

**From:** Blumire, Ross <[REDACTED]>  
**Sent:** 10 June 2016 11:27  
**To:** Planning Policy  
**Subject:** Local Plan Part 2 Issues Consultation  
**Attachments:** DWH Local Plan 2 Consultation Reps 10.06.16.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs,

Please find attached David Wilson Homes (South Midlands) representations to the Local Plan 2 consultation.

I would be grateful if you could confirm receipt of our submission and that you can open the attachments.

Yours faithfully



**Ross Blumire MRTPI**

Strategic Planner

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Northampton Local Plan (Part 2) Issues Consultation  
Planning Policy  
Regeneration, Enterprise & Planning Directorate  
Northampton Borough Council  
The Guildhall  
St Giles Square  
Northampton  
NN1 1DE

10<sup>th</sup> June 2016

Dear Sirs,

**Re: Northampton Local Plan Part 2: Issues Consultation**

Please accept this letter as David Wilson Homes (South Midlands) consultation responses to the above consultation document.

*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.*

The housing numbers in the Joint Core Strategy should be seen as a minimum requirement, not an absolute requirement. This is particularly prevalent given the newly released ONS 2014 based Sub National Population Projections, identifying increased population expectations and a subsequent increase in housing needs.

Given the recent Appeal decision (Ref: APP/V2825/A/14/2228866) regarding land at Hardingstone, Northampton it is considered important the Council considers, along with neighboring authorities, how the Northampton Related Development Area (NRDA) housing need will be met. The Appeal decision confirmed an overall shortfall in provision of 2,929 dwellings up to 2013/14 in the NRDA. There is little scope within the existing NRDA boundary to meet this shortfall.

Our site at land south of Wooldale Road, east of Wootton Road, Wootton, Northampton within South Northamptonshire local authority area would make a suitable reserve site to help meet this shortfall. The site is immediately adjacent to the existing built up boundary of Northampton and would make a sustainable well integrated extension to the settlement.

The continued shortfall in supply and lack of a Five Year Housing Land Supply in the NRDA will have a significant impact on affordability due to a lack of supply. Reserve sites could be an important tool for Northampton Borough to demonstrate a Five Year Housing Land Supply and promote the most sustainable sites.

The delivery of appropriate infrastructure and associated cost will also be an important consideration in the deliverability and viability of housing proposals and allocations in Northampton.

The emerging Central Government guidance relating to affordable housing including Starter Homes and housing delivery such as Brownfield Registers and Self Build Registers must be considered within the Local Plan (Part 2) preparation. The incorporation of Starter Homes will be particularly important in the preparation of the affordable housing policies. The restriction on planning obligations and no affordable housing on sites with less than 10 dwellings as set out in the Planning Practice Guidance, will be important in allocating enough sites to meet affordable housing needs and in allocating sites of an appropriate scale.



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

Additional sites need to be provided in the short to medium term to meet the shortfall in the Northampton Related Development Area. Suitable sites such as the site to the south of Wooldale Road, east of Wootton Road, Wootton in South Northamptonshire could help meet this need.

Sites need to be allocated for release across the Plan period to ensure a continued supply of housing. The housing numbers in the Joint Core Strategy should be seen as a minimum requirement, not an absolute requirement. This is particularly prevalent given the newly released ONS 2014 based Sub-National Population Projections, identifying increased population expectations and associated increased housing need.

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

Yes, a mix of housing is important to meet the needs of all members of society. A prescriptive mix should be avoided with developers trusted to provide an appropriate mix. Developers will provide a mix that their customers require meeting an identified need, as all customers do not require the same home. A site mix should be justified by the surrounding services and facilities and constraints of the site with the most appropriate housing provided.

A site by site negotiation should be undertaken for affordable housing with the most appropriate mix applied to each site subject to viability and constraints.

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

Yes, a mix of affordable housing tenures will be required, in line with Central Government Policy. There is a clear move from Central Government towards home ownership as opposed to rental properties. The requirements of Affordable Housing Providers should be the biggest consideration in preparing an appropriate mix for a site, as they are the specialist operators. A prescriptive mix policy should be avoided with appropriate mixes negotiated on a site by site basis subject to viability and constraints.

*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?*

Local Plan (Part 2) policies should avoid repeating or doubling up on any policies in the NPPF and Joint Core Strategy or statutory designations or existing protections such as Protected Species Regulations.

*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?*

Local Plan (Part 2) policies should avoid repeating or doubling up on any policies in the NPPF and Joint Core Strategy or statutory designations or existing protections such as Listed Building Regulations.

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

Yes, the locally listed assets of historical importance should be reviewed to ensure their status is still relevant and local development or changes have not diminished their qualities warranting removal from the list.

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

No, each application should be judged on its merits and where appropriate include a landscape appraisal. Local Plan policies are often not suitable for considering the intricacies of individual sites amongst a wider landscape area.

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

Prescriptive policies should be avoided in preserving and enhancing the character and appearance of the Borough. A general policy requiring this to be considered should be applied with the emphasis on the developer to demonstrate integration with justification for design proposals. It is important to allow developers flexibility to meet design requirements to ensure viability and avoid uniform developments and personal preferences in design and appearance.

*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?*

No, climate change and renewable energy requirements should be left to Building Regulations as set out by Central Government. Additional requirements will affect scheme viability, which will have a knock on effect on affordable housing provision and planning obligations. Additional policy requirements will also affect developers ability to be flexible in approaches to meeting changing building performance requirements such as fabric first approaches.

*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)?*

Local Plan (Part 2) should include all relevant planning policies for the Plan period in a single document, which is approved by an Independent Inspector. If this requires the review and incorporation of existing policies or all new policies, such considerations should be undertaken.

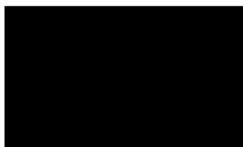
*Question 21 – Are there any other issues that the Local Plan (Part 2) needs to consider?*

The potential interaction and impact of surrounding local authorities and new developments such as Rushden Lakes and Blisworth Strategic Rail Freight Interchange should be considered.

I trust all of representations are self-explanatory however should you have any questions please do not hesitate to contact me on the details below.

Please confirm receipt of these representations and I would be grateful if I could be informed of any further consultations regarding this and any other planning policy documents.

Yours sincerely,



**Ross Blumire**  
**Strategic Planner**  
**David Wilson Homes (South Midlands)**  
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