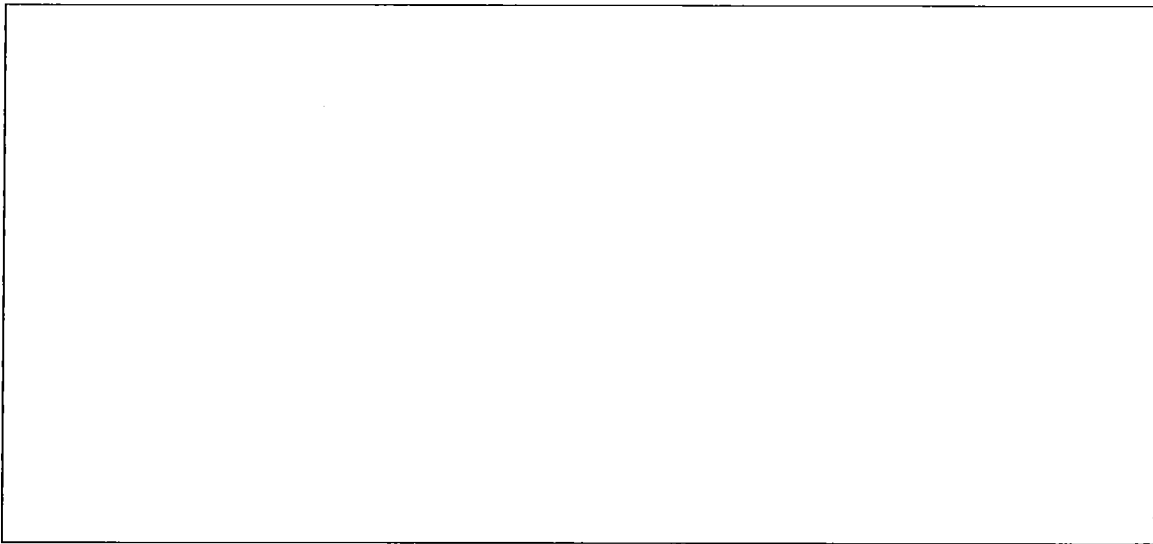
Question 26 - Parking (Policy 10) – should the Council identify more car parks within the town centre and if so, where should they be?



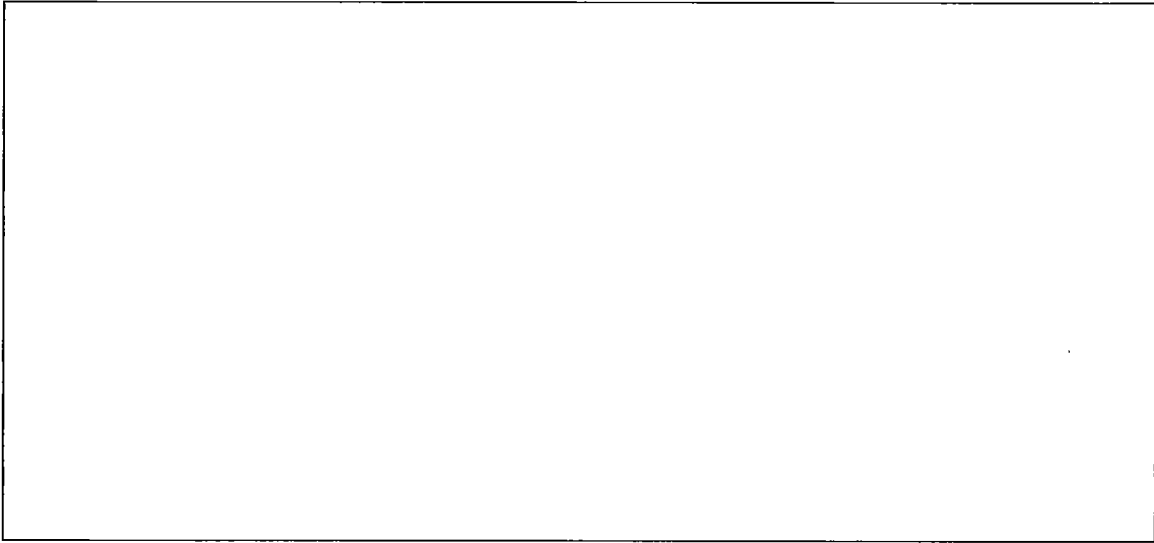
Question 27 - Improving the Retail Offer (Policy 13) – this policy needs to be updated due to changes in Government policy such as the extension of permitted development rights. Do secondary frontages still need to be identified?



