

Appendix 2

Northampton Local Plan (Part 2)

Summary of Responses to Options Consultation

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1 INTRODUCTION

1.1 Northampton Borough Council (NBC) is preparing a new Local Plan for the administrative boundary of Northampton, following the adoption of the West Northamptonshire Joint Core Strategy - Local Plan (Part 1) in December 2014. Once adopted, the Northampton Local Plan (Part 2) (referred to hereafter as the Local Plan) will be the starting point for determining planning applications, alongside the strategic policies contained in the West Northamptonshire Joint Core Strategy (JCS) and Government guidance including the National Planning Policy Framework (NPPF).

1.2 Northampton's Local Plan will:

- Provide local and detailed policies that are not already the subject of strategic policies contained in the JCS
- Review, update and include the policies contained in the Central Area Action Plan (CAAP) which was adopted in January 2013 and
- Replace the remaining Saved Policies currently contained in the Northampton Local Plan June 1997, which were not replaced by the JCS policies or the CAAP policies

1.3 The Local Plan will contain up-to-date development management and site specific policies to help determine planning applications. It will identify land for new development for the provision of housing, jobs, commercial and leisure uses and any other uses as well as seek the protection and/ or enhancements of the historic and natural environment. It will include a policies map which will demonstrate visually how these policies are to be applied.

2 WHAT WE HAVE DONE SO FAR

2.1 The Council is required to undertake consultation at key stages of the plan preparation process. In undertaking the consultation exercise, the Council complied with the requirements contained in the adopted Statement of Community Involvement as well as the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

2.2 The first stage of public consultation was undertaken on the Scope and Issues of the Northampton Local Plan Part 2 between 27 April and 10 June 2016. Details of the consultation exercise, the consultation documents and the responses received are available on the website, by accessing the link below:

<http://www.northampton.gov.uk/info/200205/planning-for-the-future/2267/northampton-local-plan-part-2-issues-consultation>

3 CONSULTATION ON THE NORTHAMPTON LOCAL PLAN (PART 2) - OPTIONS

3.1 At the Borough Council's Cabinet on the 7 September 2016, it was agreed that an Options consultation stage be held for six weeks. The Options consultation is the second formal stage of the plan preparation process. It focused in more detail on some of the key issues and challenges in preparing the Northampton Local Plan (Part 2). Representations were invited on the proposed strategy for the Plan.

3.2 The following documents were published as part of the Options stage consultation:

- **Options Consultation Paper** – this paper sets out the Council's strategy for the new Local Plan (Part 2) including a vision for Northampton for 2029, the objectives which the new Local Plan will be seeking to achieve and the strategy that will underpin future development and regeneration activity across the Borough. Key points identified in the proposed strategy include providing for significant new growth in the most sustainable way, ensuring that the development of new homes is matched by the provision of opportunities for new employment, accessible local services and a high quality environment. In addition, it is proposing to support the timely delivery of the key infrastructure schemes that are critical to enabling the identified growth to take place
- **Sustainability Appraisal Options Report** – this considers the likely significant effects that the Local Plan may have on various environmental, economic and social factors. If the Local Plan is likely to have a significant effect on the environment, the sustainability appraisal must also meet the legal requirements of the European Directive on Strategic Environmental Assessment (SEA)

3.3 The consultation period began on Wednesday 21 September and ended at 5pm on Wednesday the 2 November 2016.

3.4 The consultation comprised the following activities:

Statutory consultees: letters and email notifications explaining the Options consultation and providing details on how to respond were sent to all statutory consultees as listed in the Town and Country Planning (Local Planning)(England) Regulations 2012 including specific consultation bodies¹, the general consultation bodies², neighbouring authorities and prescribed bodies³

¹ The specific consultation bodies are listed in Regulation 2 of the Town and Country Planning (Local Planning)(England) Regulations 2012 and relate to organisations responsible for services and utilities and infrastructure provision.

² The general consultation bodies are also specified in Regulation 2 of the 2012 Regulations and comprise: voluntary bodies some or all of whose activities benefit any part of the local planning authority's area, bodies which represent the interests of:

- Different racial, ethnic or national groups in the local planning authority's area

Non-statutory consultees: letters and email notifications were sent to non-statutory consultees on the Borough Council's Local Plan database including other organisations and individuals who have responded to the Issues consultation

Website: all Options consultation documents were made available for viewing and for downloading on the Council's website. An on-line response facility was also available

Inspection locations: all Options consultation documents were made available at the Inspection locations (the One Stop Shop at the Guildhall and all libraries in Northampton Borough)

Consultation leaflets: leaflets were distributed to all Borough Councillors, libraries in Northampton Borough, Parish Councils and Neighbourhood Forums in Northampton Borough, and all community centres in Northampton Borough

Consultation banners: banners advertising the Options consultation were placed at the One Stop Shop at the Guildhall, Kingsthorpe Library, Weston Favell Library, Wootton Community Centre and Duston Community Centre throughout the six weeks consultation period. In addition, a set of all the consultation documents and leaflets were also available for reference at these locations

Newsletter: local plan newsletter was prepared for all Borough Councillors to provide them with briefing on the Options consultation including an overview of the content, consultation actions and timetable

Paper copies: these were made available on request

Social media: the Options stage consultation was publicised on the Council's Facebook page and Twitter feed

Press releases: there were two press releases, one prior to Cabinet (before 7 September 2016) and one prior to the start of consultation (before 21 September)

Workshop for Parish Councils and Neighbourhood Forums: a workshop was held on 17 October 2016 for all Parish Councils and Neighbourhood Forums in Northampton Borough to receive an update on the Local Plan preparation process and a briefing on the Options stage consultation

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- Different religious groups in the local planning authority's area
 - Disabled people in the local planning authority's area
 - Persons carrying on business in the local planning authority's area

³ The prescribed bodies are specified in Regulation 4 of the 2012 Regulations (as amended) and in the case of Northampton are: Environment Agency, Historic England, Civil Aviation Authority, Homes and Communities Agency, NHS, Office of Rail Regulation, Highways England, Northamptonshire County Council Highways, South East Midlands Local Enterprise Partnership, Northamptonshire Local Nature Partnership

Drop in session: on the afternoon of 13 October 2016, the Planning Policy team were available at the One Stop Shop at the Guildhall to answer questions about the Options consultation

Workshop with Development Management: a workshop was held on the 27 October 2016 with Officers from the Northampton Borough Council Development Management section to discuss the local plan options

Meetings with stakeholders: Officers continue to meet and engage with partners from the local community including charity and professional organisations

3.5 Comments were invited electronically, by email and through Survey Monkey (the Council's corporate online response system) or by post. For those who do not have access to a computer, and were unable to visit any of the inspection locations, paper copies were made available if people phoned in or wrote to the Planning Policy team. All the documents were also available in other languages and formats on request.

4 RESPONSES TO THE CONSULTATION QUESTIONS

4.1 A total of 46 respondents commented on the Options consultation paper:

- Website: 15 responses were received online through Survey Monkey
- Email: 28 responses were received by email
- Post: 3 responses were received by post

4.2 4 responses were received after the consultation deadline which mean they were not duly made. Their responses have been included in this summary but clearly marked as not duly made.

