

From: [REDACTED]
Subject: NBC Local Plan (Part 2) Options Consultation Paper
Date: 02 November 2016 14:49:27
Attachments: [image001.png](#)
[CCH NBC Options Reqs.pdf](#)

Dear Sirs,

I write in regards to the recently published Northampton Borough Council Part 2 Local Plan Options Consultation Paper.

The following attachment is submitted by CC Town Planning on behalf of our client Clayson Country Homes Ltd.

Should you wish to discuss the attached or any of those points raised therein then please do not hesitate to contact me via any of the usual channels.

Kind regards

Ross

Ross Middleton BA (Hons) MA MRTPI
Principal Planning Consultant

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Date: 1st November 2016



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Local Plan (Part 2) Options Consultation
Planning Policy
Northampton Borough Council
The Guildhall
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Dear Sirs,

RE: Northampton Borough Council Local Plan (Part 2) Options Consultation Paper.

CC Town Planning have been appointed by Clayson Country Homes ('the client') to provide town planning consultancy services in respect of their land and property holdings within Northampton Borough.

The following correspondence is submitted in response to Northampton Borough Council's ('NBC') ongoing consultation in respect of the progress to adopt their Part 2 Local Plan ('LP2') for the Borough. The enclosed seeks to respond to those relevant questions contained within the recently published Options Consultation Paper and should be read in the context of those sites which were submitted, on behalf of the client, to the recent 'Call for Sites' held by the Borough. For the purposes of clarity these sites are;

- Land at St. Peters Way/Court Road/Freeschool Street (LPA Ref LAA1010)
- Great Houghton Former School Site (LPA Ref: LAA1024)
- Land at Towcester Road (LPA Ref: LAA1025)

As an established housebuilder of over 40 years our client has operated within Northamptonshire through both the strongest periods of growth and the most challenging of economic periods. The client has now had chance to consider the Options Consultation Paper and the following comments have been structured to respond to those relevant questions set out within the document.

At the outset our client commends the Borough Council's efforts up to this point and recognises the significant work which has taken place to produce the consultation document.

It is clear that in order to develop Northampton's national role through attracting investment and visitors to the area, will require the Council to set out a pragmatic and achievable plan which can realistically achieve consistent growth which meets the needs of the current population and those who wish to live and work in the Borough, as well as those who will visit the town.

The clients' interests relate primarily to the achievement of sustainable residential development and therefore only those pertinent questions posed within the consultation document have been considered. These questions and the client's responses are set out in turn below;

Question 3: Do you agree that we should apply a 20% housing land buffer to our housing land supply?

It is clear that there has been a persistent under-delivery of housing within the Borough against strategic targets in recent years and therefore the appropriate 20% buffer, using the 'Sedgefield' method, should be applied when determining the Council's 5-year housing land supply position in line with Para 47 of the NPPF.

There does however remain some confusion over the inclusion of this question within the Issues Consultation Document, particularly when an inspector has confirmed within a recent appeal decision (APP/V2825/A/2228866) that the Council should be applying this appropriate buffer.

It is accepted that Northampton needs to deliver 18,870 dwellings during the period 2011-2029 and given the persistent under delivery in housing completions the Council need to adopt a strategy which seeks to maximise residential development. Whilst it is confirmed that the Council need to apply a buffer when calculating their 5-year housing land supply position, thought also needs to be afforded to the overall housing figure for the Borough.

It is the client's opinion that the 18,870 should be a minimum target and should not be a cap on development, furthermore it is considered that the emerging Local Plan Part 2 should provide a strategy for delivering housing beyond 2029. The current target is to adopt the Part 2 plan in 2018, whilst this could be considered ambitious it is achievable, however if this is the case there will only be 11 years of the plan period left. Therefore, the Part 2 Plan should consider a period beyond 2029 and contain a strategy to meet a revised housing target which is based on robust evidence contained in an up to date objective assessment of need through a revised Strategic Housing Market Assessment.

Question 4: Do you agree with a residential density of 40 dwellings per hectare outside of the sustainable urban extensions, with higher densities in the town centre, other centres and along key transport corridors?

Whilst the client accepts that there are many benefits associated with residential developments which are of a higher density, there are numerous adverse effects associated with the imposition of an over prescriptive planning policy of this nature.

An element of the client's land holding within the Borough, namely St. Peters Way/Court Road/Freeschool, lies in an accessible location in the town centre and in proximity to both shops and services, a range of other amenities and public transport links. Such centrally located sites can accommodate high density residential schemes. Therefore, in such circumstances a policy of this nature could potentially be welcomed.

However, in those other locations outside of the central area a more pragmatic and flexible approach is required to inform housing density. The imposition of a plan wide density policy has the potential to negatively affect the quality of future developments and furthermore will result in the disproportionate delivery of smaller sized dwellings which may not meet local housing needs.

In addition to the above, it is also questioned whether the stated density requirement can actually be achieved when the combined requirements of the Technical Housing Standards (CLG, 2015) and the recently adopted Northamptonshire Parking Standards are accounted for. Such publications increase the development pressure on sites and serve to counteract the policy objectives of housing density policies such as that proposed.

In direct regard to the recently adopted Northamptonshire Parking Standards document, it is considered that the County Council's parking requirements have increased significantly and the immediate consequence of this is that the Council will have to find additional land for housing due to the increased land requirements for parking.