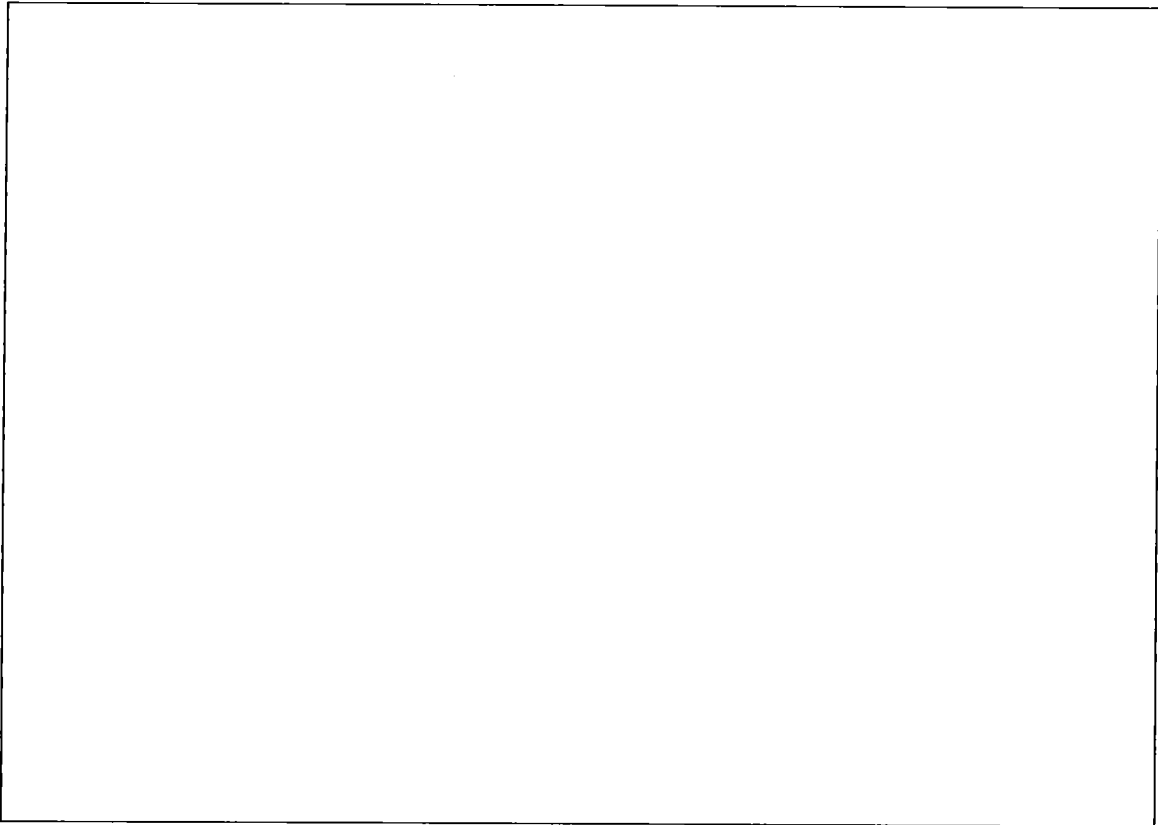
Question 28 - Meeting Retail Capacity (Policy 14) – do we need a more up-to-date retail capacity study to ensure that this policy is up-to-date?



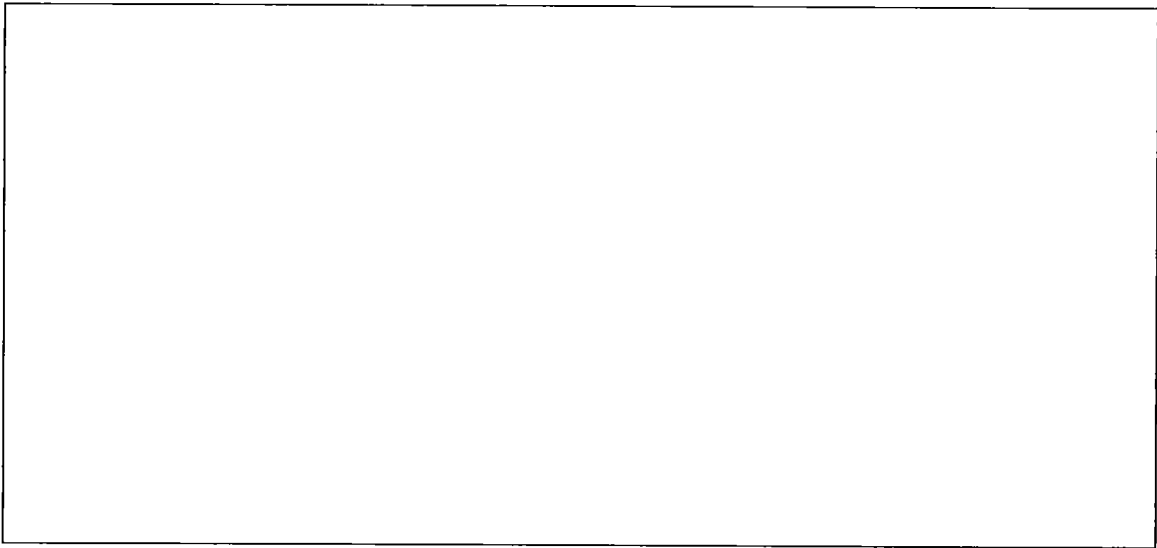
Question 29 - Office and Business Uses (Policy 15) – this policy needs to be revised due to changes in Government policy. Should we identify land for new offices within the town centre? How should the Council seek to safeguard existing office space, especially in light of recent and proposed Government changes regarding permitted development rights?



Question 30 – Do any of the site specific policies need updating? Please indicate which policies and provide details if possible (Policies 18-35).



Question 31 - Please provide details of any other policies in the Central Area Action Plan which you consider the Council should reassess to ensure that they are up-to-date, if possible providing evidence.



**Northampton Local Plan (Part 2)
Consultation On The Sustainability Appraisal Scoping Report**

When preparing a Local Plan, the Council is legally required to undertake an environmental appraisal of its proposed plans and policies, as well as a Strategic Environmental Assessment (SEA). There is a requirement to consider the social, economic and environmental impacts of these policies.

Question 32 - Do you have any comments on the Sustainability Appraisal Scoping Report?

Please identify the page, paragraph number(s), table or appendix within the Scoping Report to which each of your comments applies.

**Northampton Local Plan (Part 2)
Consultation On The Draft Statement Of Community Involvement**

The Statement of Community Involvement sets out how the local community, businesses and other organisations with an interest in development in Northampton can get involved. It provides a framework for involving and informing community engagement in plan making as well as in determining planning applications.

Question 33 - Do you have any comments on the Draft Statement of Community Involvement?