4.3 A list of respondents is included as Appendix 1 to this report.

4.4 It should be noted that there were:

- 356 recorded visits to the website
- 1,094 people received the information via Twitter
- No information available relating to Facebook

5 THE NEXT STAGE

5.1 The outcome of this Options consultation and further work, along with previous work and comments made during previous Local Plan consultations, will inform the preparation of the Draft Northampton Local Plan. All responses received will be considered when preparing the next stage of the Local Plan and will be published on the Council's consultation portal in accordance with the Data Protection Act.

6 SUMMARY OF RESPONSES RECEIVED TO THE NORTHAMPTON LOCAL PLAN (PART 2) OPTIONS CONSULTATION PAPER

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

Overview: Summary of Responses

22 respondents made comments to this question, one of which was not duly made. 5 respondents were openly supportive of the vision with one stating it is to be applauded but adding “it is the delivery we must concentrate on”.

This question generated a mixed response which can be broadly divided between observations on the plan making process, housing, heritage, transport, and open space, sport, recreation, health and well-being. It is fair to say that whilst the responses will be summarised below as responses to the question on the Plan ‘vision’ some are clearly not specifically ‘vision’ related. Instead they over-spill into more general thoughts on the relative topic areas in the respondent’s reflections.

Plan Making

Two respondents made specific reference to the plan making process. One expressed concern that the proposed plan period was potentially falling short of the National Planning Policy Framework (NPPF) which states that Local Plans should be drawn up over an appropriate time scale, “preferably a 15-year time horizon”. The respondent noted that if the Plan was to be adopted in 2018 it would actually need to cover the period up to 2034. Another respondent was doubtful about the ability of Northampton Borough to accommodate all its housing requirements up to 2029. This, they continued, meant effective ‘duty to cooperate’ would be critical to look at and reach agreement on how any unmet need can be accommodated most sustainably.

Housing

Three respondents made reference to housing. One noted that the vision in ‘draft plan’ should make reference of the need to deliver the housing and economic growth set out by the adopted West Northamptonshire Joint Core Strategy. Another wanted to emphasise support to the part of the document which states: to “provide a balanced range of high quality housing to meet different housing needs”. The third thought the vision could be improved by reference to meeting local residents’ aspirations, as well as their needs, for example: ‘By 2029 Northampton will provide a balanced range of high quality housing to meet different housing needs and aspirations and offer an excellent quality of life for its communities.’

Heritage

Three respondents made reference to issues of heritage. One welcomed the reference to high quality design choices and distinctive historic character. The other

two looked at strengthening the vision. One noted that it only made a glancing reference to the role of town history and that a better statement would be “a place where history and innovation co-exist”. The other wanted to see specific reference within the vision to ‘heritage assets, both designated and non-designated’ to ensure a sound Plan in accordance with the NPPF.

Transport

Five respondents made reference to transport issues, all expressing concern. 2 mentioned a lack of reference to public transport with one expanding on this by expressing surprise that there was no specific section relating to Traffic and Transport planning. Traffic congestion and air quality is a concern. The northern relief road is long overdue but it will only be a temporary solution given the anticipated growth. Given the more radical transport solutions being looked at in towns like Nottingham, Leeds and Bristol it seems remiss that transport is not given a more substantial section of the Plan. Two further respondents articulated their disappointment that infrastructure does not appear a prime concern making particular reference to the need for new roads. The last voiced concern over longer-term growth options for Northampton and the impact that might have on North Northamptonshire particularly with respect to limited capacity of the transport infrastructure to the east of the town and possible coalescence.

Open Space, Sport, Recreation, Health and Well-being

Three respondents made reference to the issues of open space, sport, recreation, health and well-being. One said the vision should reference sport and active recreation as a contributor to health. Another wanted the vision to incorporate a more explicit reference to health and wellbeing. The last respondent was very concerned about the proposal to utilise open space for housing if it is of 'limited value', 'underused' or 'no longer serves its designated purpose'. They continued that without any indication on how this would be assessed the notion was very dangerous and the proposal should be removed.

No Category

The final three responses were stand alone. The first believed that the vision was missing a reference for community provision. The second queried why the vision would make reference to the “Saints” but not the “Cobblers”. The third (not duly made) was of the view that too many political overtones/restrictions were being applied by local career politicians with very little knowledge of business. They went on to say that local business people should be consulted more on how to create the right environment for business start-ups.

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

Overview: Summary of responses

23 respondents made comments on this question, one of which was not duly made. Those providing specific support to the objectives as they stand are set out in the table below. Some objectives received more support than others. The numbered columns in the table below represent the 12 objectives that were consulted upon, with each 'x' representing specific support.

Table of responses endorsing objectives

1	2	3	4	5	6	7	8	9	10	11	12
x	x			x	x			x	x	x	
							x	x			
x	x	x	x	x	x	x	x	x	x	x	x
	x								x		
x	x										
	x										
				x							
				x							

Overall the question generated a mixed response which can be broadly divided between observations on plan making, and the objective categories of connections, economic advantage, educational attainment, housing, heritage and climate change. It is fair to say that whilst the responses will be summarised below as responses to the question on the Plan 'objectives' some are clearly not specifically 'objective' related. Instead they over-spill into more general thoughts on the relative topic areas in the respondent's reflections.

Plan Development

Three respondents commented on issues of plan development. The first stated that the Borough will struggle to meet employment needs within its own boundary. Therefore the duty to cooperate should be embraced by the Council and adjacent authorities to provide for any unmet needs as close to the Borough boundary as possible. Another was of the view that fewer objectives more firmly entrenched in the Northampton experience would give more resonance with local people and make the Plan more capable of being delivered. Lastly one respondent noted that there is a gap between the policies that underpin the planning process and the management of delivering the [Plan] vision

Objective 1 - Connections

Three respondents made reference to travel and transport. One thought the objective could be made firmer by stating which sustainable transport modes are most appropriate for Northampton. They went on to note that reference to rural areas should be removed from the sentence. The other two considered sustainable transport with the first stating that Northampton needs a bus station 3 times of the existing provision. The second specified the need for much improved and more

clearly defined links between the centre of town (primarily an improved bus station) and the rail station and the General Hospital. The respondent went on to highlight that because of the length of time and unreliability of bus travel and the expense of parking at the train station they would generally prefer to travel by car

Objective 3 – Economic Advantage

There were three comments relating to this objective. One respondent said there needed to be provision of affordable business premises for local business especially start-ups. The other made two points; firstly they expressed concern at the suggestion that employment land might be lost to housing. If this should be the case, then opportunity to expand existing, successful employment sites should be capitalised on. They continued by noting that the Local Plan Part 2 should incorporate flexible policies which will help encourage potential investors and developers seeking to progress employment development in Northampton

Objective 5 – Educational Attainment

Two respondents made comments with regard to education. The first noted how important it is for NBC to maintain a commitment to employment, training and education by using structured interventions that are already in place. They went on to advocate the inclusion of such interventions within the Local Plan. This approach would support Objective 5. The other noted that there is no specific support within the Plan, as yet, for new development associated with the expansion of educational institutions and establishments. Enabling educational institutions to grow and expand the range of opportunities is a key objective.

