

From: [REDACTED]
Subject: Local Plan- Representation on behalf of Davidsons Developments Limited
Date: 01 November 2016 16:31:23
Attachments: [Options Consultation- October 2016.pdf](#)

Please find attached a response made on behalf of Davidsons Developments Limited in respect of the Local Plan Part 2 Options Consultation.

My contact details can be found within the letter, or below. I would be grateful if you could ensure that these details are correct in the consultation database to ensure that I receive updates on the progress of the Local Plan and other Development Plan documents.

Should you have any questions, or require further information in respect of our response, please do not hesitate to contact me.

Kind regards,
Ellie



Eleanor Gingell
Principal Planner, Planning

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Before you print, please think of the environment.

Your ref: LAA1006:Land off Upton Way, Pineham
Our ref: ELG/36219
DD: 01908 206755
E: [REDACTED]
Date: 28th October 2016

Claire Berry
Planning Policy and Conservation Manager
Northampton Borough Council
Northampton Borough Council,
Guildhall, St. Giles Square,
Northampton,
NN1 1DE

Dear Claire

**NORTHAMPTON LOCAL PLAN PART 2
RESPONSE ON BEHALF OF DAVIDSONS DEVELOPMENTS LIMITED- SITE LAA10006**

I write on behalf of my client, Davidsons Developments Limited (DDL) in response to the current consultation on the Local Plan Part 2 document, which closes on 2nd November 2016. This document is presently at the Options stage, which builds on the Issues consultation carried out earlier this year. The Local Development Scheme indicates that the plan will be submitted for examination during 2017 with adoption presently envisaged in 2018.

As noted within the response to the Issues Stage, DDL has an active interest in respect of land at Pineham. This site is being assessed as part of the Call for Sites process as LAA1006: Land off Upton Way, Pineham. DDL consider this site could be suitable for approximately 70 dwellings, together with open space, landscaping and the necessary surface water attenuation. Moreover, DDL believe that development at this location could bring about wider opportunities such as the delivery of a more natural, landscaped edge to the existing development to the South (Pineham).

As previously expressed, DDL has concerns in respect of the plan period. Once adopted in 2018 (assuming no delays to the timetable) DDL is concerned that the plan will not have a full 15-years, as recommended in paragraph 157 of the NPPF. Furthermore, and perhaps of a greater concern is, as a condition of the WNJCS being found 'sound' a review is to be undertaken to be adopted no later than 2020 (it is understood that no formal work has commenced on this review to date). After this date, DDL consider the housing figures contained within the WNJCS cannot be considered up to date and will not carry full weight. As the Part 2 local plan must follow the strategy of the WNJCS, there is a concern that the Part 2 Plan will be 'out-of-date some 2 years following adoption. This would leave the authority, and the villages on the outskirts of the town (located in neighbouring districts), vulnerable to 5 Year Land Supply Challenges.

Furthermore, DDL has reservations in respect of how the Part 2 Local Plan addresses the relationship between the Borough's fringe and neighbouring districts. DDL therefore believe that there remains a pressing need to review opportunities for small-medium scale sites within the Northampton sub-Housing Market Area. Any allocations should be made in accordance with the settlement hierarchy, as set out within the WNJCS. This means that the focus should be on sites within the Borough Boundary, such as LA10006, sites that adjoin the Borough Boundary but are within the neighbouring administrative areas and finally sites within the Northampton Sub-Housing Market Area villages that are within close proximity

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to the town (including those within the Borough Council of Wellingborough). This may be best addressed through a review of the West Northamptonshire Joint Core Strategy or other Joint Plan.

However, DDL acknowledge that the Part 2 Local Plan has a wider remit than housing allocations. Furthermore, DDL is aware that there are a number of issues to be overcome to enable the review of the WNJCS (or prepare a future Joint Plan). These matters, together with the pressing need for small and medium sites to be identified and brought forward in a planned and coordinated manner together with the necessary infrastructure improvements, mean that DDL cautiously support the current approach being taken by Northampton and the other partner councils in preparing Part 2 plans.

Our comments on specific questions set out within the Options Paper are set out below:

Vision and Objectives:

DDL are generally supportive of the vision and objectives. These appear to be broadly consistent with the adopted West Northamptonshire Joint Core Strategy (2014).

Question 3- application of a 20% Buffer

DDL agree that a 20% buffer is appropriate, and is consistent with the recent appeal decision (ref: 2228866) in respect Collingtree. It is important to acknowledge that the application of a 20% buffer does not increase the overall levels of development but, as suggested within the options document, means that a number of the allocated sites must be deliverable in the short to medium term (5 years). These sites should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within 5 years.

In addition to allocations, DDL would support the identification of broad areas where medium-scale development would be supported in principle, in accordance with Paragraph 47 of the NPPF. This approach would offer additional clarity and help to direct development to the most sustainable locations.

Overall, DDL consider sites such as LAA10006, which has the support of a residential developer, are crucial to ensuring that the strategy for the Local Plan Part 2 and the overall objectives of the WNJCS can be achieved.

Question 4- Density of Development

DDL do not support a blanket density of 40 dwellings per hectare.

Each site should be carefully master planned to ensure that it responds sensitively to its surrounding context. In some urban contexts, and around transport nodes this will be far in excess of 40 dwellings per hectare. However, in other locations such as on the rural-urban fringe a lower density, of around 30 dwellings per hectare, would be more appropriate to seek to ensure that effective landscape buffers and other measures, such as surface water attenuation, can be incorporated.

Question 5- Priority of allocations

DDL are promoting a site that they regard as deliverable within the shorter term (5 years). Whilst DDL consider the deliverability of a site should be a consideration for allocations, this should not override the consideration of the particular planning merits of individual sites and the contribution they will play in delivering the vision of the plan and the sustainable development of Northampton.

For example, site LA10006, is able to deliver approximately 70 homes, together with wider benefits to achieving a softer landscaped edge and opportunities for planting and other measures to support the Nature Improvement Area (NIA) and Green Infrastructure networks.

Question 6- Measures to speed up development

As noted in our response to the Issues consultation, the Local Plan Part 2 must identify a range of sites, both within and adjoining the Borough Boundary that are able to deliver in the shorter term.

In addition, DDL would welcome clear guidance on infrastructure requirements as part of the plan. This would help to minimise the requirement for negotiations with partners, such as Northamptonshire County Council in respect of highway improvements and education provision.

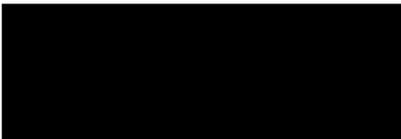
Additional Comments:

DDL support the exploration of the potential to utilise land defined as Open Space where it is of limited value, underused or no longer serves its designated purpose. Moreover, we agree with the sentiment that selective development on Open Space could provide the opportunity for improvements in quality.

Site LA10006 is considered to be a suitable site for allocation for approximately 70 dwellings. The site is considered to be sustainable, being located in close proximity to existing residential development at Pineham and future extensions to the town at Upton and Upton Lodge/ Norwood Farm (WNJCS policy N9 and N9a), which will offer a wider range of services. The site is being promoted by a residential developer and is considered to be available for development in the short-to-medium term and could contribute to meeting the housing need for Northampton. We therefore request that this site is allocated within the Part 2 Local Plan.

Should you wish to discuss any matters raised in our representation further, or require additional details of DDL's land interest, please do not hesitate to contact me on 01908 206755.

Yours sincerely,



Eleanor L. Gingell
Principal Planner