

[REDACTED]

From: Ross Middleton [REDACTED]
Sent: 13 June 2019 15:43
To: Planning Policy
Subject: NLP2 DRAFT SUBMISSION (Mr. D Oliver St. Clair Land and Developments LLP - Bedford Road)
Attachments: Bedford Road.pdf

Dear Sir / Madam,

On behalf of our client St. Clair Land and Developments LLP, please find representations in response to the ongoing consultation into the emerging (draft) Part 2 Local Plan for Northampton Borough.

Should you wish to discuss the content of the attached or the site itself then please do not hesitate to contact me.

Kind regards,

Ross.

Ross Middleton BA (Hons) MA MRTPI
Principal Planning Consultant

Tel: [REDACTED]
Email: [REDACTED]

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CC Town Planning, Newton House, Northampton Science Park, Kings Park Road, Northampton, NN3 6LG

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Your ref:
Our ref: RM/NLP2/Bedford Road
Direct ne:
E ma :
Date: 14th June 2019



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Northampton Science Park
Kings Park Road
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Northampton
NN3 6LG

www.cctownplanning.co.uk

NLP2 Submission Draft
Planning Policy
Northampton Borough Council
The Guildhall
St Giles Square
Northampton
NN1 1DE

Dear Sirs,

RE: Northampton Borough Council Local Plan (Part 2) Options Consultation Paper.

Site Ref: 1138.

Representations on behalf of St. Clair Land and Developments LLP.

CC Town Planning have been appointed by Mr. D Oliver of St. Clair Land and Developments LLP ('the client') to provide town planning consultancy services in respect of their land and property interests within Northampton Borough.

The following correspondence is submitted in response to Northampton Borough Council's ('NBC') ongoing consultation in respect of the progress to adopt their Part 2 Local Plan ('NLP2') for the Borough.

This submission seeks to respond to the content of the recently published Northampton Borough Local Plan (Part 2) Submission Draft which has been published for the purposes of public consultation under Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2012 (as amended).

For information, the respondent has also made representations to earlier consultations in respect of the NLP2 and it is urged that this submission be read in conjunction with their earlier engagement.

This submission is made against the context of their land holding to the south of Bedford Road, Northampton which has been designated reference 1138

within emerging Policy 12 and the associated Housing Trajectory contained within Appendix A of the emerging plan.

The client has now had chance to consider the emerging NLP2 and the following comments have been structured to respond to those relevant elements set out both within the document and the accompanying response form.

At the outset our client commends the pro-active and pragmatic way in which the Borough Council have approached the plan making process, particularly in light of the current housing land supply issues faced within Northampton Borough.

It has long been recognised that in order to develop Northampton's national role through attracting investment and visitors to the area, a pragmatic and achievable plan which can realistically achieve consistent growth to meet the needs of the current population and those who wish to live and work in the Borough, as well as those who will visit the town is required.

It is considered that the NLP2, when ratified, will play a vital role in delivering housing and economic growth in tandem, whilst addressing those acute land supply issues, particularly in regard to housing delivery, which exist within Northampton Borough.

When assessed against the reasonable alternatives it is considered that the NLP2 sets out a sound strategy to meet the most recent objective assessment of needs present within the Borough and will support housing delivery in the plan area through to 2029. Whilst the document is considered to be sound our client has the following comments to make, including suggested minor amendments, which would further confirm the soundness of the plan.

The acknowledgement, at **Para 61**, that housing delivery is the main challenge which the local authority face is welcomed. In line with the requirements contained within the revised National Planning Policy Framework ('NPPF') (2019) it is hoped that the final provisions contained

within the document will play a major role in supporting the Government's objective to significantly boost housing supply.

Whilst the thrust of the Client's representations relates to the strategic approach to future housing delivery, those more detailed policies have also been considered to ensure that the overall vision and objectives for the Borough can be achieved.