Objective 6 - Housing

There were seven observations relating to housing. 2 were of the view that delivering the SUEs within the NRDA would assist in meeting the objectives. One went on to state that Objective 6 should make a direct reference to delivering the SUEs. Another respondent thought the objective should be amended to make reference to meeting not only residents' needs, but also their aspirations. This they suggested would support the delivery of the vision, and set a clear message to developers that housing needs to achieve more than the bare minimum needs. Another respondent was keen to get more people living in the town centre to energise it. They went on to suggest that there are plenty of existing buildings that could be renovated to provide additional homes. Lastly, one respondent made reference to a potential brownfield site in Kingsthorpe Hollow that they believed would be more suitable for housing than its existing sui-generis use for scaffolding, skips and waste disposal.

Objective 8 - Heritage

Two respondents drew reference to Heritage. The first believed that the Borough should have a Heritage Plan to inform the development of policies in the Local Plan. They went on to spell out how economic prosperity and social cohesion benefit from a strong sense of local identity and pride built around the history of the area. The other respondent suggested that the wording for objective 8 could be strengthened to "the Borough's cultural heritage, including Conservation Areas, listed buildings and archaeology will be protected and enhanced".

Objective 10 – Climate Change

Two respondents made suggestions with regard to Objective 10. The first wanted to see another bullet added that would explicitly support the climate change measures set out in the draft Northampton Low Emissions Strategy. The second respondent thought the objective should include reference to 'securing tighter water efficiency requirements', a change that help align the objective with the National Planning Practice Guidance

Open Space, Sport, Recreation, Health and Well-being

Three people made reference to open space, sport, recreation, health and well-being. One was disappointed there was no reference to sport, leisure and active recreational facilities apart from town centre provision and no reference to protect and enhance existing and or create new provision right type / right place. Another stated there should be an objective to provide suitable play space and accessible community space within the town centre. The third respondent highlighted the health and wellbeing challenges faced by Northampton and the issues around health services. Given these concerns they believed a more explicit health and wellbeing objective should be included.

Neighbourhood Planning

One respondent commented that it would be helpful to see the aspiration of the Spring Boroughs Neighbourhood Plan reflected in the new Local Plan (Part 2) and made specific reference to the Neighbourhood Plan proposal for an urban park in the area.

General Observation

One respondent (not duly made) was of the view that the local electorate should have more say on decisions currently made by Guildhall committees. They suggested a focus on employing local, small scale construction industries in the first instance. They concluded that mixed use development of hi-tech business alongside housing and with parking would solve a number of issues

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

Question 3 – Overview: Summary of Responses

There were 21 responses to this question, of which one was not duly made. 13 of the respondents agreed to the 20% buffer, one respondent didn't agree and 7 of the respondents either had no opinion/undecided, suggested alternative approaches or had different opinions.

9 respondents stated that NBC had persistent under delivery of housing, therefore a 20% buffer should be applied as set out under the NPPF. 7 of the respondents pointed out that NBC's persistent under delivery of housing has been defined in a recent appeal decision (ref:APPN2825/W/14/2228866, application for Northampton South of Brackmills SUE).

One respondent pointed out that although NBC confirmed that the Council could demonstrate 'no more than 3.76 years supply' in relation to the Secretary of State's appeal decision on Northampton South SUE, the figure was based on a 5% buffer. If a 20% buffer was applied, the Council's land supply would drop to 3.29 years.

One respondent stated that 'Northampton Related Development Area 5 Year Housing Land Supply Assessment April 2016' applies a 20% buffer to the initial housing requirement and the report confirms that the Council is working on the basis that allocated SUEs within the NRDA contribute towards Northampton's housing growth and are thus included within the Borough's 5 year land supply calculations. The respondent suggested that it is necessary to provide clarification on the future of the NRDA and monitoring arrangements (i.e. all development within the NRDA is assigned to Northampton's supply figures) to ensure that there is clarity for all moving forward. This respondent mentioned that his/her clients are proposing to develop at one of the allocated SUE sites and the capacity of the part of the site is due to be tested prior to submission of a planning application. It was suggested that NBC should acknowledge and increase the quantum of housing to be delivered at his/her client's site as the plan making process continues.

2 respondents suggested that the shortfall should be addressed utilising the Sedgefield method.

One respondent stated that 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. This respondent also expressed support for the identification of broad areas where medium-scale development would be supported in principle. This approach would offer additional clarity and help to direct development to the most sustainable locations. The respondent's development site was promoted.

One respondent supported the recommendation that priority should be given to sites which can be delivered in the short term. However, the respondent was uncertain as to what is meant by prioritising as this is not explained in any detail in the options consultation document.

One respondent stated that the buffer should be provided on brownfield sites only in order to keep development on greenfield as minimum as possible, because open spaces are critical to human wellbeing. The respondent also sought clarification on what this buffer means.

One respondent stated that NBC should also consider building in flexibility in terms of the overall provision to ensure that housing requirements are delivered in the plan period. It was suggested that NBC should adopt the approach to ensure a more effective supply of housing land for the medium to long term rather than just for 5 years, by providing additional flexibility over and above the identified objectively

assessed housing need, along with provision for developable reserve sites equivalent to 20% of a Council's housing requirement.

One respondent suggested that NBC needs to adopt a strategy which seeks to maximise residential development and also needs to be afforded to the overall housing figure for the Borough. The 18,870 should be a minimum target and should not be a cap on development. Also, the emerging Local Plan Part 2 should provide a strategy for delivering housing beyond 2029. The current target is to adopt the Local Plan Part in 2018. This means there will only be 11 years of the plan period left. The Local Part 2 Plan should consider a period beyond 2029 and contain a strategy to meet a revised housing target which is based on robust evidence contained in an up to date objective assessment of need through a revised Strategic Housing Market Assessment.

One respondent stated that dwellings should not be located too close to key transport corridors as the populations residing there will be exposed to poor air quality issues.

One respondent suggested removing the word “also” from ‘The Strategy’ on page 8 to instead read “The historic environment will be central to shaping the Borough’s future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places.” The respondent also suggested making reference to heritage assets in order to strengthen ‘providing new homes’.

One respondent who did not agree with a 20% buffer stated that the appeal decision referred to is based on a ‘growth figure’ from the time when Northampton was part of the Milton Keynes and South Midlands Growth Area prior to 2011 which is not an objectively assessed housing need requirement. Therefore the assessment against this requirement is not appropriate. It was suggested that NBC should focus on the period from 2011 in making its decision, when there was an objectively assessed housing requirement in place against the level of supply of sites in the Borough. This respondent also stated that NBC should take into account the level of supply of sites in the Borough, because the current shortfall appears to not be a lack of sites, but less than optimum delivery of the sites which are available. The respondent expressed concern that by increasing the supply of sites, there would be more harm than benefits. This is because the supply of sites can dissipate. The respondent suggested that NBC should be more transparent about its supply of sites and be clear about what can be done to ensure that they come forward for development.