It is accepted that maximising the number of dwellings on additional sites outside of the SUE's would go some distance in addressing the land supply issue which is currently faced by NBC. However, it is urged that the Council seek to identify further sites for residential development to ensure that all new development is sustainably delivered to both meet current needs and be adaptable to changing personal circumstances in the future.

In conclusion it is therefore considered that a prescriptive housing density policy, such as that proposed would serve to overburden developers, add yet another barrier to housing growth and ultimately result in over developed sites. For this reason, it is urged that Officer's reconsider those policy provisions contained within the NPPF, particularly at Para 47 and 59, which guides local authorities to avoid unnecessary prescription and consider development proposals against the context of neighbouring buildings and the local area more generally.

Question 5: In allocating sites for housing development, do you agree that we should give priority to sites that can be delivered in the short term?

The client awaits the outcome of the Council's assessment of those sites which have been submitted to the recent 'Call for Sites' invitation. At the outset, in the context of the current housing land supply issue, the Council should give priority to those sites which can be delivered in the short term.

Our client's land holding extends to three sites which are suitable for a range of housing options which would meet the needs of first time buyers right through to those which are seeking more aspirational and executive style properties within the Borough.

Whilst it is accepted that it is the Local Authority's intention to maximise housing delivery within the Borough, this should not be at the cost of providing the range of properties required by the market.

It is acknowledged that the SUE's identified within the West Northants Joint Core Strategy (Part 1) will play a key role in the future development of

Northampton Borough. However, there are concerns over the ability of a small number of larger sites to meet the immediate needs present within the Borough, this is evidenced by the current 5 year housing land supply position within the Borough and Northampton Related Development Area. It has been demonstrated previously that the client has three immediately available sites which are suitable for development and can be viably delivered in the short/medium term. These sites would serve as a healthy compliment to the SUE's and ease the pressure on those larger sites to ensure that housing continues to be delivered within the Borough before strategic developments come on stream.

It is therefore considered that it is vital that the Part 2 Local Plan allocates and supports the development of those sites which can be delivered in the short term.

Question 7: Do you agree that we should identify sites for specialist housing? & Question 8: Do you agree that we should identify sites specifically for the provision of older persons housing?

The client is in complete agreement that the Part 2 plan should identify land to meet those housing needs which exist within the Borough.

Whilst positively prepared policies in respect of specialist housing and the provision of housing for older people will go some distance in addressing those needs it is considered that such development could be assimilated into all proposed residential sites. However, as is the case with affordable housing, we are aware of the management issues that arise from a 'pepper pot' approach to such development.

In the majority of cases, specialist needs are better met through those sites which are more centrally located or on those sites which offer residents high accessibility to shops, services, facilities and public transport. It is considered that as a consequence of allocating currently suitable residential sites to meet particular housing needs, the Council will have to identify further land to meet more general housing needs.

In addition to this it is urged that the Local Plan does not lose sight of changing personal circumstances and needs over time. In reference to any proposed density policy, whilst higher densities will assist in addressing the current housing land supply issue in the Borough, the resultant reduced plot sizes and decreased average house size will potentially render dwellings unadaptable to changing future personal requirements.

Given the above it is urged that any proposed housing policies, for specialist properties or otherwise, allow for the delivery of suitably flexible developments which are both sustainable and responsive to changing circumstances and individual needs over the life of the plan.

Question 9: Should allocations for general housing include a proportion of smaller market dwellings (1 and 2 bed)?

It is considered that residential development should be brought forward in line with the most up to date available evidence of housing need for the entire housing market. The imposition of a policy which prescribes a proportion of smaller properties on all new residential development sites has the potential to be counterproductive.

Northampton has seen a significant number of 1 and 2 bed dwellings both permitted and completed in recent years, this has been bolstered yet further by those changes to the Permitted Development Regulations in 2014 and yet again in April 2016. These regulatory changes have resulted in the loss of large swathes of town centre office floor space through residential conversions. In the majority of cases these developments have been for flats/apartments which would have met a significant amount of local demand and subsequently reduced the pressure on allocated sites to deliver smaller properties.

Whilst smaller properties will have a role to play in ensuring the sustainability of future residential developments, it is urged that any policy carefully considers and accounts for the level of need for such dwellings to make sure that there is not an over-supply of 1 and 2 bed properties.

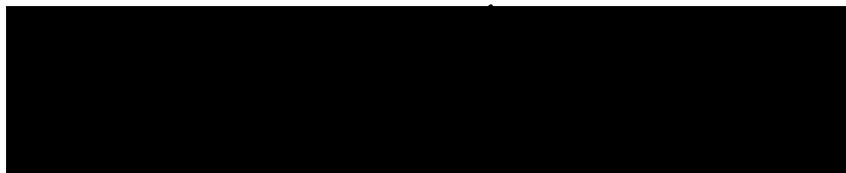
Conversely, the Council also needs to consider the whole range of housing needs present within the Borough including those executive and aspirational needs which sit at the other end of the spectrum.

Therefore, it is considered that the Part 2 Plan would benefit from reference which states that the appropriate housing mix for new residential proposals should be informed by the most up to date evidence on housing need, which should be periodically updated over the life of the plan.

As stated in previous submissions to Northampton Borough Council, our client's sites present immediately available opportunities to deliver much needed residential development to assist in alleviating the acute housing land supply issues the Borough currently faces. Should you wish to discuss any of those sites listed above or any of the commentary contained within this correspondence then please do not hesitate to contact me.

Additionally, if you could confirm receipt of this letter by return it would be greatly appreciated.

I look forward to hearing from you.



Principal Planning Consultant