

From: [REDACTED]
Subject: EMS.2615 Local Plan Part 2 Consultation
Date: 02 November 2016 15:35:13
Attachments: [02.4261.Northampton Borough.Options Response.02.11.16.pdf](#)

Dear Sir/Madam

Please find attached a copy of response on behalf of Miller Homes in relation to the above consultation.

A hard copy of the submission is also in the post.

Guy Longley

Executive Director

Pegasus Group

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GLO/02.glo.4261/EMS.2615

02 November 2016

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

Dear Sir/Madam

Northampton Local Plan (Part 2) Options Consultation

Thank you for the opportunity to comment on the Northampton Local Plan (Part 2) Options Consultation. The following submission is made on behalf of Miller Homes who have interests in land to the east of Northampton falling within Wellingborough Borough Council's area.

The Options Consultation Paper sets out the purpose of the new Northampton Local Plan to address the supply of sites within Northampton to deliver new homes, maintain and expand employment opportunities, enhance the Town Centre, protect the historic and natural environment and provide detailed development management policies.

In terms of housing provision, the Options Paper refers to the requirement set out in the West Northamptonshire Joint Core Strategy to provide 18,870 dwellings within Northampton by 2029. The paper sets out the strategy to deliver new housing by providing for as much of the Borough's growing population as possible with a focus on brownfield sites and a minimum density of 40 dwellings per hectare with higher densities near to the town centre, other key centres and along key transport corridors. There is also reference to the potential for development on some existing employment sites and open space (pages 8-9). The Option Paper notes, however, that the urban area has limits on the amount of available space and as a result there is likely to be a shortfall of land to accommodate dwellings in order to meet identified future needs (page 9). The paper confirms that the Council is working pro-actively with neighbouring authorities through the Duty to Cooperate to share some of the housing delivery.

The recognition that not all the housing requirement is likely to be accommodated within the Borough and the need to work with adjoining authorities through the Duty to Cooperate is welcomed. This is a realistic reflection of the likely potential for additional housing provision within the Borough. At page 14 of the Options Paper reference is made to the 2012 Strategic Housing Land Availability Assessment (SHLAA) and work following the Call for Sites in 2016 to update the land availability assessment.

As the Option Paper notes, the 2012 SHLAA identified potential development land for some 18,648 homes over a period to 2026. This potential was on some 122 sites classified as either having a high likelihood of development (category A) or being capable of development subject to overcoming constraints (category B). The SHLAA identifies the potential for 12,894 dwellings on category A sites and 5,754 dwellings on Category B sites. To meet the identified housing requirement would rely on all the identified SHLAA sites delivering as expected.

This is clearly an unrealistic expectation. There are a number of reasons why SHLAA sites may not come forward, including unresolvable technical constraints and land ownership issues. Sites may be in active use and, notwithstanding submissions to the SHLAA, land owners may wish to continue with the existing use.

The Options Paper refers to the potential for housing on existing open space and employment areas. As the Paper acknowledges there is a tension between the need to release such sites for housing and the need to retain areas of open space and land for employment uses. The Paper notes that opportunities to utilise open space and existing employment land is likely to be limited.

It is increasingly clear that Northampton Borough will not be able to accommodate all its housing requirements as set out in the JCS over the current plan period to 2029. It is therefore critical that the Council works proactively with neighbouring authorities, including Wellingborough Borough Council to look at and reach agreement on how any unmet need can be accommodated most sustainably. Land to the east of Northampton represents a sustainable option for accommodating unmet needs that may be identified and should be considered as part of the process of engagement with neighbouring authorities through the Duty to Cooperate.

The Options Paper asks whether a 20% buffer should be applied to housing supply in accordance with the National Planning Policy Framework (NPPF). As the Options Paper notes, a recent appeal decision has confirmed that the Borough Council has persistently under delivered in terms of its housing requirement and therefore a 20% buffer should be applied in accordance with paragraph 47 of the NPPF.

In addition to the issue of an appropriate buffer for the five year land supply, the Council should also consider building in flexibility in terms of overall provision to ensure that housing requirements are delivered in the plan period. The Local Plan Expert Group report to Government dealt with the issue of flexibility and the need for plans not only to ensure a 5 year supply of housing land, but also to ensure a more effective supply of housing land for the medium to long term. The report recommends the provision additional flexibility over and above the identified objectively assessed housing need, along with provision for developable reserve sites equivalent to 20% of a council's housing requirement (para 11.4 and recommendation 41, Local Plans Expert Group Report). This is an approach that the Council should adopt in preparing its Part 2 Plan.

Question 10 of the paper asks whether the plan should specify a threshold or proportion of serviced plots to ensure the delivery of custom-build and self-build plots. In response to consultations on other Local Plans, the Home Builders Federation (HBF) has outlined concerns over such threshold policies. In particular, such an approach provides no additionality to land supply but rather changes production from one type of builder to another. The HBF also note practical problems associated with implementing a restrictive/threshold policy including health and safety implications, working hours and length of build programmes. The Inspector's report on the East Devon Local Plan expressed reservations about the implementation difficulties associated with threshold approach. It is more appropriate to identify specific sites appropriate for self build/custom build rather than seek a proportion of units on sites to be available for self build/custom build.

I hope the above comments are helpful. If you need any further information please let me know.

Yours faithfully

A large black rectangular box redacting the signature of Guy Longley.

GUY LONGLEY
Director