The same respondent referred to an appeal case in East Northamptonshire, where the appellant argued for a 20% buffer, citing a persistent under delivery of housing by the local planning authority. The Inspector did not agree with the appellant. The Inspector did not consider that the under performance in the intervening period could be solely attributed to under-delivery by the Council, and had more to do with the economic recession. Over the past 15 years, the Council demonstrated a commitment to achieving high levels of completions in the first 7 years and again in the past 2 years. The respondent concluded that 20% is not therefore 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.

One respondent (not duly made) stated that the existing vacant properties in town should be brought back into use first. Brownfield sites should be built over for 1 and 2 bedroom flats to deal with the homeless crisis and real need for properties.

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?

Question 4 – Overview: Summary of Responses

There were 20 responses to this question, of which one was not duly made. 6 of the respondents agreed to the suggested residential density, 5 respondents stated that they didn't agree, 1 respondent had no comment and 8 of the respondents (including the one "not duly made") offered several comments.

A general comment made by 5 respondents was that regardless of whether they agree with the proposed residential density of 40, there is concern regarding lack of amenity and parking spaces within high density residential development. One of the respondents mentioned that all other policies should reflect the higher density, for instance the requirements for amenity space and parking. The respondent commented that high requirements for amenity space or parking provision are land hungry and will make achieving high density unviable.

6 respondents expressed their support for the proposed density but had the following conditions/ comments/ recommendations:

- The target of 40 dwellings per hectare is supported as long as all the other policies reflect this target. Each site should be judged on its own merits and densities should be a target as opposed to an absolute requirement
- Housing with this density should be for people with no children. High density housing with little or no provision for play and recreation can lead to higher than normal levels of antisocial behaviour as the children choose to play in inappropriate areas causing conflicts between neighbours
- As long as there is sufficient parking for all the cars
- Update the SHLAA, and explore all the reasonable options to provide land to accommodate new homes as well as employment and other uses to support growth
- Support a minimum density of 40 dwellings per hectare for the residential schemes within the Borough and higher density requirement near key centres or transport corridors but SUEs should achieve an average 40 -45 dwellings per hectare not 35dph in order to make the most efficient use of available land.

5 respondents disagreed with the proposed density of 40 dwellings per hectare and higher densities. 4 respondents regardless of whether they agree with the proposed density do not support setting up a blanket figure of density.

One respondent stated that each site should be assessed or carefully master planned, taking into account of elements such as character/architecture/ the type of housing to be provided and location to ensure that it responds sensitively to its surrounding context.

One respondent stated that there are numerous adverse effects associated with the imposition of an over prescriptive planning policy of this nature. It was agreed that a policy of this nature could potentially be welcomed for centrally located sites that can accommodate high density residential schemes. However, in those other locations outside of the Central Area, a more pragmatic and flexible approach is required to inform housing density. The imposition of a plan wide density policy has the potential to negatively affect the quality of future developments and will result in the disproportionate delivery of smaller sized dwellings which may not meet local housing needs. This respondent was also concerned as to whether the stated density requirement can actually be achieved when combined with the requirements of Technical Housing Standards and the recently adopted Northamptonshire Parking Standards. Such publications increase the development pressure. For instance, the County Council/s parking requirements have increased significantly which means that NBC will have to find additional land for housing due to the increased land requirements for parking. A prescriptive housing density policy would serve to overburden developers, add another barrier to housing growth and ultimately result in over developed sites. Officers were recommended to reconsider those policy provisions contained within the NPPF (particularly paras 47/ 59).

One respondent stated that each development should be judged on its own merits. Dwelling density may not always be the critical factor in determining the quantum of development. The respondent commented that in some urban areas and also around transport nodes, density could be in excess of 40 dwellings per hectare. However, in locations such as the rural-urban fringe, a lower density of around 30 dwellings per hectare would be more appropriate. This ensures that effective landscape buffers and other measures such as surface water attenuation can be incorporated.

3 respondents disagree with higher density, with 2 referring to 'key transport corridors' which can cause immediate traffic congestion and air pollution for those residents. It was pointed out that Northampton already has 7 Air Quality Management Areas with high levels of NO2 which are all located along key road links. One respondent mentioned that the town centre and Spring Boroughs should not have higher density as there was enough high density one bedroom accommodation in the area, and what was needed was more affordable family housing with gardens. It was also mentioned that high density development would lead to an increase in social deprivation/ exclusion/ cohesion and crime which does not help achieve some of the key objectives of the Local Plan.

One respondent stated that raising density levels needs to be carefully considered. This should only occur where it is realistic, otherwise it simply results in an under provision of residential allocations.

One respondent commented that densities change the characteristics of developments. There is greater scope to increase densities where smaller units such as 1 and 2 beds and flats are provided, typically in town centre locations and along key transport corridors. Elsewhere, raising the density simply results in the reduction of the sizes of both the public and private spaces, 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. If larger number of dwellings share private driveways, then less land than would be required from public highways. This means the density can be increased without the need to reduce the level of associated green space.

One respondent commented that it will depend upon demand for housing, size of dwellings and residential growth in the region.

One respondent accepted that maximising the number of dwellings on additional sites outside of the SUE's would help address the land supply issue but urged NBC to identify further sites for residential development to ensure that all new development is sustainably delivered to both meet current and future needs.

One respondent suggested removing the word "also" from 'The Strategy' on page 8 to instead read "The historic environment will be central to shaping the Borough's future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places." The respondent also suggested making reference to heritage assets in order to strengthen 'providing new homes'.

One respondent expressed surprise at the number of houses to be built on the Kingsthorpe middle school site. The respondent considered that having 190 houses on this site would result in high density and the comparison between this site and the adjacent area is extreme.

One respondent (not duly made) suggested that residential units should be built on brownfield sites in the town centre. This should be utilised/ built on before building on the outskirts and on already designated SUEs. Harpole/Kislingbury/Bugbrooke housing estates should not be progressed as they are being built on prime green belt (for farming purposes only).

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?

Question 5 – Overview: Summary of Responses

There were 20 responses to this question, of which one was not duly made. 10 of the respondents (including the one not duly made) agreed to the question, 5

respondents disagreed, 2 respondents had no comment and 3 of the respondents had their own opinions.

The general comment from those who agreed with the question is that priority should be given to sites which can be delivered in the short term in order to meet an immediate shortfall in requirement. There were some points raised by those respondents as follows:

- A focus should be given to smaller sites which fit logically alongside a larger development scheme already delivering dwellings and supported by existing infrastructure such as schools, doctors and local shops. Providing the infrastructure such as schools, doctors and local shops prior to the delivery of the housing is considered to be important. This would provide the Council with a higher level of delivery certainty, rather than relying on much larger schemes, such as SUEs, which will make their contribution to supply in the medium and longer term.
- One respondent suggested sites such as Buckton Fields at the Eastern Land Parcel should only be considered if it fits with the current housing demand in the region and does not compromise the quality and lifespan of the buildings. The respondent agreed with the question but was uncertain as to what is meant by prioritising
- Some respondents promoted their small sites for development which can be delivered in short term. One respondent stated that their client's sites are suitable for a range of housing options which would meet the needs of first time buyer's right through to those which are seeking more aspirational and executive style properties. It was stated that whilst it is accepted that it is the Local Authority's intention to maximise housing delivery within the Borough, this should not be at the cost of providing the range of properties required by the market
- One respondent (not duly made) stated that NBC should focus on brownfield sites within the town centre, for instance, vacant office units above current retail units could be used for 1 and 2 bedroom flats. Local building firms should be awarded specific contracts. NBC should concentrate on the existing built environment before building any more new housing on known Green Belt areas.

