

**From:** [REDACTED] on behalf of [REDACTED].  
**To:** [REDACTED].  
**Subject:** Northampton Local Plan Part 2 Options Consultation Paper  
**Date:** 28 October 2016 11:50:47  
**Attachments:** [NBC Options consultation officer response.pdf](#)  
[NLP Options comments form Daventry.pdf](#)  
[NLP Options Comments Form Daventry.docx](#)

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Dear Sir or Madam

Please find attached a letter and comments form in respect of the Options consultation (I have also attached a Word version of the comments form if this format is easier for you). It should be noted that owing to the timescales it has not been possible to take the response through Strategy Group and the response is therefore an officer one.

I would be grateful for an acknowledgement of receipt.

Thank you.

Kind regards

Jane

Jane Parry  
Senior Policy Officer (Planning)  
Daventry District Council – Business Team  
Lodge Road, Daventry, Northamptonshire, NN11 4FP  
[REDACTED]

\*\*\* View the latest Daventry Calling magazine at  
<https://www.daventrydc.gov.uk/your-council/news/daventry-calling/> \*\*\*  
Daventry District Council, Lodge Road, Daventry, Northamptonshire, NN11 4FP

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Daventry District Council is committed to the concept and practice of sustainable development.

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28 October 2016

Claire Berry  
Planning Policy & Heritage Manager  
Regeneration, Enterprise & Planning  
Northampton Borough Council  
Guildhall  
St Giles Square  
Northampton  
NN1 1DE

*Team:*

Business

*Please respond to:*

Jane Parry

*Direct Line:*

[REDACTED]

*E-mail:*

[REDACTED]

*Our Ref:*

*Your Ref:*

Dear Claire

## **Re: Northampton Local Plan (Part 2) Options Consultation Paper**

Daventry District Council welcomes the opportunity to comment on the Northampton Local Plan (Part 2) Options Consultation Paper. Please see below Daventry District Council's (DDC's) response to this consultation. Please note that this is an officer response.

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

The appeal decision referred to is based in part on what happened prior to 2011, but this was a 'growth' figure, as Northampton was part of the Milton Keynes and South Midlands Growth area, it was not an OAHN requirement, therefore assessment against this requirement is arguably not appropriate. The Borough would be best focused on the period from 2011 when there was an objectively assessed housing requirement in place against which to judge its past delivery. The Borough should also take into account the level of supply of sites in the Borough. The current shortfall appears to not be a lack of sites, but less than optimum delivery of the sites which are available. Therefore the approach in the NPPF to further increase the supply of sites by providing more options (which could work where supply is an issue) could be more harmful than beneficial as it dissipates rather than focuses the efforts of housebuilders, infrastructure providers, utilities providers etc. on delivery. The Borough is asked to be more transparent about its supply of sites and is urged to do even more to bring them forward (see also answer to question 5).

A recent appeal decision in East Northamptonshire involved the appellant arguing for a 20% buffer, citing a persistent under-delivery of housing by the local planning authority. The inspector did not agree with the appellant. Over the past 15 years, the Council demonstrated a commitment to achieving high levels of completions in the first seven years and again in the past two years. The Inspector did not consider that that the under performance in the intervening period could be solely substantially attributed to under-delivery by the Council and had more to do with the economic recession.

Based on this evidence, 20% is not considered to be an appropriate buffer because it refers to a period when the economic recession impacted on delivery which does not give a realistic indication of longer term delivery over the plan period.



*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 transport corridors?*

The use of a residential density calculator should be more sophisticated than a blanket figure outside the SUEs to take account of character and location as specified in the question e.g. centres and 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?*

It is important that there is a sufficient supply of readily deliverable sites to address the current shortfall in the NRDA's 5 year supply and to deliver the spatial strategy of the West Northamptonshire Joint Core Strategy. It is also important that the Borough has a sound strategy for the longer term to ensure that the supply of sites is maintained. As commented on previously at Issues Consultation stage, DDC urges the Borough Council to produce a Housing Implementation Strategy in accordance with the NPPF to demonstrate how the 5 year land supply will be achieved and maintained, and is pleased that it has now resolved to do so. It is important that this is produced as quickly as possible and that it has a series of robust actions to help bring forward the supply.