The thrust of **Policies 2** (Placemaking), **3** (Design) and **4** (Amenity and Layout) are welcomed. In respect of Policy 2, bullet 3 of that policy contains reference to 'important views', whilst information in respect of heritage assets and conservation area appraisals are clearly signposted, it is considered that a reference within the policy or supporting text which sets out that evidence where information on important views can be found.

In terms of **Policy 3**, whilst reference is contained to 'small scale developments' in the last paragraph of the policy. It is considered that reference should be included in the earlier part of the policy to ascertain the size of development which would be required to adhere to the 4 bullet points contained therein. The client does however welcome the content of the policy.

In regard to amenity and layout and the content of **Policy 4** and its supporting text. The approach is welcomed and is considered to be consistent with national policy. However, it is considered that there should be a notation within the policy or supporting text to link to any future SPD's which could provide further details and standards to assist applicants in the preparation of planning applications.

It is considered that **Policy 5: Sustainable Construction** will perform a role in achieving the sustainable development policies contained within the West Northamptonshire Joint Core Strategy. However, it is considered that the policies requirements which are covered elsewhere, for example within Part G2 of the Building Regulations should be removed. Such standards are a requisite of the building regulations system and therefore consideration of such issues at the planning application stage are considered overly onerous

unless planning permission is required for the siting of any plant and equipment to achieve such standards.

Chapter 7: Housing is of significant interest to our client, the acknowledgement at Para 116 that *'the number of dwellings delivered by 1st April 2018 falls some 1475 units short of the delivery trajectory set out within the JCS'*, is a clear indication that the NLP2 needs to take significant steps to boost the supply of housing within the Borough.

It is clear that there is a significant over reliance upon the SUE's to meet the strategic housing delivery target contained within the JCS and the approach within **Policy 12** seeks to bring forth development in the short term to compliment the larger longer-term growth which will be achieved through the SUE's. However, at the outset, it is considered that further land could, and should, be allocated and listed within the policy to ensure the timely delivery of residential development and to guarantee the ability of NBC to be able to demonstrate a 5-year housing land supply at the point of adoption.

Allied to the above amendment, it is also considered that the heading of the third column within the table at Policy 12 which is currently titled *'Dwelling Capacity'* should be amended to ensure that it does not serve as a cap on development. Given the acute housing land supply issues faced within the Borough and the now urgent need to significantly boost housing land supply, it is considered that this column heading could be suitably revised to an 'about' or 'minimum of' figure to ensure that it doesn't serve as a cap on development.

The inclusion of the client's land which falls to the south of Bedford Road (Site Ref: 1138) is welcomed. On their behalf we can confirm that this suitable site remains available for development and is under the ownership of a landowner who has an appetite to deliver a residential development at the site in the short term to assist in meeting those housing needs present within the Borough. To this end we can also therefore confirm the sites immediate availability and can confirm that there are currently no known technical constraints which would prevent its future development for residential purposes.

Whilst the proposed allocation of the site, through **Policy 12**, is clearly welcomed it is considered that the similar reference within **Policy 33: Development Allocations** needlessly repeats the policy coverage for our client's site which is contained within Policy 12 and could cause unnecessary confusion.

The final paragraph of Policy 12 contains a cross reference to draft **Policies 34 to 38**. Having reviewed the content of these associated policies, it is clear that only a small number of those housing and other housing led allocations are relevant to their content. In light of this, it is considered that a footnote which highlights those relevant sites would be welcomed within Policy 12 itself or within the supporting text.

Whilst it is accepted that all new development should seek to meet those housing needs which are present within the Borough, it is considered that the current content of **Policy 13** is not flexible to changing profiles over time. In terms of market and affordable housing mix, it is the client's opinion that this element of the policy should be amended to provide clarity that this is the indicative mix required at the start of the plan period. Given the length of the plan period up to 2029, it is anticipated that the needs profile will change and therefore it is urged that the policy contained reference to periodic updates to the Strategic Housing Market Assessment and the influence that this will have on the housing mix that NBC will seek from residential led proposals to meet the ever changing needs profile of the Borough.

