



SOUTH NORTHAMPTONSHIRE COUNCIL

MEMORANDUM

To: Development Management (Daniel Callis)

From: Planning Policy

Date: 30th October 2017

Our Ref: S/2017/2577/EIA

Planning application advice

Proposal: Outline application for a residential development of up to 525 dwellings, open space, children's play area and associated infrastructure (Application accompanied by an Environmental Statement)

Site: Land North of Newport Pagnell Road, Hackleton

1. Development Plan / Local Plan

The Development Plan comprises the adopted West Northamptonshire Joint Core Strategy (JCS), the 'saved' policies of the adopted South Northamptonshire Local Plan (SNLP). The emerging Part 2a Local Plan is still at an early stage (regulation 18) and the preferred approach is presently out for consultation. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan, unless material considerations indicate otherwise.

This is an outline application with all matters reserved, except for access. The comments, set out below, are therefore focused on the principle of development (location and quantum).

Neighbourhood Plan Policies:

A Neighbourhood Area was designated for the whole of Hackleton Parish on the 18th October 2017. This is the first formal stage in the Neighbourhood Plan process and designation enables Hackleton Parish Council to prepare a Neighbourhood Plan. This plan is at a very early stage and carries no weight in decision making at this point in time.

Any Neighbourhood Plan prepared will need to accord with the strategic policies of the Local Plan; this includes the West Northamptonshire Joint Core Strategy. It will

not be able to promote lower levels of development than are identified within the Local Plan.

South Northamptonshire Local Plan (saved Policies):

The site's allocation in the JCS (an the adoption of JCS policy N6) supersedes the conflict with saved EV2 and EV8 of the SNLP

2. Joint Core Strategy for West Northamptonshire

The West Northamptonshire Joint Strategic Planning Committee adopted the West Northamptonshire Joint Core Strategy (WNJCS) in December 2014.

Policy S1 seeks to focus development in and adjoining the urban area of Northampton. The proposal is consistent with this policy, forming part of an allocated urban extension to Northampton. The site is allocated by virtue of policy N6 'Land South of Brackmills'; the proposed red line is consistent with the allocation and an indicative master plan has been provided to accompany the application.

Land South of Brackmills straddles the administrative boundary of Northampton and South Northamptonshire and makes provision for 'in the region' of 1,300 homes. On the 14th April 2016 consent was granted on appeal for 1,000 dwellings (N/2013/338), wholly within Northampton Borough. This leaves a residual balance of approximately 300 dwellings to be delivered as part of the SUE. However, there is flexibility within the wording of policy N6, which allows additional dwellings to be delivered on the SUE where these are appropriately justified and policy compliant. This proposal is for 525 dwellings (with up to 35% affordable, subject to viability). This would mean the SUE would deliver approximately 1,525 homes.

At the Pre-Application stage (July 2016), advice was provided that reiterated the average density requirements on SUEs set out within the JCS is an average of 35 dwellings per ha (WNJCS Policy H1). Paragraph 9.13 explains "*it is important that minimum densities are achieved within the proposed SUEs to reduce the amount of greenfield land that needs to be released for development*". Based on an indicative estimate of developable area (in excess of 13.2ha) it was suggested that the site should be able to deliver at least 460 dwellings. The proposals indicate a figure of 525 dwellings can be accommodated whilst maintaining a landscape buffer to the north of the site, appropriate green space and other supporting infrastructure.

It is noted many of the facilities expected to be delivered under policy N6 have been granted permission as part of the HCA site (within Northampton Borough). Appropriate financial contributions, through both S106 and CIL will need to be secured to ensure the timely delivery of supporting infrastructure included within Policy N6 (primary school, local centre- inc. health care, integrated transport network, green infrastructure, landscape buffer, open space and leisure, flood risk management) that will also serve potential residents of this site. Other site specific infrastructure to mitigate local impacts directly arising from the development may also be required- for example, contributions towards to Northampton Growth Management Strategy (NGMS) to manage the impacts of development on the A45 trunk road.

As an outline application, no details of the proposed housing mix has been provided (paragraph 4.1 of the applicant's planning statement indicates this will not be forthcoming until the RM stage). Policy H1 requires that new housing development will be provided for a mix of housing types, sizes and tenures to cater for different accommodation needs including the needs of older people and vulnerable groups. Criteria A-G set out specific considerations including location and setting, the implications of density for affordability and viability and the impact on amenities of neighbouring properties.

The principle of 525 dwellings (35% affordable housing) is considered broadly in conformity with the relevant policies of the WNJCS.

3. South Northamptonshire emerging Local Plan Part 2

The South Northamptonshire Part 2a Local Plan is currently at consultation. This plan is at an early stage of preparation and will not carry significant weight in decision taking at this time.

However, it should be noted Draft Policy NRDA1: Residential Development Adjoining the NRDA, is intended to help address significant issues with delivery and supply in the NRDA, particularly in the shorter term.

In principle, an increase in supply through an allocated site, such as Land South at Brackmills, will assist with supply for the NRDA and may help to reduce pressure on additional land adjoining Northampton that will need to be brought forward through the Local Plan part 2a policy.