Those who disagreed with the question had a variety of reasons and comments as follows:

- It would compromise the quality of the development, for instance, loss of green belt, and also would leave brownfield sites in the town centre undeveloped, e.g. Chronicle & Echo, Greyfriars, which will be to the detriment of the Vision for a vibrant town centre
- 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 into the Plan period. It may be that larger strategic sites can provide houses in the short term and then through the plan period

- NBC is heavily reliant on its housing numbers being achieved through the SUEs which in reality are likely to be delivered later on in the plan period and beyond
- Whilst 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. The respondent's site is considered able to achieve wider contributions as well as delivering housing, such as softer landscaped edge and opportunities for planning and other measures to support the Nature Improvement Area (NIA) and Green Infrastructure networks.

Other respondents who disagreed/ had additional comments state the following:

- One respondent suggested removing the word “also” from ‘The Strategy’ on page 8 to read “The historic environment will be central to shaping the Borough’s future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places.” The respondent suggested making reference to heritage assets in order to strengthen ‘providing new homes’
- One respondent promoted a particular site for development and explained the reasons why the site is suitable for housing development, including its suitability for development in the short term
- One respondent had encouraged NBC 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 was pleased that NBC has now resolved to do so. It was advised that this is produced as quickly as possible and that it contains a series of robust actions to help bring forward supply

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

Question 6 – Overview: Summary of Responses

There were 19 responses to this question, of which one was not duly made. This question generated a mixed response:

- 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. Proactive and forceful chasing of third party consultees is also important to reducing the time applications are delayed in the planning system. 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.

- The Local Plan Part 2 must identify a range of sites, both within and adjoining the Borough boundary that are capable of being delivered in the shorter term. Clear guidance on infrastructure requirements as part of the plan is very welcomed as this would help minimise the requirement for negotiations with partners, such as Northamptonshire County Council, in respect of highway improvements and education provision
- The Council has proposed that sites which are deliverable within 5 years should be prioritised as part of the Part 2 Local Plan. For all sites it would be helpful to consider to what extent new and improved water and wastewater infrastructure will be required and whether this will require the allocated site(s) to be phased.
- The Options Consultation Document states that there is likely to be a shortfall of land to accommodate dwellings to meet identified future needs. The consequences of this are being addressed through proactive working with neighbouring authorities to try to share some of the housing delivery. The respondent looks forward to seeing how this will be reflected in the emerging Part 2 Plans for Daventry and South Northamptonshire
- NBC should actively engage with developers and landowners of identified sites and work with partners to understand potential issues and barriers to sites coming forward and to find jointly agreed solutions
- Allocation of sites through the plan process should be accelerated. Those sites which are genuinely deliverable in the shorter term should be given priority, and should be driven by the Council
- The Local Plan must identify a range of smaller sites within the Borough to deliver dwellings in the shorter term, to include sites which would have a lesser impact on infrastructure requirements, or sites which are already linked to wider infrastructure improvements. Those sites which are identified through the Plan should be considered as acceptable in principle, and treated as such through the determination process.
- Release of corporate land banks to allow for social housing
- The 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. The respondent's client's site has been available for development for many years but has had to be put on hold pending a new local plan. This is a clear indication that there needs to be a fresh approach to development opportunities
- Government funding for social housing is needed
- Empty office blocks can be converted to apartments, and these are often near town centres eliminating the need for car ownership or car use.
- Clear appraisal of the infrastructure and services needed for each site be identified and written up long before development takes place
- There should be flexibility in the application of policy requirements relating to the provision of affordable housing. In addition, flexibility should be applied to requirements to meet housing standards beyond building regulations in the short term to encourage delivery

One respondent suggested 3 points:

- A discount on the Community Infrastructure Levy
- Production of realistic development briefs on key sites
- Self-build allocations where infrastructure is provided up front

One respondent commented that some particular types of property (e.g. timber framed) are quicker to build than traditional houses. Other types of innovative housing (pods) are being developed and further investigation is required. The type of housing to be built may be restricted by particular skills shortages within the construction industry which could also have an impact on labour build costs. The respondent's client's developments are delivered through private funding, without the need for grant funding. The delivery of these homes within mixed tenure schemes can significantly improve deliverability and viability, with the added benefit of speeding up delivery as the model can be quickly occupied without the need to wait for external funding. To speed up housing delivery, it was recommended that the Plan recognises the benefits of this model and include clear reference to the tenure in its housing policies.

One respondent suggested removing the word "also" from 'The Strategy' on page 8 to instead read "The historic environment will also be central to shaping the Borough's future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places." The respondent also suggested making reference to heritage assets in order to strengthen 'providing new homes'.

One respondent (not duly made) stated that a born and bred Northamptonian should be employed as a Senior Project Officer at NBC to take charge for specific new builds on brown field sites first of all. The designated SUEs on the outskirts of town i.e. Hardingstone, Moulton, Collingtree, Upton and Harpole should be cancelled and ignored until brown Town Centre re/developments have been completed. For lower costs, use local builders first. Build upwards not outwards. The respondent commented that University of Northampton sites should be kept as an academic institution in order to supply graduates for developing the local economy on a much greater scale.

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

Question 7 – Overview: Summary of Responses

There were 16 responses for this question, of which one was not duly made. 8 of the respondents agreed with the question, 2 of the respondents disagreed, 1 respondent had no comment and 5 of the respondents including the one not duly made had their own opinion.

Those who agreed with the question mentioned the following:

- Considering the high demand for land, housing will probably not be provided if the issue was not being addressed by a policy specialist
- If a developer proposes specialist housing in another location and this proposal is approved, an identified site could be released
- The site for specialist housing should be identified for the types of housing where there is need evidenced and supported by the Council's SHMA (this is mentioned by 2 respondents). This includes the provision of a mix of housing for "different groups in the community". The West Northamptonshire Joint Core Strategy also identifies the need for all forms of housing to be provided for
- Agree. However, 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
- Housing provision for the elderly is important. The provision of secure specialist developments such as the 'extracare' village addresses the 'fear of crime' for many older people. Such development should have elements contained within it which allows use by other members of society so that the development is busy and vibrant but controlled
- Whilst positively prepared policies in respect of specialist housing and the provision of housing for older people will go some distance in addressing those needs it is considered that such development could be assimilated into all proposed residential sites. However, as is the case with affordable housing, the respondent is aware of the management issues that arise from a 'pepper pot' approach to such developments
- In the majority of cases, specialist needs are better met through those sites which are more centrally located or on those sites which offer residents high accessibility to shops, services, facilities and public transport. It is considered that as a consequence of allocating currently suitable residential sites to meet particular housing needs, the Council will have to identify further land to meet more general housing needs
- Any proposed housing policies, for specialist properties or otherwise, should allow for the delivery of suitably flexible developments which are both sustainable and responsive to changing circumstances and individual needs over the life of the plan

Two of the respondents who disagreed with the question gave the following reasons and suggestions:

- Supportive policies for specialist housing are okay 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
- Specialist housing causes 'ghettos'

Those who did not specify whether they agree with the question or not expressed their concerns and suggestions as follows:

- 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 the provision of sufficient land for housing purposes, including reserved sites. so that land values are more realistic and delivery more consistent

One respondent expressed disappointment that the section on housing provision makes no mention of Provision for Gypsies and Travellers. The respondent questioned the meaning of specialist housing.

