

[REDACTED]

From: Ross Middleton [REDACTED]
Sent: 13 June 2019 15:43
To: Planning Policy
Subject: NLP2 DRAFT SUBMISSION (Mr. D Oliver St. Clair Investments - Waterside Way)
Attachments: Waterside Way.pdf

Dear Sir / Madam,

On behalf of our client St. Clair Investments, 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]

CHECK OUT OUR NEW WEBSITE AT WWW.CCTOWNPLANNING.CO.UK



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

This message and any attachments are private and confidential and may be subject to legal privilege and copyright. If this message has been sent to you in error or you are not the intended addressee, you must destroy the original transmission and its contents.

Although this email and attachments are believed to be free from any virus or other defect which might affect any system into which they are received or upon which they are opened, the Company accepts no liability for any loss or damage arising from the receipt or use of this communication.

The Company may monitor traffic data and the content of email for lawful business purposes.

CC Town Planning Limited | Office Address: Newton House, Northampton Science Park, Kings Park Road, Northampton, NN3 6LG | Registered in England & Wales Company No 9729552 | Registered Address: Newton House, Northampton Science Park, Kings Park Road, Northampton, NN3 6LG | VAT No. 219570792

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



Newton House
Northampton Science Park
Kings Park Road
Moulton Park
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: 1101

Representations on behalf of St. Clair Investments.

CC Town Planning have been appointed by Mr. D Oliver of St. Clair Investments ('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 holding at Waterside Way, Northampton which has been designated reference 1101 within emerging

Policy 33: Development Allocations and the associated approach to the safeguarding of existing employment sites and new employment developments which are set out at Policies 15 and 16 respectively.

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 identifying the economic opportunities which are present within the Borough and opportunity to attract investment and building the attractiveness of the Borough by welcoming an increased diversity in employment opportunities.

The client welcomes the NLP2's vision which quite rightly seeks to ensure that the Borough is a great UK location for a range of employment opportunities and yet further seeks to build on its locational advantages including the Oxford to Cambridge corridor. It is considered that the client's site will play a key role in assisting in the achievement of the Council's vision and build on those objectives which are set out on page 29 and 30 of the NLP2.

It is considered that the NLP2, when ratified, will play a vital role in delivering economic growth and increased job opportunities in tandem with housing development, to both address those acute housing land supply issues which exist within Northampton Borough and to ensure an appropriate labour market supply.

When assessed against the reasonable alternatives it is considered that the NLP2 sets out a sound strategy to meet the economic growth objectives for the Borough through to 2029.

Chapter 8 of the document sets a reasonable and sound strategy to guide economic development within the Borough which acknowledges those existing strengths and identifies those opportunities which exist.

Para 147 quite rightly acknowledges that B-class floor space provides for a substantial amount of Northampton's employment. The paragraph also quite rightly acknowledges that a significant amount of employment comes from other uses. However, given the need for more traditional floor space, both as a result of the market and as a result of the need for the local economy to

reduce its reliance upon any single sector, the approach set out within Policies 15 and 16 is welcomed.

The client welcomes the content of Policy 15 and is refreshed to learn of the flexible approach to protecting existing employment sites for use within the office, general industrial and warehousing and distribution sectors whilst allowing alternative employment generating uses which are ancillary to or support the wider employment operations of the stated locations. Such an approach will ensure that those larger strategic scale sites are able to cope with change and adapt to the demands of the market as they change over the course of the plan period.

Whilst we welcome the thrust of bullet 2 within Policy 15, it is considered that the requirement of 12 months of marketing evidence to demonstrate that the use of a unit is no longer viable within a B-class use may be an appropriate timescale within the most buoyant of markets. However, it is considered that this approach could be flexibly worded to ensure that the period is responsive to macro-economic conditions to ensure that properties are not left with significant void periods during more challenging economic periods.

The content of Policy 16 is welcomed and it can be confirmed, on behalf of the client, that there is a real appetite to deliver an employment led proposal on their land holding within the wider Brackmills Industrial Estate which has been identified on the proposals map and correctly referenced within Policy 33.

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

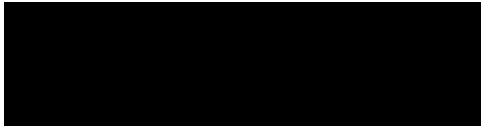
requested, the requisite representation form has been completed and is enclosed.

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.

Additionally, 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
Principal Planning Consultant



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 Investments	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		([REDACTED])
Email (if provided we will always contact you this way)		[REDACTED]

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	✓	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.

