

From: [REDACTED]
Subject: Local Plan
Date: 07 October 2016 09:06:00
Attachments: [image001.jpg](#)
[DWH Local Plan 2 Options Consultation Reprs.pdf](#)

Dear Sirs,

Please find attached David Wilson Homes Local Plan 2 Options Consultation Representations. I would be grateful if you could acknowledge receipt of this submission.

Yours faithfully

Ross

DWH Portrait Logo



Ross Blumire MRTPI

Strategic Planner

David Wilson Homes South Midlands

Switchboard 01604 784000

Direct Dial [REDACTED]

Mobile [REDACTED]

e-Mail [REDACTED]

1a Fortune Close | Riverside Business Park

Northampton | Northamptonshire | NN3 9HT

www.barratthomes.co.uk

www.wardhomes.co.uk

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

7th October 2016

Dear Sirs,

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

Please accept this letter as David Wilson Homes South Midlands consultation response to the Northampton Local Plan (Part 2) Options Consultation.

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

Yes, a 20% buffer should be applied to the housing land supply. It was clearly set out in the Appeal: APP/V2825/A/14/2228866 that the Council have undersupplied housing consistently for the last 13 years and had a cumulative shortfall of 2,929 dwellings over the last 7 years. The shortfall should be addressed utilising the Sedgfield method (preferred by the Inspectorate) and a constant supply planned for.

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?

A residential density target is acceptable as long as all other policies reflect this target. The requirements for amenity space and parking provision for example, must reflect the higher densities to enable enough land for appropriate development. High requirements for amenity space or parking provision are land hungry and will make achieving high density unviable. Each site should be judged on its own merits and densities should be a target as opposed to an absolute requirement. The NPPF already supports efficient use of land.

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

No, it is necessary to allocate sites to ensure provision across the whole plan period and not just those that can be delivered quickly. If sites are not allocated for delivery across the whole plan period, the issue of being unable to demonstrate a Five Year Housing Land Supply will reoccur further in to the Plan. The Council must allocate sites that can be delivered immediately and those that will delivery sites throughout the plan period. It may be that larger strategic sites can provide houses in the short term and then through the plan period.

The site to the south of Wooldale Road can provide sites in the short term with an initial development to the west of Quinton Road within Northampton Borough Council's boundary. A more strategic



development on the east side of Quinton Road within South Northamptonshire's boundary and immediately adjacent to the NRDA can provide 1,200 homes across the plan period, continuously contributing to the Five Year Housing Land Supply.

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

The largest delays are in securing planning permissions and completion of S106 agreements. A clear 'buy-in' from Planning Officers and Planning Committee Members to support sites allocated within the Local Plan is crucial to avoiding unnecessary delays and in line with the NPPF. Proactive and forceful chasing of third party consultees is also important to reducing the time applications are delayed in the planning system. When Planning Applications are granted the use of Conditions should only be applied when absolutely necessary to avoid delays to starting on site. Where conditions are necessary the timing of these should be carefully considered and only be pre-commencement where essential.

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

No. Supportive policies for specialist housing are ok but the location of specialist housing should be flexible and identified by the providers of these units. Land should not be unnecessarily sterilised by an inappropriate allocation.

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

No. Supportive policies for older person housing are ok but the location of such housing should be flexible and identified by the providers of these units. Land should not be unnecessarily sterilised by an inappropriate allocation.

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

No, prescribed housing mixes should be avoided. The mix of private housing on development schemes should be decided by the house builders, as they know the market and will build the houses most desired in order to maximise values. House builders will respond to market forces and build the appropriate product, so if there is a clear need for smaller market dwellings these will be built by the developers. Proposals to increase densities within the town centres, other centres and along key transport corridors are likely to have the effect of increasing the provision of smaller market dwellings.

A preferred mix for affordable housing could be considered but this must include a degree of flexibility to reflect the uncertainties around affordable housing provision and Central Government policy changes and site specific considerations.

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 a threshold or proportion of serviced plots are to be considered, this would need to come from the affordable housing provision and not the private housing provision. Further eroding the level of private housing provided on a site via the introduction of such a provision would affect the viability of sites and would likely reduce the number of sites coming forward or lead to delays in negotiations through planning (due to viability negotiations on affordable housing provision and S106 payments).

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 or 24 months?

The minimum period for active marketing should be 12 months to avoid sites being unnecessarily restricted from changing use to one that is required. The NPPF is clear that sites should not be subject to long term protection and should respond to market signals under regular review. It is considered unlikely that a site marketed for 2 years is any more likely to be purchased for the original use than a site marketed for 1 year.

I trust you find all the representations in order, however, should you require any further information, please do not hesitate to contact me.

Yours faithfully,



Ross Blumire
Strategic Planner
David Wilson Homes (South Midlands)
(a trading name of BDW Trading Ltd)

Direct Dial 
Email: 