

[REDACTED]

From: Beth Lambourne [REDACTED]
Sent: 14 June 2019 12:49
To: Planning Policy
Cc: Angie Fenton; Tim Rainbird
Subject: NLP2 SUBMISSION DRAFT - Equation Properties Limited - Site at Walter Tull Way, Sixfields
Attachments: Regulation 19 - Representation Form 140619.pdf; Regulation 19 - Representation Letter 140619 FINAL.pdf

Dear Sir / Madam,

On behalf of our client, Equation Properties Limited, please find attached representations made to the Proposed Submission Draft of the Northampton Local Plan Part 2.

I would be grateful of confirmation that the representations have been received and will be considered accordingly.

Please do not hesitate to contact me on the details below should have any queries or require any further information.

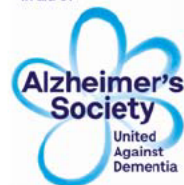
Kind regards,
Beth



Beth Lambourne
Planner



In aid of



Main: [REDACTED]
Mobile: [REDACTED]
www.quod.com

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Date: 14 June 2019



Planning Policy
NLP2 SUBMISSION DRAFT
Northampton Borough Council
The Guildhall
St Giles Street
Northampton
NN1 1DE

By email

Dear Sir / Madam,

Representations to the Northampton Local Plan Part 2 Proposed Submission Version (Regulation 19)
Site at Walter Tull Way, Sixfields, Northampton
Submitted on behalf of Equation Properties Limited

We are instructed by our client, Equation Properties Limited, to submit the enclosed letter of support to the draft Northampton Local Plan Part 2. Our client has an interest in the former Council landfill site at Walter Tull Way, Sixfields, Northampton. This site has been allocated for employment uses in the Emerging Northampton Local Plan Part 2 (Regulation 19 version).

The consultation period expires at 5pm on Friday 14 June 2019 and we therefore trust these representations will be taken into account.

1 Summary of Representations

The consultation proposes that the site at Walter Tull Way will be allocated for Employment Development. These representations provide commentary on the proposed allocation, as well as the relevant draft Employment Policies as set out in the Regulation 19 Version of the Northampton Local Plan.

In summary, Equation Properties Limited supports the overall vision and aspirations of the Northampton Local Plan Part 2 and welcomes the allocation of the site at Walter Tull Way for employment use. Equation Properties Limited also supports the approach to employment development as set out in Policy 15 and Policy 16 which seek to safeguard sites within Enterprise Zones and to positively welcome new employment related development.

Our client would welcome the opportunity to engage with Northampton Borough Council on the future of the site and to work positively with the Council to facilitate employment development in this location.



2 Site Context

This is a 9.34 hectare brownfield, former landfill site. It is located immediately to the east of Northampton Town Football Club in the Sixfields area of Northampton. The Site is bound in part by Walter Tull Way to the north west, beyond which is an existing leisure park. Edgar Mobbs Way forms the southern boundary. The Site is located within an area largely characterised by commercial uses, with existing employment uses to the east.

3 National Planning Policy Framework

The National Planning Policy Framework (2019) (NPPF) sets out the tests against which Local Plans should be prepared and assessed. Paragraph 35 of the NPPF sets out that Local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. This requires the plan to be:

- A) ***“Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- B) ***Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- C) ***Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- D) ***Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.”*

Local Plan policies should also follow the approach of the presumption in favour of sustainable development, as set out in Paragraph 11 of the NPPF.

The NPPF also sets out, at paragraph 80, that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Paragraph 81 continues that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth and set criteria or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period.

4 Emerging Employment Policies

Emerging policy S7 (Provision of Jobs) of the draft NBC Local Plan sets out the need to create an additional 28,500 new employment opportunities in West Northamptonshire between the period 2008 and 2029, which is consistent with the West Northamptonshire Joint Local Plan (2104).

Draft policy S8 (Distribution of Jobs) identifies that the majority of opportunities for employment development will be concentrated within the existing urban area of Northampton and, in part, delivered through industrial / mixed / office land (approximately 120 hectares) within the Northampton Waterside Enterprise Zone. It is clear that provision for employment land in Northampton will be key to ensuring that the aims and aspirations that are set out in the West Northamptonshire Joint Core Strategy can be achieved.

Emerging Policy 15 (Safeguarding existing employment sites) sets out that the Council will

‘safeguard all existing employment sites, including the Enterprise Zone, for employment use within the office, general industrial and warehousing and distribution sectors’

This includes the site at Walter Tull Way which is within the Northampton Waterside Enterprise Zone. The policy states that the Site has the potential to deliver a significant amount of employment floorspace in this location which has been recognised by the Council through the Land Availability Assessment (2017) and its inclusion in the Enterprise Zone area. The policy also sets out the Council’s ambition for ensuring that there is a sufficient delivery of employment development within Northampton across the plan period, which will contribute towards providing the 28,500 new employment opportunities set out in the overarching Joint Core Strategy.