It is also considered that those references to specialist accommodation and accessible housing should contain a cross reference to the Strategic Housing Market Assessment as the evidence contained therein would provide more up to date evidence on the level of specialist and accessible housing required. In its current form it is considered that the inclusion of detailed prescription within Policy 12 leaves the document inflexible to future changing circumstances.

Finally, consideration has been afforded to Appendix A and the housing trajectory contained therein. The client welcomes the growth estimates set

out within the document which sees their site delivering units to the market from the 2022/23 monitoring period. However, given the landowners appetite it is considered that these figures could be revised to reflect their optimism in respect of early delivery.

Therefore, it is considered prudent to inform you that the client is carrying out a range of feasibility work and technical work for the site is also progressing. There is a real appetite to develop the site and it is their intention to submit a pre-application enquiry in the second half of 2019 with a view to submitting a planning application in early 2020. Allied to this, and subject to the necessary consents, it is considered that the following trajectory would be a more realistic estimate;

21/22	22/23	23/24	24/25	25/26	26/27
7	0	0	0	0	0

Having maintained a watching brief on the Council's efforts to formalise the submission of the NLP2, it is clear that significant efforts have been made by officers to get the document to this stage. Our client commends these efforts and it is hoped that the above suggestions will be taken on board prior to the submission document being issued to the Secretary of State.

Notwithstanding the above, it is the client's opinion that the draft DPD is both legally compliant and sound.

We would like to be kept up to date with the progression of the DPD and therefore request that we be retained on the Council's consultation database and notified of the documents submission for independent examination. As requested, the requisite representation form has been completed and is enclosed.

As stated in previous submissions to the NLP2 process, our client's site presents an immediately available opportunity to deliver much needed residential development, in the short term, to assist in alleviating the acute housing land supply issues the Borough currently faces.

Should you wish to discuss any of those points raised above or the information contained within the attached document then please do not hesitate to contact me. Additionally, if you require any further information in relation to the site then please do not hesitate to get in touch via any of those channels listed above.

Finally, if you could confirm receipt of this letter by return it would be greatly appreciated.

I look forward to hearing from you.

Yours sincerely,



Ross Middleton BA (Hons) MA MRTPI
Associate



REPRESENTATION FORM FOR THE NORTHAMPTON LOCAL PLAN PART 2 PROPOSED SUBMISSION DRAFT (REGULATION 19 CONSULTATION)

Northampton Borough Council is preparing a Local Plan Part 2 for the Borough which will supplement the West Northamptonshire Joint Core Strategy and will replace Saved Policies in the Northampton Borough Council Local Plan (1997). The Local Plan Part 2 will cover the period to 2029. This stage is the Proposed Submission Draft Local Plan Part 2 (Regulation 19) and is the version of the plan that the Council intends to submit to the Planning Inspectorate for independent examination.

This form should be used to make representations on the Northampton Borough Council Local Plan Part 2 Draft Submission.

You can submit your representation online using our electronic form through the link below:

www.northampton.gov.uk/lp2proposedsubmission

A downloadable version (MS Word) is also available on the same page.

Under the General Data Protection Regulation (GDPR), Northampton Borough Council needs to inform you of the reasons why we are capturing your data and what we will do with your data. Any personal data collected and/or processed will be dealt with in accordance with the Data Protection Legislation and the Council's Data Protection Policy. Data is held securely and accessed by, and disclosed to, only individuals where relevant to this policy / procedure.

View Northampton Borough Council's Privacy Policy here:

<https://www.northampton.gov.uk/info/200031/data-protection/175/data-protection>

Please note that it is not possible for representations to be considered anonymously. Representations will be published on the consultation website and included as part of the submission to the Inspector. Address and contact details will be removed from published responses.

