

From: [REDACTED]
Subject: Northampton Local Plan (Part 2) Options Consultation - Persimmon Homes Midlands Representations
Date: 02 November 2016 13:17:08
Attachments: [Northampton Borough Council Representations.pdf](#)

Good morning,

Please find attached Persimmon Homes Midlands' representations in response to the Northampton Local Plan (Part 2) Options Consultation.

Please confirm receipt of this email.

Kind regards,

Jodi Stokes
Planner

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PERSIMMON HOMES REPRESENTATIONS

NORTHAMPTON BOROUGH COUNCIL LOCAL PLAN (PART 2)

**OPTIONS CONSULTATION PAPER AND SUSTAINABILITY
APPRAISAL**

NOVEMBER 2016

PRODUCED BY:

**Persimmon Homes Midlands,
3 Waterside Way,
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Northampton
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Introduction

This document constitutes Persimmon Homes Limited's formal response to the consultation on the Northampton Local Plan (Part 2). We provide comments on the various issues that are relevant to us, providing constructive and conclusive feedback that should help advise Northampton Borough Council on taking forward Part 2 of their Local Plan.

Our Comments

Question 1 - Do you have any comments on the vision for the Northampton Local Plan (Part 2)?

Persimmon Homes Midlands support Northampton Borough Council's vision for the period up to 2029 to "provide a balanced range of high quality housing to meet different housing needs". The Council must plan effectively to meet their Objectively Assessed Need in this period as well as to meet their specific housing needs as defined within the Strategic Housing Market Assessment.

Question 2 - Do you think there are other objectives that should be included?

No comment.

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

As defined in a recent appeal decision (APP/V2825/A/14/2228866) the Borough Council have persistently under delivered housing and therefore a 20% buffer should be applied to their five year housing supply. This point has been concluded by an inspector and a buffer will ensure the best chance of the Council achieving their vision and objective "to provide a range of housing in sustainable locations, seeking to ensure all residents have access to a home they can afford and that meets their needs". This is supported by Paragraph 47 of the National Planning Policy Framework (2012), which states that Councils should "identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their requirements within an additional buffer... of 20% to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land."

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?

There is a finite supply of land available in the Borough and every effort should be made to provide housing in the most sustainable locations within Northampton's boundary and in close proximity to key transport links. Persimmon Homes Midlands believes that SUE's

should go beyond the 35 dwellings per hectare minimum set out in the West Northamptonshire Joint Core Strategy and should actually achieve densities of an average of 40-45 dwellings per hectare. Other residential schemes within the Borough Council should achieve a minimum density of 40 dwellings per hectare in order to make the most efficient use of available land. We also agree that this minimum density should be met when locating housing near key centres or transport corridors.

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?

When considering prospective sites there should be focus on those that are available and deliverable within the plan period. We agree that their should be focus on those available in the short term as the Borough Council is heavily reliant on their numbers being achieved through Sustainable Urban Extensions, which is reality are likely to be delivered later on in the plan period and beyond.

Question 6 – What other actions would help new homes to be built and completed more quickly on the identified sites for housing development?

There should be flexibility in the application of policy requirements relating to the provision of affordable housing and requirements to meet housing standards beyond building regulations in the short term in order to encourage delivery.

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?

Persimmon Homes Midlands agree that sites should be identified for these types of housing where there is need evidenced and supported by the Council's Strategic Housing Market Assessment. This is supported by Paragraph 50 of the NPPF (2012) which states that the Local Plan should "identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand". This includes the provision of a mix of housing for "different groups in the community".

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

The proportion of different sized houses within a particular development should be informed by both the Council's Strategic Housing Market Assessment and the market. It is vital that we are providing the homes that people need and want. Although the SHMA will be an indicator, the house building industry also has expert knowledge on what is required in the market. Affordability

Question 10 – Should the plan specify a threshold or proportion of serviced plots to ensure the delivery of custom-build and self-build plots?

Any policy of this type should be evidenced and supported by the Council's Strategic Housing Market Assessment. It would not be an efficient use of resources to provide such plots without specific evidence and market demand to do so.

Question 11 – Do you agree that there is a demand for more small scale office space, especially in the town centre?

No comment.

Question 12 – Do you think that dated, low value office stock in the town centre is oversupplied?

No comment.

Question 13 – Do you agree that outside the town centre, some medium and larger office allocations should be released to provide small of medium sized industrial and distribution uses to help meet demand for these uses?

If there is evidence from the market that land allocated for medium and larger offices is no longer required then this land should be made available for alternative uses. The Council should have evidence to support their conclusions regarding how the land should instead be used.

Question 14 – In demonstrating that existing employment sites have been actively marketed before they are considered for release to other uses, should active marketing be required to be undertaken for a minimum period of 12 months or 24 months?

A period of 12 months would be an ample period of time to assess interest from the market.

Question 15 – Do you agree that we should allow more flexibility in some smaller centres for other uses to be introduced?

No comment.

Question 16 – Do you agree that we should review the secondary retail frontages policy, which restricts non-retail uses in some sections of frontage, to allow greater flexibility for non-retail uses in some areas?

No comment.

Question 17 – Do you think that within the town centre, some of the medium and larger sized office allocations are oversupplied?

No comment.

Question 18 – Are there any other Development Management policies that you think should be included in the Northampton Local Plan (Part 2)?

We require further information on the Affordable Housing requirement. The West Northamptonshire Joint Core Strategy proposed 35%. This is applied to housing schemes of 15 or more. The inspector agreed with these assumptions when the Joint Core Strategy was adopted, however, there should be further clarity in the part 2 plan. This should be supported by relevant evidence from the Strategic Housing Market Assessment.

We would like to reiterate our previous comments made in June this year that more clarity should be provided on the Brownfield Register and Permission in Principle, and how this will sit alongside the Local Plan (Part 2) and any housing allocations it makes.

Question 19 – Do you have any comments on the Sustainability appraisal of the Options Consultation Paper?

Paragraph 4.14: *“Prioritising sites that can be delivered in the short-term or allowing for greater flexibility through a 20% housing land supply buffer, could potentially undermine or dilute the delivery of the spatial strategy if easy to deliver sites that are less well aligned with the strategy of higher densities in the town centre, other centres and key transport corridors were to come forward at the expense of, or in advance of, sites that are more challenging to deliver but better aligned with the strategy”.*

Frontloading the plan with smaller, deliverable sites enables the Council to achieve its five year land supply early on in the plan and take pressure from the Sustainable Urban Extensions that achievable and deliverable but more complex to implement due to the scale of infrastructure etc that is involved. This frontloading is not to the detriment to the Sustainable Urban Extensions that are at the heart of the Joint Core Strategy and that should be supported by the Part 2 Local Plan that Northampton Borough Council is now producing.

Paragraph 4.17: *“An uncertain effect (?) is expected for all options against SA objective 15: Efficient use of land”.*

This comment is in regards to uncertainty of the specific sites that will come forward as part of the Part 2 Plan.