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

It is important that the Borough Council actively engages with developers and landowners of identified sites and works with partners to understand potential issues and barriers to sites coming forward and to find jointly agreed solutions.

*Question 7 - Do you agree that we should identify sites for specialist housing?*

Yes, the Core Strategy identifies the need for all forms of housing to be provided for. The current evidence base work on understanding some forms of specialist housing should help to inform this.

*Question 8 - Do you agree that we should identify sites specifically for the provision of older persons housing?*

Yes, as per question 7.

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

In all cases, the Local Plan strategy will be informed by up-to-date evidence which will set out identified needs.

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

If there is sufficient evidence of need, then it would be appropriate to do so.

*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?*

It is necessary to strike an appropriate balance between giving a realistic time frame for the site to be actively marketed, and also not too long such that opportunities for other forms of suitable development are lost. On balance a period of 12 months in the current relatively buoyant market seems reasonable.

*Question 15 – Do you agree that we should allow more flexibility in some smaller centres for others*



**INVESTORS  
IN PEOPLE**

Silver

*uses to be introduced?*

Yes, in particular residential uses.

I hope that you will find these comments helpful. We would of course welcome further opportunities to be involved as the plan develops including through duty to co-operate meetings.

Yours sincerely



Jane Parry  
Senior Policy Officer (Planning)



**NORTHAMPTON**  
BOROUGH COUNCIL

## **Northampton Local Plan (Part 2)**

**Comments Form and Guidance Notes**

**Options Consultation Paper  
and Sustainability Appraisal**

**Northampton Borough Council  
September 2016**



*Northampton*  
**Alive**

## **Consultation Guidance Notes**

- Northampton Local Plan (Part 2) Options Consultation
- Sustainability Appraisal of the Options Consultation Paper

Northampton Borough Council is inviting your comments on the Northampton Local Plan (Part 2) Options consultation and the accompanying Sustainability Appraisal.

This follows the Scope and Issues consultation which was undertaken between April and June 2016. It focuses in more detail on some of the key issues in preparing the Northampton Local Plan (Part 2) and will form the second formal stage of the local plan preparation process.

The Options consultation paper sets out a vision for Northampton for 2029, the objectives which the Northampton Local Plan (Part 2) will be seeking to achieve and the strategy that will underpin future development and regeneration activity across the Borough. It sets out some of the key challenges that the new Local Plan (Part 2) will need to address, focusing on the delivery of growth, particularly the challenges of delivering new homes, economic prosperity and the future role of our centres, in a sustainable and deliverable way. The strategy sets out how the Council can plan positively for the new homes and jobs, whilst protecting and enhancing the natural and historic assets within the borough. The vision, objectives and strategy are informed by the West Northamptonshire Joint Core Strategy Local Plan (Part 1) and responses to the Northampton Local Plan (Part 2) Scope and Issues consultation.

The Central Area Action Plan (CAAP) 2013 contains development plan policies for Northampton town centre and its immediate surrounding area. Some policies have now been superseded by recent development and/or changes in legislation, such as recent changes affecting permitted development rights, and need updating. It is proposed that the new Local Plan (Part 2) will contain those CAAP policies which remain up to date and any CAAP policies which need updating. Once adopted, the new Northampton Local Plan (Part 2) will supersede the Central Area Action Plan.

The accompanying Sustainability Appraisal considers the likely significant effects that the Local Plan may have on various environmental, economic and social factors.