One respondent suggested removing the word “also” from ‘The Strategy’ on page 8 to instead read “The historic environment will also be central to shaping the Borough’s future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places.” The respondent also suggested making reference to heritage assets in order to strengthen ‘providing new homes’.

One respondent (not duly made) recommended that the discontinued middle school sites be converted into 1 and 2 bedroom flats and major allotments. The respondent also referred to an Estate Leader role for growing on non-allotment sites within housing estates.

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

Question 8 – Overview: Summary of Responses

There were 16 responses for this question, of which one was not duly made. 7 of the respondents agreed with the question, 3 of the respondents disagreed, 1 respondent had no comment and 5 of the respondents including the one not duly made had their own opinion.

The comments include:

- No, it is a better community that integrates all ages
- No, a community needs housing to be all ages so that it can be a 'community'
- Yes. Needs to be affordable
- "Pensioner only Villages" should be built within known existing housing estates and should not attract criminality, i.e. St James Lewis Court area. "Retirement Areas" should include access to allotments, to deal with increased levels of physical activity and to tutor youngsters in self- sufficiency. These pensioner only villages and retirement areas should be situated near Academies (not duly made).

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

Question 9 – Overview: Summary of Responses

There were 18 responses to this question, of which one was not duly made. This generated a mixed response, with 7 respondents saying yes (including one not duly made), 3 respondents saying no and the others had either no comment or gave mixed opinions and alternative suggestions.

The respondents who said yes also mentioned:

- Must provide for the makeup of the UK population
- There are too many four/five bedroomed houses with too little provision for parking
- Yes to apartments
- Not all concentrated in the town centre

Many respondents who did not say yes to this question mentioned that the housing mix should be informed/ identified by the most up to date evidence on housing need such as Strategic Housing Market Assessment. Some also suggested letting the market decide, for instance house builders, because they respond to market forces and build the houses most desired in order to maximise values. The alternative approach suggested is 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. The housing needs assessment then should be periodically updated (one respondent suggested every 2 years) over the life of the plan.

Some respondents stated their concerns that the imposition of rigid expectations of house types and sizes on site allocations has the potential to be counterproductive. For instance, the changes to the Permitted Development Regulations in 2014 and April 2016 contributed to reducing the pressure on allocated sites to deliver smaller properties. Therefore it is urged that any policy carefully considers and accounts for the level of need for such dwellings to make sure that there is not an over-supply of 1 and 2 bed properties.

One respondent added that the Council also needs to consider the whole range of housing needs present within the Borough including those executive and aspirational needs which sit at the other end of the spectrum.

One respondent mentioned that 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.

One respondent commented on affordable housing. 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.

One respondent expressed disappointment that the section on housing provision makes no mention of Provision for Gypsies and Travellers.

One respondent (not duly made) considered that specific allocation have to be made for 1 and 2 bed flat units within the town centre in order to increase housing density but with no car parking allowed. Local industry has to be within walking distance such as Victorian era shoe factories and workers housing. It was mentioned that several already exist but NBC has not considered them. This respondent suggested bringing back empty office units in St Michaels Road into use by entrepreneurial architects.

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

Question 10 – Overview: Summary of Responses

There were 15 responses to this question, of which one was not duly made. 4 of the respondents agreed with the question, 1 respondent disagreed, 2 of the respondents had either no comment or no opinion and 8 gave mixed opinions and alternative suggestions (including not duly made).

One respondent who said yes to the question mentioned that it should be done through partnering with organisations such as Habitat for Humanity GB Homes which would enable local people to take some control of Housing Need.

One respondent stated that 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 of 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).

3 respondents (regardless of whether they agree with the question or not) commented that any policy of this type should be evidenced and supported by the Council's Strategic Housing Market Assessment. One said that it would not be an efficient use of resources to provide such plots without specific evidence and market demand to do so.

One respondent stated that it is potentially dependant on the skills in the region to undertake this type of development.

One respondent referred to the comment made by the Home Builders Federation (HBF) over such threshold policies for other Local Plans consultations. Their concern was that such an approach provides no additionality to land supply but rather changes production from one type of builder to another. It was also noted that there are practical problems associated with implementing a restrictive/threshold policy including health and safety implications, working hours and length of build programmes. It was mentioned that one of the Inspector's reports expressed reservations about the implementation difficulties associated with threshold approach. It is more appropriate to identify specific sites appropriate for self build/custom build rather than seek a proportion of units on sites to be available for self build/custom build.

Another respondent also referred to implementation difficulties. It was stated that if a threshold is proposed in the same way as affordable housing, 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.

One respondent suggested removing the word "also" from 'The Strategy' on page 8 to instead read "The historic environment will be central to shaping the Borough's future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places." The respondent also suggested making reference to heritage assets in order to strengthen 'providing new homes'.

One respondent (not duly made) stated that the threshold can be applied only for specific "Eco Friendly Builds" on edges of town. Other suggestions include:

- high density flats in current, existing Victorian era estates in the town centre
- no building within known SUE sites as they are currently "unfit for purpose" i.e.flood sites and SSSI positions
- modified large static caravans which can be initiated into other County based "caravan sites" i.e. Wilby, Blisworth, Cosgrove and Billing Aquadrome built by the Earls Barton Caravan firm - local builder gets the business.

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

Question 11 – Overview: Summary of Responses

There were 11 responses to this question, of which one was not duly made. This generated a mixed response, with some respondents saying that there is no demand for small scale offices and others saying that there is, particularly from SMEs. There is consensus that with flexible working conditions and online businesses, the need for employment spaces and sizes needs to reflect demand. Another comment was that underused or vacant properties in the town centre could be refurbished for office

use if there is evidence of demand. One comment highlighted the importance of an up-to-date evidence base to address this question.

One respondent (not duly made) considered that start-up businesses, particularly in the information technology/ creative arts/ media, should be given more assistance including potentially reducing business rates. Also, the respondent suggested using compulsory purchase orders to purchase properties to help these businesses set up their operations under the right terms. The respondent added that all start-ups will need serious help from NEP/ SEMLEP/ Town Centre BID.

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

Question 12 – Overview: Summary of Responses

11 respondents responded to this question, of which one was not duly made. Most agreed that dated, low value office stock in the town centre is oversupplied and one commented that there are prime examples available of such units, including Belgrave House. Further emphasis was placed on providing an updated evidence base to support investors in Northampton, who are looking to redevelop brownfield land and better utilise vacant office for alternative uses, and to support those looking for the right format of office accommodation.

One respondent (not duly made) was concerned that conversion costs would put people off, particularly from the IT/ creative arts/ media start-ups. It was recommended that the office units be updated with modern technology and aimed primarily at high tech and creative arts occupancy. The respondent also considered that apprentices should be taken on by all new businesses.

