

[REDACTED]

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**From:** Ross Middleton <[REDACTED]>  
**Sent:** 13 June 2019 16:59  
**To:** Planning Policy  
**Subject:** NLP2 DRAFT SUBMISSION (Clayson Country Homes - Land at Towcester Road and Land at Great Houghton)  
**Attachments:** Towcester Rd NLP2.pdf; Gt Houghton NLP2.pdf

Dear Sir / Madam,

On behalf of our client Clayson Country Homes, 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**

[REDACTED]

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Your ref:  
Our ref: RM/NLP2/GTHGT  
Direct ne:  
E ma :  
Date: 14<sup>th</sup> June 2019



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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: Former Great Houghton School Site.**

**Representations on behalf of Clayson Country Homes.**

CC Town Planning have been appointed by Clayson Country Homes ('the client') to provide town planning consultancy services in respect of their land and property holdings 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 ('LP2') for the Borough.

The enclosed seeks to respond to those relevant questions contained within 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.

Whilst the client has various land and property holdings within the Borough this submission is made in the context of their land interests at the former Great Houghton School site to the west of Great Houghton, Northampton which has been promoted by the client through NBC's Strategic Housing

Land Availability Assessment process and through representations at every stage of the NLP2's production.

As an established housebuilder of over 40 years our client has operated within Northamptonshire through both the strongest periods of growth and the most challenging of economic periods. 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. However, whilst the proposed approach is welcomed, it is considered that further provisions could be made within the emerging document to ensure a sustained and significant boost to the supply of land for housing within the 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.

Given the strength of the acknowledgement within Para 31 of the NLP2 which clearly states that 'Northampton has not been able to meet its 5 year housing land supply as required by the Government', it is considered that the number of proposed residential site allocations should be extended to include further opportunities to instil further flexibility in the plan to ensure that the vision and objectives of the LPA can be achieved whilst reducing reliance upon the urban area of Northampton.

To this end, it is considered that those proposed residential development allocations as set out within Policy 12 (discussed later) could be extended to include a variety of additional sites, including the client's land at the former Great Houghton School.

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 need 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 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 1<sup>st</sup> 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. Whilst the document does take significant steps in allocating land to meet this future housing requirement, it is considered that further land should be allocated in order to meet the increasing demand for housing over the plan period.

It is clear that there has been 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.

A potential additional site for inclusion and allocation through Policy 12 is the client's land at the former Great Houghton School site which lies to the east of the urban area of Northampton and adjacent to the existing settlement boundary (a site location plan is included for reference purposes).

A detailed contextual analysis of the site including an overview of its attributes as well as detailed justification of the site's sustainability is set out within the client's submission to the Call for Sites process and is set out within their letter dated 7<sup>th</sup> June 2016 (Ref: RM/N160)

It is however considered reasonable to conclude that the client's site presents a suitable, immediately available and achievable residential development opportunity that can accommodate several dwellings of all sizes types and tenures. It also provides a development opportunity which is sustainably located, but outside and detached from the urban area of Northampton, which will clearly serve to compliment the high concentration of urban development sites which are expected to come forward through many of those sites which Policy 12 seeks to allocate.

In terms of deliverability, and in the context of the Court of Appeal Decision (St Modwen v SSCLG & ERYC [2017] EWCA Civ 1643) which was handed down on 20th October 2017, it is considered that the site can deliver dwellings to the market within 5 years of the plans adoption and therefore could be assessed as deliverable through the site assessment process as confirmed within the aforestated decision.

Persuant to the above, and notwithstanding the client's comments made against the backdrop of their land holdings elsewhere in the Borough, namely site ref: 1025, Land West of Towcester Road, it is urged that Policy 12 be amended to include appropriate policy provision to enable their site at Great Houghton to be brought forward for residential development.

The site itself has been assessed by NBC as being capable of accommodating 240 dwellings and confirmed as being both available and achievable. At that stage however, the site was not considered suitable for development. In contrast, Site Ref: 1098, The Green Great Houghton, was deemed to be a suitable site for development and subsequently allocated within draft Policy 12. It is considered that the Council's conclusions in

respect of that site, are as applicable to the client's land and therefore it is requested that the content of Policy 12 be extended to include the delivery of 240 dwellings from the former Great Houghton School site to assist in the achievement of NBC's strategic housing growth targets over the plan period.

Finally, consideration has been afforded to **Appendix A** and the housing trajectory contained therein. The client welcomes the ambitious growth estimates set out within the document, however it is considered that should the above amendments be made to Policy 12 of the development plan, the associated housing trajectory will need to be amended accordingly.

There is a real appetite to develop the site and should the development plan contained policy provision to allow its future development, it is considered that the following housing trajectory could be achieved.

20/21	21/22	22/23	23/24	24/25	24/25	25/26
10	30	40	40	40	40	40

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.

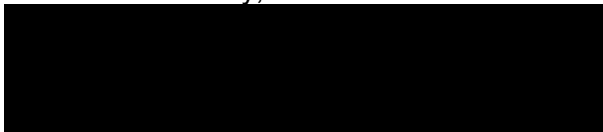
As stated herein and within previous submissions to the NLP2 process, our client's site presents an immediately available opportunity to deliver much needed residential development, in the short term, to assist in alleviating the acute housing land supply issues the Borough currently faces.



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.

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](http://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	Colin	Ross
Last name	Clayson	Middleton
Job title (where relevant)		Associate
Organisation (where relevant)	Clayson Country Homes	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.

<b>2: Do you consider the Northampton Local Plan Part 2 to be legally compliant?</b>	Yes	✓	No	
If <b>NO</b> , 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.**

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

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

**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 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**

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

### **HABITATS REGULATIONS ASSESSMENT**

<b>6. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number).</b>	
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?**

<b>No</b> , I do not wish to participate at the oral examination	✓	<b>Yes</b> , 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))**

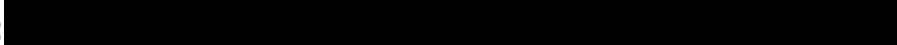
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**9: Please tick a box if you wish to be notified of further progress of the Local Plan Part 2 (please tick all that apply)**

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)	

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

**Email:** 

**By post or by hand to:**



Metres  
0 10 20 40 60 80 100

Scale: 1:2500

Great Houghton School



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Serial number: 1683730

Plot centre co-ordinates: 479014,259109  
Download file: Great Houghton  
Project name: Clayton