**The consultation period runs from Wednesday 21 September to 5pm on the 02 November 2016.**

### **Where can I view the consultation documents?**

You can view the consultation documents in the following ways:

- On the Council's consultation portal at <http://northampton.gov.uk/localplan>  
This system also allows you to submit comments.
- At the Guildhall One Stop Shop, Northampton Borough Council, St Giles Square, Northampton NN1 1DE

- At all libraries in Northampton Borough

If you do not have access to a computer, you can request paper copies by:

telephoning 01604 837326

Or by writing to

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

If you would like copies of consultation documents in translated or other formats please refer to the Council's website at:

<http://www.northampton.gov.uk/info/200041/equalityanddiversity/1309/interpreting>

### **How can I comment?**

You can comment on the consultation documents in one of the following ways:

**Online:** <http://northampton.gov.uk/localplan> OR

Complete the comments form which you can download from the website. By using the comments form, it helps us ensure we have all the correct information to register and process your comments and keep you informed. Once completed you can do the following:

**Email:** [planningpolicy@northampton.gov.uk](mailto:planningpolicy@northampton.gov.uk) OR

**Post:** Northampton Local Plan (Part 2) Options Consultation, Planning Policy, Regeneration, Enterprise & Planning Directorate, Northampton Borough Council, The Guildhall, St Giles Square, Northampton NN1 1DE (using the comments form available on the website)

All the above can be found by accessing the following link:

<http://northampton.gov.uk/localplan>

**Responses should be submitted by 5pm on Wednesday 02 November 2016.**

Please note that comments submitted to the Issues Consultation do not need to be sent again.

### **How will my comments be used?**

The Council will consider your comments in progressing work on the Northampton Local Plan (Part 2). Comments received will be published on the Council's consultation portal in accordance with the Data Protection Act.

Responses will be reported to the Council's Cabinet Advisory Group, which advises on the preparation of the Northampton Local Plan (Part 2). They will also be reported in summary to the Council's Cabinet.

If you are organising a petition or intend to, or have signed one, it must be submitted by the deadline and be accompanied by the name and contact details of the petition organiser. The Council will only register the petition organiser on its Local Plan consultation database and future notifications will only be sent to the petition organiser. The number of signatories to the petition will be recorded.

Following the consultation, a feedback report will be produced setting out the main issues raised. Consultation responses will be used to inform preparation of the following:

- Draft Northampton Local Plan (Part 2)
- Sustainability Appraisal of the Draft Local Plan (Part 2) **Fair**

### **Processing Notice issued under The Data Protection Act 1998**

All observations, objections and supporting comments submitted to Northampton Borough Council are public documents. Therefore the information you submit in response to consultations on the Local Plan **will be** publicly available as part of the consultation responses and made available for any member of the public to view in person. This may include your name and the comment made. Specific personal contact data such as your email address, signature, postal address and telephone number **will not** be published on the Northampton Borough Council website but retained for contact purposes only by the planning department at Northampton Borough Council.

In submitting a comment on the Local Plan you agree for your information to be held and processed for the purpose(s) and in the way detailed above.

If you have any questions, please contact us by email at:  
[planningpolicy@northampton.gov.uk](mailto:planningpolicy@northampton.gov.uk) or by telephone: 01604 837326.

<b>Your Contact Details</b>		
	<b>Your Details</b>	<b>Agents Details (if applicable)</b>
<b>Name</b>	Jane Parry	
<b>Organisation</b>	Daventry District Council	
<b>Position</b>	Senior Policy Officer (Planning)	
<b>Email</b>	████████████████████	
<b>Telephone</b>	██████████	
<b>Address</b>	Lodge Road	
<b>Town</b>	Daventry	
<b>Postcode</b>	NN11 4FP	
<b>Your Role</b>	<b>Are you the Landowner, Land Agent, Developer, Housing Association, Planning Consultant, Other?</b>	
	Adjoining local authority	

**Northampton Local Plan (Part 2)**

**Consultation on the Options Paper**

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

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

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

The appeal decision referred to is based in part on what happened prior to 2011, but this was a 'growth' figure, as Northampton was part of the Milton Keynes and South Midlands Growth area, it was not an OAHN requirement, therefore assessment against this requirement is arguably not appropriate. The Borough should, in making its decision, focus on the period from 2011 when there was an objectively assessed housing requirement in place against which to judge its past delivery. The Borough should also take into account the level of supply of sites in the Borough. The current shortfall appears to not be a lack of sites, but less than optimum delivery of the sites which are available. Therefore the approach in the NPPF to further increase the supply of sites by providing more options (which could work where supply is an issue) could be more harmful than beneficial as it dissipates rather than focuses the efforts of housebuilders, infrastructure providers, utilities providers etc. on delivery. The Borough needs to be more transparent about its supply of sites and what can be done to bring them forward (see also answer to question 5).