I agree to the Council collecting my personal data so that they can process my reply to the Northampton Local Plan Part 2 Proposed Submission Draft Regulation 19.



Yes (please tick)

Please complete and submit by 5pm on Friday 14 June 2019.
Responses received after this time will not be accepted

Ref:

(For office use only)

This form has 2 parts:

Part A Personal details

Part B Your representation(s).

Please fill in a separate sheet for each representation you wish to make

Part A: Personal Details

Q1: Are you making this representation as? (Please tick as appropriate)

- a) Resident or member of the general public ☐
- b) Local Authority or Town/Parish Council ☐
- c) Landowner ☐
- d) Agent / Consultant (on behalf of) ☒
- e) Other organisation (please specify which type of organisation below):

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in column 2.*

	Personal Details	Agent's Details (if applicable)
Title	Mr	Mr
First name	D	Ross
Last name	Oliver	Middleton
Job title (where relevant)		Associate
Organisation (where relevant)	St Clair L and D LLP	CC Town Planning
Address line 1	C/O Agent	Suite 7, Newton House
Line 2		NSP
Line 3		Kings Park Road
City / Town		Northampton
County		Northamptonshire
Postcode		NN3 6LG
Telephone number		
Email (if provided we will always contact you this way)		

Part B: Representation(s)

Please use a separate sheet for each representation

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Please note all comments will be made publicly available. If you do not have sufficient space in the box, please continue on a separate sheet or expand the box.

2: Do you consider the Northampton Local Plan Part 2 to be legally compliant?	Yes	<input checked="" type="checkbox"/>	No	
If NO , is this because it is: (please tick all that you think apply)				
Not prepared in accordance with the Local Development Scheme				
Not prepared in accordance with the Statement of Community Involvement				
Not consistent with the regulatory requirements for consultation				
Not compliant with the duty to cooperate				
Not accompanied by a compliant Sustainability Appraisal				

2 (1): Please give details of why you consider the Northampton Local Plan Part 2 Submission Draft document is not legally compliant. Please be as precise as possible.

Please see accompanying letter

3: Do you consider the Northampton Local Plan Part 2 to be sound?	Yes	<input checked="" type="checkbox"/>	No	
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3 (1): If NO, is this because it is: (please tick all that you think apply)	
Not positively prepared	
Not justified	
Not effective	
Not consistent with national policy	

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
Please see attached covering letter			

4 (1): Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.

Please see accompanying letter

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

SUSTAINABILITY APPRAISAL

5. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number).	
Paragraph	
Comments	

HABITATS REGULATIONS ASSESSMENT

6. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number).	
Paragraph	
Comments	

7: If your representation is seeking a change, do you consider it necessary to take part and speak at the examination hearing(s) if invited to do so by the Inspector?

No , I do not wish to participate at the oral examination	✓	Yes , I wish to participate at the oral examination	
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8: If you wish to take part at the oral examination, please outline why you consider this to be necessary (please note the Inspector will determine who will be invited to be heard at the examination hearing(s))

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9: Please tick a box if you wish to be notified of further progress of the Local Plan Part 2 (please tick all that apply)