3: Do you consider the Northampton Local Plan Part 2 to be sound?	Yes	✓	No	
--	-----	---	----	--

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 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	
--	---	--	--

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))

--

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)

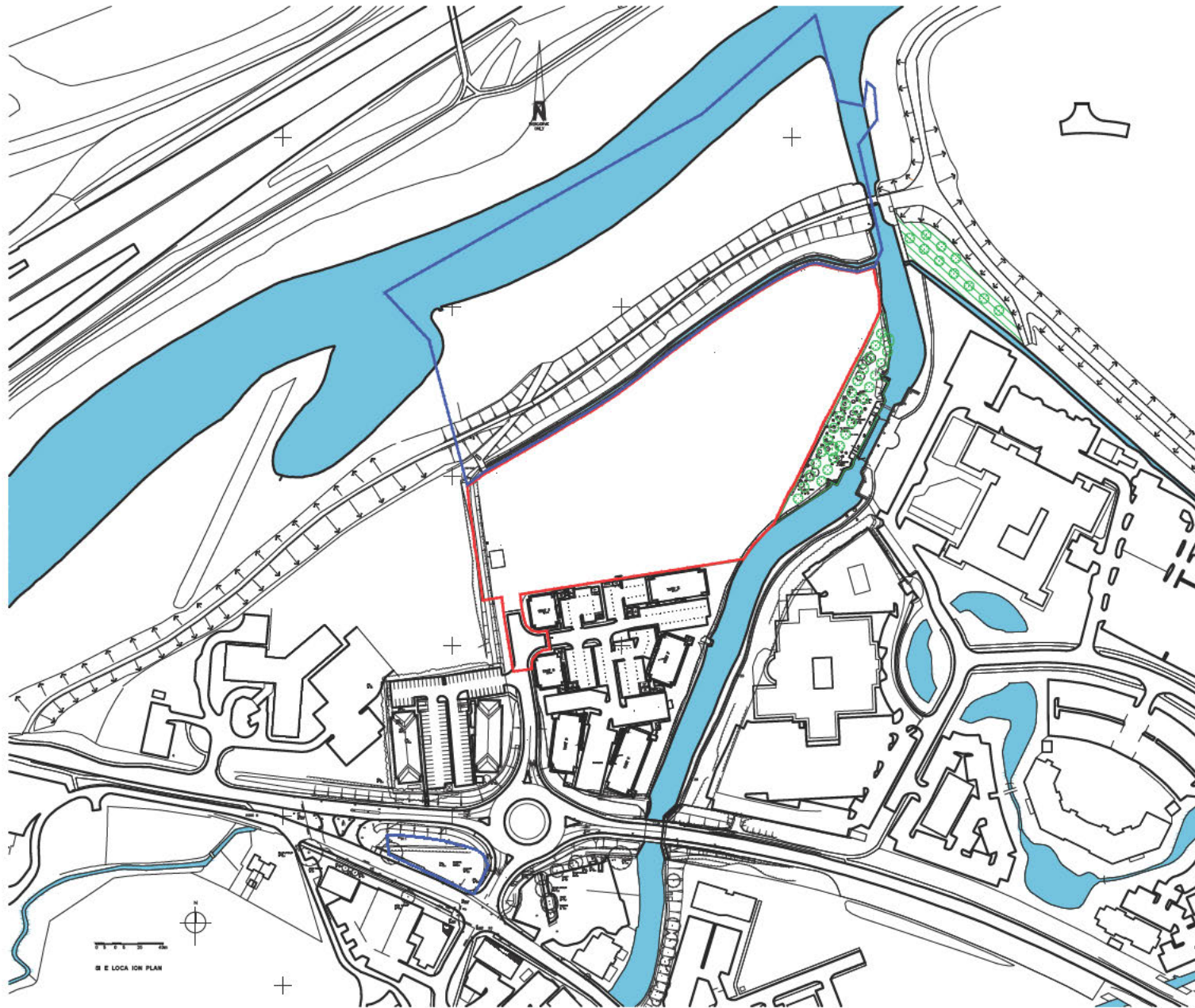
When the Northampton Local Plan Part 2 has been submitted for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended)	✓
When the report of any person appointed to carry out an independent examination of Northampton Local Plan Part 2 is published	✓
When the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

10: Signature		Date	14th June 2019
----------------------	---	-------------	----------------------------------

**Thank you for taking the time to complete the form.
Please return it to:**

Email: 

By post or by hand to:



CLIENT
St Clair Investments

DRAWING TITLE
Site Location Plan

DETAIL
Bedford Road
Northampton
Northamptonshire

SCALE
1:2500@A3

CHECKED BY
-