It is therefore necessary for suitable employment sites to be identified and allocated in the Northampton Local Plan Part 2. The site at Walter Tull Way has been assessed as being appropriate for employment development and should continue to be considered as an important allocation for this area and the wider Northampton Borough, particularly as Northampton is expected to deliver a significant portion of the new jobs needed in West Northamptonshire, as set out in the Joint Core Strategy.

Emerging Policy 16 (Supporting new employment developments and schemes within and outside safeguarded sites) sets out that *‘new employment related developments within the safeguarded employment sites will be positively welcomed’*.

Equation Properties Limited welcomes this positive approach to the delivery of new employment related development, and in particular supports the Council’s aim to positively welcome new development which provides an appropriate strategy for delivering the required employment development across the plan period. This approach is in keeping with national planning policy which seeks to build a strong, competitive economy and which places significant weight on the need to support economic growth and productivity.

5 Emerging Allocation

The Northampton Local Plan (1997) allocated the Site at Water Tull Way under Policy D11 (Sixfields) for development with alternative or mixed-use land proposals. Whilst this policy was not 'saved' by the Secretary of State post 2007, it provides an indication that the Council considers the Site appropriate for redevelopment.

The NBC Land Availability Assessment (September 2017) assessed the Site for both employment and residential uses under reference LAA0594. This assessment concluded that the Site is achievable, developable, and suitable with no major physical or environmental constraints to overcome. In November 2017, a Sites Consultation took place, during which the Site was put forward as a 'site for further consideration'. The purpose of the Sites Consultation was to gather views on the potential future uses of sites to deliver the strategy and development required in the West Northamptonshire Joint Core Strategy, adopted in December 2014. The Site has now been considered as suitable for Employment Uses and been given a draft allocation for Employment Uses within the Regulation 19 (Submission Version).

The emerging allocation seeks to ensure that there is a sufficient supply of suitable employment land to facilitate the creation of new jobs, attract inward investment, and deliver economic prosperity to Northampton. This is a site with excellent potential to accommodate a successful Employment development and will contribute to delivering the growth that Northampton expects over the lifetime of the Local Plan. Equation Properties Limited strongly agrees with the Council's assessment of the Site and supports that the draft allocation as an Employment Site in the Regulation 19 version of the Northampton Local Plan.

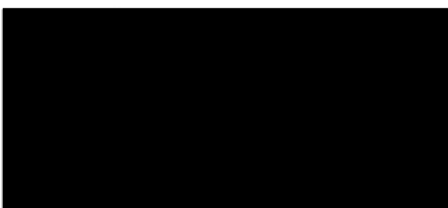
Conclusion

Equation Properties Limited is supportive of the vision and objections set out in the Northampton Local Plan Part 2 and considers that the Employment Policies referred to in this letter are justified, effective, prepared positively and will facilitate sustainable development in line with the requirements of the NPPF.

The allocation of the Site at Water Tull Way is justified as it is based on the results of the Land Availability Assessment and there is a clear need for additional Employment sites in Northampton. If the allocation is adopted, it will represent the most effective strategy for meeting employment development needs, by focusing development in an area which is suitable, available, and deliverable for employment development.

We trust this letter is of assistance and we would be grateful if you would keep us informed of the progress of the Northampton Local Plan Part 2. Should you have any questions, please do not hesitate to contact us.

Yours sincerely





Tim Rainbird
Director



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 official 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	c/o Agent	Mr
First name	c/o Agent	Tim
Last name	c/o Agent	Rainbird
Job title (where relevant)		Director
Organisation (where relevant)	Equation Properties	Quod
Address line 1	c/o Agent	Ingeni Building
Line 2		17 Broadwick Street
Line 3		
City / Town		London
County		
Postcode		W1F 0DE
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	X	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 attached representations.

3: Do you consider the Northampton Local Plan Part 2 to be sound?	Yes	X	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
Northampton Local Plan Part 2 Submission Version		15 and 16	Emerging Employment Allocation at Walter Tull Way

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 attached representations.

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	X	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)	X
When the report of any person appointed to carry out an independent examination of Northampton Local Plan Part 2 is published	X
When the Northampton Local Plan Part 2 has been adopted	X
Other (please specify)	

10: Signature	B Lambourne	Date	14 / 06 / 2019
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**Thank you for taking the time to complete the form.
Please return it to:**

Email: [REDACTED]

By post or by hand to: