From:

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Subject: REPS ON OPTIONS CONSULTATION PAPER SEPT-NOV 2016 NORTHAMPTON LOCAL PLAN PART 2

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Attachments: <u>image00</u>

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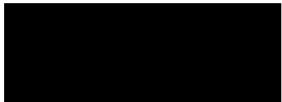
Hello local Plans and Policy

Please find attached comments made on behalf of the Althorp Estate.

We look forward to hearing from you.

Regards

Stephen Lucas MRTPI





25 October 2016

Planning Policy Team Northampton Borough Council The Guildhall Northampton NN1 1DE

Dear Sirs

CONSULTATION RESPONSE-OPTIONS CONSULTATION SEPTEMBER-NOVEMBER 2016: REPRESENTATIONS MADE ON BEHALF OF THE ALTHORP ESTATE:

We refer to the above document and make our representations in the order they appear in the Options Consultation Paper.

Background and Initial Comment:

The requirement to build out by 2029 18,870 new homes is certainly a significant challenge for Northampton and we note that it is stated the council will adopt a "positive and proactive approach". We would concur that the housing requirement needs to be met from the larger schemes, infill sites and brownfield sites. This approach is welcomed and we would like to engage with you as soon as possible about our proposal site at Mill Lane Dallington LAA 1096 refers.

With regard to the comments positive and proactive this local Plan needs to be speedily prepared as the town needs a progressive local plan policy base. For too long the town has been stymied by an outdated 1997 local plan. We trust that a *positive* approach will be the watchword for the plan.

Comments on New Home Provision:

For some years the Estate have been involved in discussions on a part brown field site in Mill Lane Dallington and the West Northamptonshire Planners were extremely positive in their assessment of the site. We would welcome a meeting with members of your policy planning team to discuss a draft approach to move this site forward.

We note the comment on brownfield land and are slightly concerned about the time being taken to move these forward with the updated SHLAA information. We would be pleased to hear what has happened to the representation on the above site we made in June and would submit further information if that is required. Certainly we are aware no member of the policy team has visited the site-but we would be pleased to assist further.

Comments on Options Questions:

Question 3: 5 year housing Land Supply:

It is quite clear Government planning policy requires a 20% buffer must be applied to housing supply when there has been a significant 5 year housing land supply shortfall.

Question 4: Housing Density:

We believe a blanket 35-40 dwgs per hectare housing density imposition should be avoided —common sense dictates it is must be down to site context, site surroundings and the type of housing to be provided.

Question 5: Site Allocations:

Yes, the plan and the SHLAA should really invest in moving forward with sites which can be which can be developed in the short term. There is an immediate housing requirement – this should be tackled as a matter of urgency.

Question 6: Speed of Implementation:

Our answer is to move forward quickly with the SHLAA. If further information concerning land availability is needed then owners and agents should be contacted and given a short time period to respond.

As for our clients site in Mill Lane Dallington the fact is that the land is has been available for development for many years but has had to be put on hold pending a new local plan is a clear indication that there needs to be a fresh approach to development opportunities.

Unfortunately it is our experience that the old 1997 local plan has been used against credible development opportunities-it really is time for a new positive planning experience and planning policy base.

Questions 7 and 8: Specialist Housing and Older Persons Housing:

Yes - but with respect the planning authority does not generally have the benefit of specialist expertise. It is therefore essential for the planning authority to engage with appropriate providers, land owners and consultants with the requisite expertise and knowledge.

Question 9: Allocations and smaller market housing:

This question goes to the heart of the housing need issue. What type of housing is required in Northampton now and in the future, what does the specialist information show?

Clarity on this is required at the outset of the plan process and this information should be updated at least every 2 years.

Question 10: Serviced Plots:

What is the need in Northampton? The NPPF requires the borough council to keep a list of this information – is one now available?

Questions 11-13: Offices:

What do the council's specialist advisers report on these aspects?

Question 14: Employment Sites:

The period of marketing you identify as being 12-24 months is far too excessive: a maximum period of 3 months might be appropriate, but even that might be too onerous given the operating conditions for many businesses.

It must be realised that Northampton is in competition with other towns: therefore what advice is being offered from the specialist surveyors employed by the borough on this aspect?

Parking (page 11):

Noting the comment above concerning competition with other centres.

The town lives or dies on what it can offer; namely the all - round ambience, what parking facilities / charges and what facilities the town can offer etc. Therefore the question of parking charges must be considered even though this is not strictly a land use issue but clearly the effects of parking charges are

important to consider. There is a leakage of trade to Milton Keynes-what can the Borough Council do about that? This plan must provide some answers.

Questions 15-17: Central Area and Retail centres:

No comments:

Planning for Northampton's Growth:

The 2012 SHLAA is out of date.

We have noted the council will "explore all reasonable options to provide land to accommodate new homes".

Once again we emphasise our willingness to meet and discuss future possibilities at the Mill Lane site in Dallington.

Development Management Policies:

The plan needs to be kept simple and easily read. Too often planning policy documents are too long and too detailed, meaning for many users they will not be read and understood-this is a very real issue. Therefore we are against a plethora of policy documents-simplicity and clarity are needed in this plan.

Having noted the above comments there needs to be an awareness and understanding of changing life styles which impact on the provision of housing and employment.

For too long the 1997 plan has reflected a largely obsolete view of society. The emergent local plan must be 'future-proofed' and in this respect council planners need to be fully cognisant of emergent life-styles so that the plan is relevant and proactive as a policy document going forward there needs to be a flexibility of attitude and simplicity of policy.

We thank you for allowing us to comment further on the emergent plan and we look forward to hearing from you further concerning our Mill Lane site (LAA 1096).

Yours faithfully STEPHEN LUCAS MRTPI LUCAS LAND & PLANNING

Moulton Park Business Centre Redhouse Road Moulton Park Northampton NN3 6AQ