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Q1: Please provide your contact details in the boxes below:

| | |
|---------------------------|------------------------------|
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Q2: Are you are an agent responding on behalf of another? Yes

Q3: If you are an agent responding on behalf of another, please enter your details below:

| | |
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| Name | Jonathon Weekes |
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PAGE 3: Consultation on the Northampton Local Plan (Part 2)

Q4: Do you have any comments on the vision for the Northampton Local Plan (Part 2)?

No comment

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Q5: Do you think there are other objectives that should be included?

No comment

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Q6: Do you agree that we should apply a 20% housing land supply buffer to our housing land supply?

Yes, persistent under delivery results in the need for a 20% buffer for adequate housing land supply. This is a requirement of the NPPF.

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Q7: 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?

Raising density levels needs to be carefully considered. This should only occur where it is realistic, otherwise it simply results in an underprovision of residential allocations.

Raising densities changes the characteristics of developments. Where smaller units (1 and 2 beds) and flats are provided, there is greater scope to increase densities. This typically is in town centre locations and along key transport corridors. Elsewhere, raising the density simply results in the reduction to the size of the public and private spaces, which is to the detriment of the quality of the development and the potential health of its residents. In such scenarios, increasing densities would then have the potential to undermine objections 2 and 7 of the Local Plan Part 2.

However, one way in which the density could be increased for some smaller sites is if the number of dwellings allowed off private driveways was increased, say to 8 units. Private driveways require less land than public highways and thus the density can be increased without the need to reduce the level of associated green space.

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Q8: In allocating sites for housing development, do you agree that we should give priority to sites that can be delivered in the short term?

Yes

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Q9: What other actions would help new homes to be built and completed more quickly on the identified sites for housing development?

- A discount on the Community Infrastructure Levy
 - Production of realistic development briefs on key sites
 - Self-build allocations where infrastructure is provided up front
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Q10: Do you agree that we should identify sites for specialist housing?

'Specialist housing' is a non-descript term, so it is difficult to be precise in a response. There is some merit in providing homes for the elderly in locations close to local services and transport routes, but even the allocation of specific sites for this purpose has the potential to stifle development through over-prescription of land uses.

Market forces tend to direct the provision of all housing types, including specialist housing, and planning policy needs to respect this. A better approach would be simply the provision of sufficient land for housing purposes, including reserved sites so that land values are more realistic and delivery more consistent.

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Q11: Do you agree that we should identify sites specifically for the provision of older persons housing?

As per previous answer.

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Q12: Should allocations for general housing include a proportion of smaller market dwellings (1 and 2 bed)?

As with specialist housing, the good intentions can be identified through this question. However, the outcome may be negative as it may lead to a greater dictation of housing sizes if it is this specific. A better approach would be to include a policy which outlines a need to provide a mix of housing that largely reflects the identified needs of 'general housing' within the Borough/sub-area, based upon an up to date housing needs assessment.

Alternatively, leave it to market forces to dictate the size of the properties – builders will only construct properties that are required by the market!

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Q13: Should the plan specify a threshold or proportion of serviced plots to ensure the delivery of custom build and self build plots?

If self-build plots are to be supported by the Council, careful consideration of how these will come forward and how planning will deal with them needs to be undertaken. If a threshold is proposed in the same way as with affordable housing provision, then this may cause difficulty in terms of implementation.

Realistically, they can only be incorporated within the SUEs or on specifically designated sites, so that a design brief can be created for such schemes.

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Q14: Do you agree that there is demand for more small scale office space, especially in the town centre?

The need for employment spaces and sizes needs to reflect market demand which has to be defined via an up to date employment land supply assessment. This does not appear to exist according to the evidence base available. I suspect that there is demand for higher quality office space within the Town Centre, but this needs to be based on fact.

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Q15: Do you think that dated, low value office stock in the town centre is oversupplied?

From local knowledge, this statement is likely to be correct. However, an assessment of employment land and premises would assist in determining this more precisely than hearsay.

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Q16: 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?

The Local Plan should be planning to meet the identified needs for employment space within the area in a flexible manner. If there is no requirement then the use of existing medium and large office allocations should be reconsidered. It needs to be based upon a robust evidence base though.

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Q17: 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?

12 months is considered to be sufficient.

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Q18: Do you agree that we should allow more flexibility in some smaller centres for other uses to be introduced?

No response.

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Q19: 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 response.

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Q20: Do you think that within the town centre, some of the medium and larger sized office allocations are oversupplied?

There is potential that this is the case. However, a robust evidence base needs to be established to enable an appropriate plan to then be generated to meet the needs of the Borough over the plan period.

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Q21: Are there any other Development Management policies that you think should be included in the Northampton Local Plan (Part 2)?

The blunt tool that is CIL needs to be looked at carefully. Not all sites are the same and thus applying a baseline requirement has the potential to stifle development. This is particularly true for more central brownfield sites where remediation costs can be high. A reduction in CIL rates for such sites would reduce the potential for them stagnating.

This has been an issue previously in Northampton, and there is no reason to suggest that it will not persist. Reference is made in particular to the scheme at Freeschool Street (reference WN/2006/33 & 0034) where a resolution to approval never occurred as the Section 106 could not be agreed. A policy dealing with CIL appropriately should be included.

PAGE 21: Consultation On The Sustainability Appraisal of the Options Consultation Paper

Q22: 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).

Page 14 – Sustainability Appraisal Objective 10: Protect and enhance the quality and character of Northampton's landscape and townscape.

- Protect and improve Northampton's open and green spaces?

Comment: This is an ambiguous definition of green and open space. Importance should be placed upon Strategic Green Infrastructure and areas of landscape and biodiversity value. The quality and function of green spaces needs to be captured within any objective to strengthen this objective and its function, rather than seeking to protect all green spaces simply because they are verdant.
