Summary Proof of Evidence

Graeme Tulley

The Homes & Communities Agency

Land South of Brackmills
Newport Pagnell Road
Northampton
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Prepared by

GL Hearn Limited
280 High Holborn
London WC1V 7EE

T +44 (0)20 7851 4900
glhearn.com
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1 SUMMARY PROOF OF EVIDENCE

1.1 Graeme Tulley will say:

1.2 My name is Graeme Tulley. I am a Planning Director at GL Hearn. I have over 30 years’ experience as a Planning, Development and Regeneration consultant. I hold a BA (First Class Hons) degree in Geography from Kings College London, an M.Sc (Econ) in Urban and Regional Planning from the London School of Economics, and a Diploma in Town Planning from the University of Westminster.

1.3 I have been a member of the Royal Town Planning Institute (MRTPI) since 1984. I am a member of the Planning and Regeneration committees of the British Property Federation (BPF) and the British Council of Shopping centres (BCSC).

1.4 I was first instructed by the Homes and Communities Agency (HCA) in 2011 as part of Parsons Brinkerhoff’s team to prepare a Planning Statement to accompany the submission of the outline planning application, and more recently to prepare planning evidence for this Appeal.

1.5 The Appeal site has been held as land for development by Government agencies since Northampton was designated a “new town” in 1968. The HCA owns the site and has promoted it through the development plan process, consulting extensively with the local authority, other stakeholders and the public.

1.6 A thorough and collaborative design led master planning exercise has been undertaken by the HCA and its consultant team in consultation with the planning authorities, other stakeholders, statutory bodies and the public. This masterplanning approach led to the submission of an outline planning application in March 2013. The proposals respond positively to their setting.

1.7 Despite NBC’s Head of Planning recommendation to grant planning permission, Northampton Borough Council refused the outline application on two grounds concerning highways and landscape matters, citing “insufficient information” before the Planning Committee and that the proposal is “contrary to the overarching intentions of the NPPF”.

1.8 The Appeal site is now allocated at Policy N6 as part of the Northampton South of Brackmills SUE in the recently adopted (December 2014) West Northamptonshire Joint Core Strategy Part 1.

1.9 The Appeal site is much the greater part of the Northampton South of Brackmills SUE, comprising 1000 out of the 1300 dwellings allocated. There is nothing in the application proposals that would prevent or prejudice the additional 300 dwellings from coming forward in a separate application.
1.10 NBC has supported the allocation for 1000 dwellings since the beginning of the JCS process in 2008. NBC only objected to the Inspector’s proposed modifications in February 2014 to extend the allocation eastward to accommodate an additional 300 dwellings. It did not at that time object to the original 1000 dwellings allocated on the HCA land.

1.11 NBC Head of Planning recommended that planning permission be granted and her report to Planning Committee members strongly supported the proposal. The Officer’s report states that the proposals are consistent with the NPPF and consistent with what at the time of determination was a well advanced West Northamptonshire Joint Core Strategy Part 1.

1.12 There was no evidence, appraisal or indeed suggestion within the Officer’s Report that would justify refusal on landscape and highways grounds, or indeed any other ground.

1.13 There were no objections from the Highways Agency or County Council to the proposals on highways grounds.

1.14 Eight Sustainable Urban Extensions (SUEs) are allocated in the JCS in Northampton, including the Northampton South of Brackmills SUE which contains the Appeal site. The SUEs comprise some 42% of the deliverable 5 year housing land supply identified by NBC. They are therefore pivotal to NBC meeting it’s objectively assessed housing needs as set out in the adopted JCS.

1.15 NBC acknowledges in the Principle Statement of Common Ground that it does not have a five year housing land supply with a 5% buffer in place, in the Northampton Related Development Area (NRDA). The Council’s assessment assumes that all Sustainable Urban Extensions (SUEs), including the Appeal site within the south of Brackmills SUE, make a significant contribution to the five year supply.

1.16 However, given the Council’s refusal of permission for not only the Appeal site at Brackmills SUE (projected to contribute 250 dwellings to the five year supply), but also the Collingtree SUE (projected to contribute 375 dwellings, but also now subject to Appeal), and which are collectively are allocated for 2300 dwellings in the JCS, the real 5 year housing land supply picture is much worse.

1.17 In January 2015 the full Council of NBC resolved to adopt the JCS (the Adoption Report), but to object in principle to the inclusion of Brackmills SUE (and indeed the Collingtree SUE) within the JCS.

1.18 This extraordinary decision to object to key policies (in the case of this Appeal Policy N6) of one’s own recently adopted JCS looks to make a mockery of the development plan process. In this
context, NBC is a constituent member of the JSPC and bound by its decision to adopt the JCS in its entirety, i.e. including Policy N6 allocating the south of Brackmills SUE for 1300 dwellings.

1.19 NBC’s Adoption Report is de facto seeking to create new planning policy by deleting two SUEs from the JCS. The JCS has taken some 6 years to adopt using a most thorough and up to date evidence base, sustainability appraisals, public consultation and Examination in Public. This was part of a democratic process, to which NBC willing signed up to in 2008.

1.20 There is a strong argument (based on the Council’s own figures and the West Northants JPU monitoring work) to say on past performance NBC should adopt a 20% buffer in its land supply. On this basis and deducting the two “objected to” SUEs from the deliverable supply, NBC has a land supply of 3.95 years in the NRDA. Nowhere does NBC propose deliverable replacement provision.

1.21 The impact of deleting SUEs from the housing land supply is likely to be catastrophic to meeting needs and targets. Quite apart from the loss of deliverable housing land supply, NBC’s actions threaten to seriously weaken market confidence to bring forward other applications.

1.22 The JCS development plan is up to date and must carry full weight. As set out at Paragraph 14 of the NPPF, planning permission should have been granted “without delay”.

1.23 The benefits of the scheme are demonstrable and compelling, making substantial contributions to the economic, social and environmental well-being of the area. In the view of the NBC’s officers, the ES assessment, and my evidence, the benefits of the proposal far outweigh any potential dis-benefits. The requirements of Policy N6 and the NPPF are met by the appeal proposals.

1.24 Mr Tricker in his evidence demonstrates that there is no “nil detriment” to highways (a higher test than called for by the NPPF).

1.25 Mr Brashaw in his evidence demonstrates that any impact on the skyline and landscape is limited and capable of being addressed through design and mitigation.

1.26 In my evidence I address the planning policy issues surrounding the Appeal proposals.

1.27 I agree with the Head of Planning’s’ view in her Officer’s Report that the application proposals are consistent with the NPPF and the policies of what at the time of determination was the advanced West Northamptonshire Joint Core Strategy Part 1. The JCS is now adopted and in my opinion should be accorded full weight in determining the proposals before the Inquiry.

1.28 Consequently, there is no reason within the scope of my evidence why planning permission should be refused and I respectively submit that planning permission be granted.