Question 13: Do you agree that outside of 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 13 – Overview: Summary of Responses

There were 11 responses to this question, of which one was not duly made. 4 of the respondents agreed 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, with one specifying that this should be the case if there is demand in place. At least 2 respondents state that these should be refurbished to provide living accommodation. Another stated that conflicts of use should be avoided. One respondent mentioned that the Local Plan should be planning to meet the identified needs for employment space in a flexible manner and emphasised the need for a robust evidence base. Another respondent (not duly

made) stated that there are enough empty offices in the town centre and the Lakes, and that no new buildings should be developed until the existing buildings are fully utilised. The same respondent commented that high business rates are putting off start-ups.

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?

Question 14 – Overview: Summary of Responses

There were 15 respondents to this question, of which one was not duly made. 6 of the respondents agree that 12 months should be sufficient for active marketing to be undertaken. At least 3 respondents did not consider the timescale to be relevant because of a variety of reasons including:

- a fluctuating market (whatever pertains today may not be so in 12 – 24 months)
- each case needs to be considered on its merit and the community should be involved in deciding how long the marketing should be and
- placing a long time limit for marketing is considered to be an inefficient use of land given the conflicting pressures and limited land availability

Another respondent considers marketing to be a waste of money. One respondent considers 3 months as a maximum would be an appropriate timescale although this itself could be onerous, depending on the operating conditions for many businesses.

One respondent (not duly made) commented that the marketing exercise should begin with the “date of leaving”. The respondent also stated that the marketing team should concentrate on creating businesses within academies and getting the under 25s involved in apprenticeships. In addition, private sector standards should be applied throughout the town.

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

Question 15 – Overview: Summary of Responses

There were 13 responses to this question, with one not duly made. 9 respondents agree that more flexibility should be allowed in some smaller centres. One commented that this was necessary to ensure that the centres remain viable. Another highlighted the need for childcare provision including day nurseries and pre-schools as some of the uses which should be allowed in these centres. One respondent did not want the introduction of industrial uses in these centres and

sought careful consideration to be given to retail use (for example, fish and chips shop).

One respondent wanted an explanatory text to be written for heritage assets. The respondent added that they form a vital and central role within town centres and allowing more flexibility could be a sustainable method for the continued use of smaller centres. The proviso is that in allowing this flexibility, it should still conserve and enhance heritage assets and their settings.

One respondent referred to multi purpose/ multi usage which can be managed through better timetabling. Planning can be involved with preferably one person in overall control, but no politicians. The respondent considered that there should be more flexibility within market sectors, led by private sector bodies who can react faster than public sector bodies.

Question 16: Do you agree that we should review the secondary frontages policy, which restricts non-retail uses in some sections of frontage, to allow greater flexibility for non-retail uses in some areas?

Question 16 – Overview: Summary of Responses

15 respondents provided comments on this question, of which one was not duly made. 8 of the respondents agreed that the policy on secondary frontages should be reviewed, to allow greater flexibility for non-retail uses.

However, one of the respondents considers that the review should be extended to primary retail frontages including the designation affecting Market Walk Shopping Centre. The respondent provided some evidence which suggests that the primary retail frontage policy has proven to be a significant barrier to securing full occupancy of Market Walk. It was also suggested that the Central Area Action Plan policy on the Market Square could be enhanced by acknowledging the area as a leisure destination and allowing greater flexibility for restaurant uses at Market Walk.

Another respondent states that there should be flexibility to allow childcare provision (including day nurseries and pre-school) within these frontages.

One respondent mentioned that Northampton could compete with Milton Keynes and Rushden Lakes if it was a destination of specialist shopping backed by Grade A department stores with an “emporium approach”. The respondent states that Northampton town could be stunning and with better marketing – using advice from national agencies - would go a long way. It was suggested that cleaning up the centre, encouraging a more brand diverse centre and changing the night time economy would improve the town centre.

One respondent was concerned that the increased flexibility of secondary retail frontages should not be at the expense of primary shopping frontages. The respondent considers that these too need more flexibility. The respondent wanted

more information on which non-retail uses the Options question 16 was referring to. It was suggested that the primary frontages should be looked at first before addressing secondary frontages. There is a need to consider whether retail designations are accurate and whether they are likely to be consolidated as online growth continues and high streets become more service driven. The respondent also referred to the evolution of the high street.

One respondent did not understand the question and sought clarification on this.

One respondent (not duly made) made reference to hi tech businesses above retail outlets and to live-above shop properties of C19th and C20th. The respondent also mentioned that no car parking should be allowed and that people should live within the town centre to increase footfall for all retail outlets. The same respondent recommended that a team should be in total control of the whole process of finding the empty units and filling them in the right way with possible modification where necessary. The respondent suggested that NBC should be the key point of reference. This should be set to dominate the town in future development (next 10-20 years).

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

Question 17 – Overview: Summary of Responses

12 respondents commented on the question, of which one was not duly made. 4 respondents agreed that within the town centre, some of the medium and larger sized office allocations are oversupplied. 2 respondents consider this to be the case but referred to the need for a robust and updated evidence base. One mentioned that they need to be used for flats or apartments. Another wanted heritage assets to be included in the explanatory text. Only one respondent was unsure if these office allocations are oversupplied.

One respondent (not duly made) commented that Belgrave House can have open plan offices for hi tech and creative arts/ media companies but not big office units. There are numerous empty units for start-ups but business rates are far too high. The era of longer based companies within the town centre is over. NBC has to concentrate on SMEs and entrepreneurs. IT apprentices and trainers have to be based within Belgrave House and tackle the massive IT skills crisis.

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

Question 18 – Overview: Summary of Responses

There were 21 respondents to this question. 1 respondent welcomed all the suggested policies but overall it generated a mixed response depending on the professional/ personal interest of the individual responding to the consultation. The responses can be broadly divided into topics including: the process of plan making, travel and transport, housing, heritage, water and open space, sport, recreation, health and wellbeing. The responses have been grouped and summarised by the topic areas below.

Process of Plan Making

Four respondents made comments on this topic. Two expressed concern about the level of information provided by the Options Consultation Paper. 1 went on to say that without proposals maps, it was not possible to comprehensively respond. The other highlighted the importance of an evidence base to the preparation of a Local Plan. The respondent said, in the context of the Options Paper, that reference to an evidence base was unclear and it would be helpful to make its location clearer

A third respondent highlighted the importance of cross boundary working where environmental risks and opportunities are best considered at a 'larger than local' scale e.g. River Nene Nature Improvement Area; Flood Risk Sequential Test; River Basin Management. The final respondent stipulated that the Plan should be a relevant and proactive policy document; one that is responsive to the change in lifestyles since the 1997 Adopted Local Plan. It should have flexibility of attitude and simplicity of policy.

Travel and Transport

Five observations were made in relation to travel and transport. Two were concerned with the impact that the level of proposed growth would have on the Strategic Road Network. It was noted that any potential impacts should be considered as part of the development management process through Transport Statements or Transport Assessments. Particular reference was made to the effect growth could have on the operation of the M1 junctions. 2 respondents observed that the Greyfriars site should be the Town's bus station.