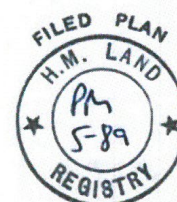
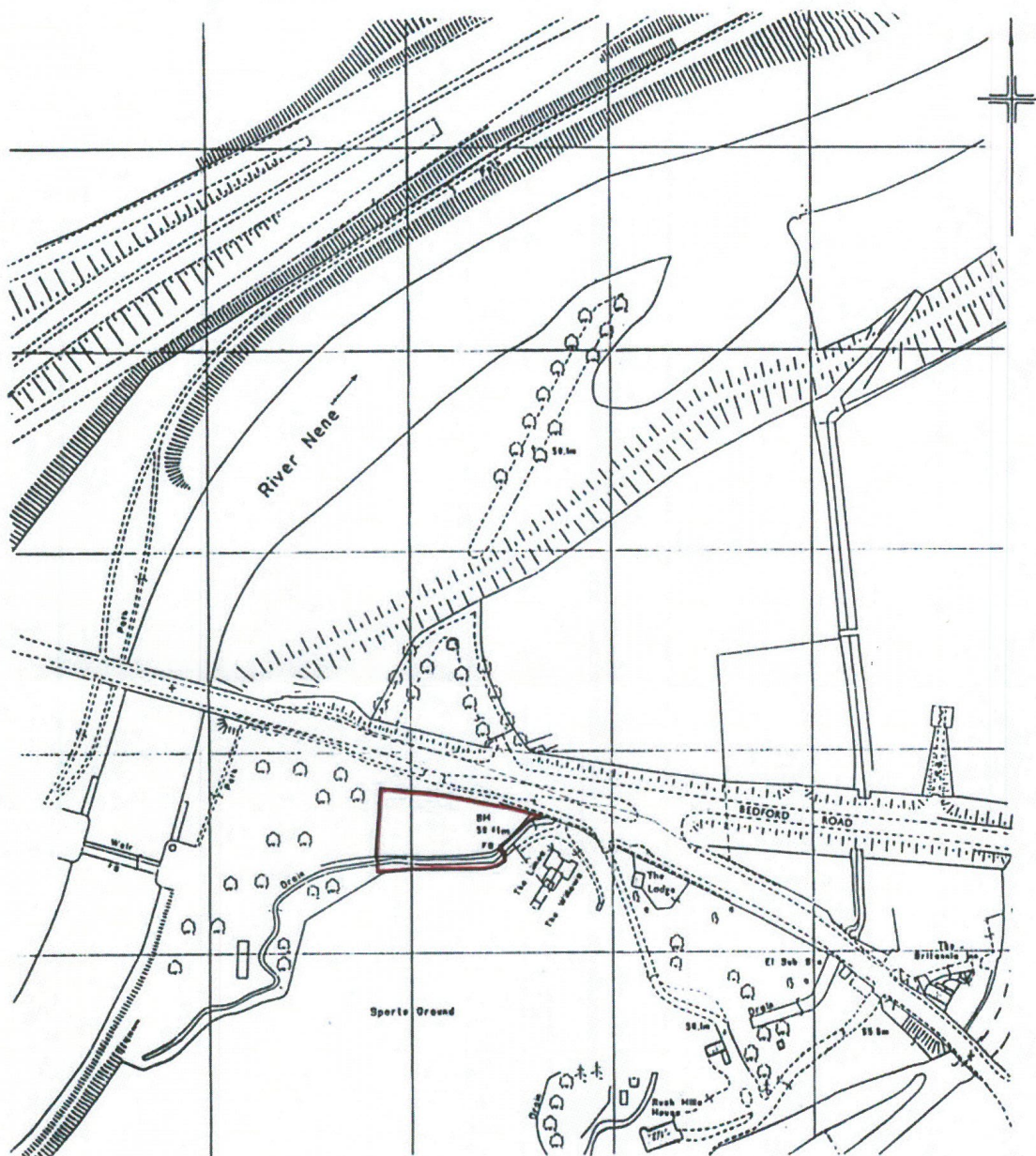
When the Northampton Local Plan Part 2 has been submitted for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended)	✓
When the report of any person appointed to carry out an independent examination of Northampton Local Plan Part 2 is published	✓
When the Northampton Local Plan Part 2 has been adopted	✓
Other (please specify)	

10: Signature		Date	14th June 2019
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**Thank you for taking the time to complete the form.
Please return it to:**

Email: 

H.M. LAND REGISTRY		TITLE NUMBER	
		NN111257	
ORDNANCE SURVEY PLAN REFERENCE	SP 7759		Scale 1/2500
COUNTY	NORTHAMPTONSHIRE	DISTRICT	NORTHAMPTON
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