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In all cases, the Local Plan strategy will be informed by up to date evidence which will set out identified needs.

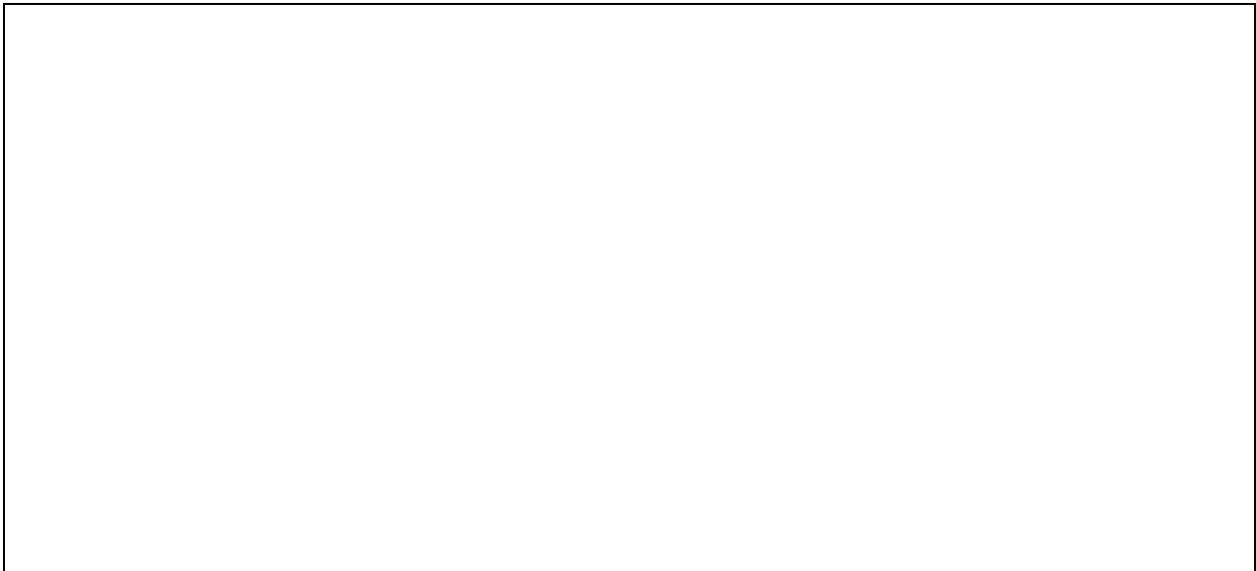
**Question 10 – Should the plan specify a threshold or proportion of serviced plots to ensure the delivery of custom-build and self-build plots?**

If there is sufficient evidence of need, then it would be appropriate to do so.

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



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



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

**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?**

It is necessary to strike an appropriate balance between giving a realistic time frame for the site to be actively marketed, and also not too long such that opportunities for other forms of suitable development are lost. On balance a period of 12 months in the current relatively buoyant market seems reasonable.

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

Yes, in particular residential uses.

**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?**

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



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



## **Northampton Local Plan (Part 2)**

### **Consultation On The Sustainability Appraisal of the Options Consultation Paper**

When preparing a Local Plan, the Council is legally required to undertake an environmental appraisal of its proposed plans and policies, as well as a Strategic Environmental Assessment (SEA). There is a requirement to consider the social, economic and environmental impacts of the policies in the Local Plan.

#### **Question 19 - Do you have any comments on the Sustainability Appraisal of the Options Consultation Paper?**

Please identify the page, paragraph number(s), table or appendix within the Sustainability Appraisal to which each of your comments applies.