The final respondent outlined some existing traffic and social problems faced in the Horsley Road area. They highlighted the problem with vehicles (large and small) entering and exiting Horsley Road and Balmoral Road. Also, Kingsthorpe has two lanes each way, and vehicles are turning right across fast moving traffic (both directions). Finally, the bus stop opposite Horsley Road had been demolished in an accident. This problem they noted could be remedied by extending the central barrier from Barrack Road to Thornton Road junction.

Housing

Five respondents made observations around housing issues. The assurance through the Options Paper that the Plan would explore reasonable options to provide land to accommodate new homes, employment and other uses supporting growth was supported. There was also support for proposals to set a minimum residential density for Northampton Borough.

One respondent sought clarity on the Brownfield Register and Permission in Principle asking how this will sit alongside the Local Plan (Part 2) and the housing allocations it makes. Another requested more clarity through the Local Plan on a local affordable housing requirement, something more detailed than currently offered through the Joint Core Strategy.

The final respondent was also concerned with affordable housing issues. They wanted a clear policy on affordable housing that sets out the Council's ambition to meet local housing needs, and also local aspirations for affordable home ownership. This, they noted, should include clear reference to Rent to Buy as this is expected to be included in changes to the NPPF and PPG later this year.

Heritage

Four observations were made in relation to heritage. The first strongly welcomed the inclusion of heritage assets. Another suggested that heritage assets should be taken into account throughout relevant plan policies. A third recommended that 'Development within and in close proximity to Conservation Areas' would be more effectively titled 'Development within and affecting the setting of Conservation Areas'. Finally one advised that policies relating to Battlefields and Non-designated heritage assets should also be included.

Water

Five observations were made in relation to water issues, two of which supported the principle of the optional water efficiency standard being applied to both residential and non-residential developments. Another highlighted the scope for a policy on river ecosystem protection, preservation and restoration.

One respondent advised that it's not necessary to duplicate the requirements of the Joint Core Strategy Policy BN7A in the Local Plan Part 2. They went on to say that it would be helpful to consider whether there are any specific development criteria for the proposed allocation sites (once identified) that would relate to water and water recycling infrastructure. Finally it was noted that policies and Plan text would need to be updated once the Water Cycle Study and Strategic Flood Risk Assessment has been refreshed.

Open Space, Sport, Recreation, Health and Wellbeing

There were 4 responses that related to open space, sport, recreation, health and wellbeing. The first commented that Development Management policies should be developed to enable the delivery of the actions / outcomes of the Open Space, Sport and Recreation Strategy. Another welcomed the inclusion of policies that related to the natural environment. One requested a policy on play space having noted the shortage of this provision in earlier comments on the Option Paper. Finally it was

suggested that the inclusion of a health and wellbeing development management policy would help ensure (in a more structured and rigorous way) that new developments are taking advantage of opportunities to support and promote wellbeing and prevent ill health.

Other Policy Requests

One respondent sought a development management policy for licenced premises.

Another stated that CIL is a blunt tool. Not all development sites are the same; remediation costs for a central brownfield site are higher than an 'out of town' greenfield. A policy dealing with CIL appropriately should be included.

A request was received for explicit Development Management policies to support:

- a) applications from childcare providers to open new childcare settings in areas of need, particularly where new homes are being built and
- b) change of use applications from childcare providers seeking to establish childcare settings in neighbourhood centres

One respondent made the following requests:

- Policies should respect the existing community and prevent development that is not sympathetic to or likely to adversely affect the character of an area
- Policy to control infills within existing residential areas
- Policy on corner plot development in residential areas
- Stricter enforcement of limit of HIMO developments
- Policy on returning divided homes to family use

Finally, one respondent (not duly made) believed that a local Enterprise Manager should be appointed to further opportunities for hi-tech / IT / SME start-ups. They advocated residential development on brownfield sites near the town centre rather than within the SUE which they recommended should be "cancelled". In the first instance vacant properties should be renovated to create new housing opportunities. Flats should be built in gaps before considering greenfield development

Additional comments: unrelated to any Options Consultation questions

Additional Comments – Overview: Summary of Responses

9 respondents made comments which were not directly related to the Options questions. Their comments include:

- There were 3 objections (one not duly made) to the Options consultation on the grounds that the document fails to present a single option. Two respondents were concerned that since the next consultation is on the Draft Plan, there will be pressure to make minimal changes in order to get the Plan

submitted. Both respondents recommend that the Local Development Scheme be reviewed to make provision for a proper consultation on the substantive options being considered. One respondent was significantly concerned that in moving forward with the Plan, there will be no Draft Plan to consult on and NBC will be moving directly to a Proposed Submission Plan, meaning that the first opportunity to make representations on allocations will also be the final time representations can be made

- Two respondents state that if the level of growth to 2029 cannot be accommodated within the Northampton area, then the areas covered by the West Northamptonshire Joint Core Strategy should be explored next
- One respondent considered that referring to the 2012 SHLAA and relying on this to deliver the expected housing numbers is an unrealistic expectation
- One respondent wanted to know how the consultation responses to the Issues Consultation and the findings were used to inform the Options paper as this would demonstrate how the local community have been engaged in shaping the plan
- One respondent wished to be kept informed and consulted as the Northampton emerging plan will remain pertinent to their local authority
- Another respondent (not duly made) provided details on guidelines associated with ancient woodland. The respondent states that it was not in a position to input into the consultation process for Local Plans. However, information was provided to assist the Council

APPENDIX 1:
Index of Respondents

Responses Submitted by Website
BSH Projects Ltd
(Construction Futures) Fusion21 Ltd
Resident
Discovery Walking Guides Ltd
Resident
Resident
Northamptonshire Police
Northamptonshire County Council (Highways)
Northamptonshire County Council (Project Officer)
Northamptonshire County Council (Public Health)
Queen's Park Residents Association
Town Centre Conservation Area Advisory Committee
Responses Received by Email/ Post
Anglian Water Services Limited
Davidsons Developments Limited
Bloor Homes and Martin Grant Homes Ltd
Clayson Country Homes
UGS Northampton Limited
Daventry District Council
David Wilson Homes (South Midlands)
Northamptonshire Shopping Centre limited Partnership
Environment Agency
Hardingstone Parish Council
Highways England
Historic England
Resident
Althorpe Estate
National Federation of Gypsy Liaison Groups
Natural England
Northamptonshire County Council (Planning Services)
North Northamptonshire Joint Planning Unit
Persimmon Homes
Resident
Roxhill Developments Limited
Martin Grant Homes & Harcourt Developments
Miller Homes
Resident
Sport England
Springs Voice
Rentplus
The Friends of Northampton Castle
Moulton College
Borough Council of Wellingborough (Planning)

Not Duly Made Responses (Late)
Bedford Borough Council
Forestry Commission
Great Houghton Parish Council
Resident

APPENDIX 2:
Number of Respondents Received by Options Paper Question

Question from Options Paper	Number of Respondents Received
1	22
2	23
3	21
4	20
5	20
6	19
7	16
8	16
9	18
10	15
11	11
12	11
13	11
14	15
15	13
16	15
17	12
18	21
Additional Comments (Not related to any questions)	9