The proposal does not conflict with the emerging policy position of the Local Plan Part 2a.

4. National Planning Policy Framework

The NPPF was published in March 2012 with the intention of 'simplifying' the planning process through the introduction of a single, streamlined policy document thus replacing the previous regime of PPSs and PPGs. Central to the NPPF is the 'Presumption in Favour of Sustainable Development', which seeks to ensure that proposals that are in conformity with the Local Plan are approved 'without delay'; this includes not only the principle of development on a particular site, but also accordance with other policies such as those that require the necessary supporting infrastructure. The NPPF sets out three dimensions of sustainable development: economic, social and environmental. It is important that proposals for development contribute towards meeting these goals.

Of particular relevance to this proposal is Section 4: Promoting Sustainable Transport and section 6: Housing.

Paragraph 34, seeks to ensure developments that will generate significant movement are located where the need to travel will be minimised and the use of sustainable modes can be maximised. The proposal, in accordance with Policy N6 meets the requirements of the NPPF in this regard. The proposals will be required to be supported by a travel plan. The suitability of this document will need to be assessed by Northamptonshire County Council.

Paragraph 32 (3rd bullet) states “*Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*”. It is noted that one of the reasons for refusal given by Northampton Borough to the neighbouring scheme (forming part of Northampton South of Brackmills) was on highway grounds. We note concerns raised by Northampton Borough Council at appeal, including impacts on the local road network were dismissed by the Inspector. Notwithstanding the Inspector’s conclusion, as this proposal seeks to further increase the number of homes, it will be necessary to carefully consider the responses of both Northamptonshire County Council (Local Road Network) and Highways England (strategic road network) to ensure the cumulative impact of this proposal, together with the 1000 units already granted permission, is acceptable or can be mitigated to protect the health and amenity of existing and future local residents and communities.

Paragraphs 47-55 set out Government Policy in respect of housing. Paragraph 47 requires Local Authorities to ‘significantly boost’ the supply of housing. This is to be achieved through ensuring the Local Plan meets the full, objectively assessed needs for the housing market area; to identify and update annually a supply of specific, deliverable sites (including a relevant buffer) for a 5 year period; and identify specific developable sites for 6-10 years. Paragraph 49 indicates that housing applications should be considered in the context of the ‘Presumption in favour of sustainable development’ and that relevant policies for the supply of housing are ‘out of date’ where the authority is unable to demonstrate a 5 year supply. The land supply position for the NRDA is discussed further below.

Subject to the traffic impact being acceptable, the proposal is considered to positively contribute to the delivery of sustainable development, in particular the government aim to ‘significantly boost’ the supply of housing.

5. National Planning Practice Guidance (PPG)

On 6 March 2014 the Department for Communities and Local Government (DCLG) launched the planning practice guidance web-based resource. Planning practice guidance is now available entirely online and will be updated as needed. The guidance is intended to support the NPPF. Both the PPG and NPPF can be found via:

<http://planningguidance.planningportal.gov.uk/>

6. Five-year Housing Land Supply and the Applicant’s Planning Statement

South Northamptonshire is able to demonstrate a robust 5 year supply of Land. However, this proposal is intended to support the growth of Northampton.

As of April 2016, Northampton Borough was only able to demonstrate 3.95 years supply when a 20% buffer is applied; this equates to a shortfall of some 2929 units. A 20% buffer is considered to be appropriate as Northampton has failed to deliver its planned requirement in seven of ten years, including recessionary and non-recessionary years. This approach is consistent with the Inspector’s conclusions at

the appeal for the HCA land to the North, which forms the other part of the SUE (Land South of Brackmills).

Northampton Borough Council has recently published a 'Sites Consultation' as part of its Part 2a Local Plan. This indicates that there could be potential for additional sites to come forward within the Borough Boundary. This assessment is only part of the evidence base and many of the sites may not be suitable when assessed in further detail. Therefore, it is not considered all of these sites would meet the tests set out within the NPPF of being deliverable (e.g. suitable, available and achievable).

This proposal is considered to positively contribute to meeting Northampton's housing needs. However, as a large proportion of Northampton's delivery is connected to larger SUE developments, which have to date proved slow to deliver the required housing needs, it would be beneficial if the applicant could provide an indicative delivery trajectory to assist in understanding the contribution the site will make to the short-term 5 YLS.

The proposal will positively contribute to meeting the housing needs of the NRDA through making efficient use of land allocated within the adopted development plan; it is supported in this regard.

7. Supplementary Planning and Interim Guidance

This proposal is seeking outline permission. South Northamptonshire Council has recently adopted guidance in respect of design, and has prepared draft guidance on car parking. Both documents should be highlighted as a consideration for the Reserved Matters stage, should the principle be acceptable.

8. Conclusions

- Ø Regard must be had to Section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.
- Ø The proposed development is considered to be **acceptable in principle** and is broadly in accordance with the policies of the WNJCS (H2, N6 in particular), subject to the delivery of affordable housing and supporting infrastructure.
- Ø As this proposal will exceed the identified figure within policy N6 (1,300 homes) it will need to demonstrate that it does not have an unacceptable cumulative impact on the highway network or other infrastructure.

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