

Mike Burgess

From: Catherine Mason [REDACTED]
Sent: 13 June 2019 17:42
To: Planning Policy
Subject: Local Plan Part 2 - Submission Draft
Attachments: Reps Prop Sub Version 13 June 2019.pdf; FINAL_Representation_Form.pdf

Dear Sir or Madam,

On behalf of the University of Northampton, please find attached representations in respect of the above consultation.

I would be grateful if you could confirm receipt of this email and attachments.

Please do not hesitate to contact me should you have any queries.

Thanks,

Kind regards,

Catherine

Catherine Mason BA (Hons) MA MRTPI
Associate Director
Planning

Savills, 33 Margaret Street, London W1G 0JD



Tel [REDACTED]
Mobile [REDACTED]
Email [REDACTED]
Website : www.savills.co.uk



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Mike Burgess

From: Catherine Mason [REDACTED]
Sent: 13 June 2019 17:48
To: Planning Policy
Subject: RE: Local Plan Part 2 - Submission Draft
Attachments: C236-LUC-00-00-DR-L-0001-S2-P8.pdf

Dear Sir or Madam,

Following submission of the email below, please find enclosed masterplan referred to in the representations.

I would be grateful if you could confirm receipt of this email.

Thanks,

Kind regards,

Catherine

Catherine Mason BA (Hons) MA MRTPI
Associate Director
Planning

Savills, 33 Margaret Street, London W1G 0JD



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From: Catherine Mason
Sent: 13 June 2019 17:42
To: 'planningpolicy@northampton.gov.uk' <planningpolicy@northampton.gov.uk>
Subject: Local Plan Part 2 - Submission Draft

Dear Sir or Madam,

On behalf of the University of Northampton, please find attached representations in respect of the above consultation.

I would be grateful if you could confirm receipt of this email and attachments.

Please do not hesitate to contact me should you have any queries.

Thanks,

Kind regards,

Catherine

Catherine Mason BA (Hons) MA MRTPI
Associate Director

Planning

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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		Miss
First name		Catherine
Last name		Mason
Job title (where relevant)		Associate Director
Organisation (where relevant)	University of Northampton	Savills
Address line 1		33 Margaret Street
Line 2		
Line 3		
City / Town		London
County		
Postcode		W1G 0JD
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	<input type="checkbox"/>
If NO , is this because it is: (please tick all that you think apply)				
Not prepared in accordance with the Local Development Scheme				<input type="checkbox"/>
Not prepared in accordance with the Statement of Community Involvement				<input type="checkbox"/>
Not consistent with the regulatory requirements for consultation				<input type="checkbox"/>
Not compliant with the duty to cooperate				<input type="checkbox"/>
Not accompanied by a compliant Sustainability Appraisal				<input type="checkbox"/>

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	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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3 (1): If NO, is this because it is: (please tick all that you think apply)	
Not positively prepared	<input type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input checked="" type="checkbox"/>
Not consistent with national policy	<input type="checkbox"/>

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
		9	

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 supporting 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))

We reserve the right to be heard at the Examination in order to fully explain our concerns to the Inspector.

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	13/06/2019
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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:
Northampton Borough Council

Electronic Submission



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

Catherine Mason
E: [REDACTED]
DL: [REDACTED]
33 Margaret Street W1G 0JD
T: [REDACTED]
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savills.com

Dear Sir or Madam,

Northampton Local Plan Part 2 – Submission Draft

On behalf of my client the University of Northampton, I write to make representations in relation to the above document.

The University fully supports allocation of Park and Avenue Campuses for residential redevelopment (800 and 200 homes respectively) under emerging Policies 12 and 33. The University has now relocated to its new Waterside Campus. The University agrees that residential is the most appropriate and viable future use for the sites. Indeed, Park Campus has outline permission for the development of up to 800 homes and the initial phase is under construction. An application for residential development of Avenue Campus is with the Council for consideration.

Our comments / objections relate to emerging Policy 9 of the Submission document and are set out below.

Policy 9 Supporting and Safeguarding the University of Northampton Waterside Campus

Paragraph 16 of the NPPF (2019) states:

'Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;*
- b) be prepared positively, in a way that is aspirational but deliverable;*
- c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).'*

Paragraph 35 of the NPPF states:

'Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹⁹; 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.’

Northampton Local Plan Part 2 Submission Draft Policy 9 states:

‘The role and contribution of Northampton University will be supported through the safeguarding of the site for education purposes. Any enhancements to the existing facilities, and improved connectivity to the town centre, will be welcomed provided the schemes meet the design and sustainable construction requirements of this Plan.’

Outline planning permission was granted on 12 September 2014 for:

‘Redevelopment of the site as a new campus for the University of Northampton, including site clearance and enabling works comprising remediation and re-leveling of the site, demolition of all buildings on the site (except the Grade II listed structures). The proposal includes up to 40,000m² university floorspace (all floorspace is GEA); up to 15,000m² university expansion floorspace; up to 35,000m² commercial (B1) floorspace; up to 3,550m² of retail floorspace (up to 1800m² of A1, up to 150m² of A2, and up to 1600m² A3/A4); up to 1,500 beds of student accommodation; up to 760 car parking spaces for University use; up to 1,100 car parking spaces for commercial / leisure use; a hotel of up to 7,000m² (up to 150 bedrooms); floodlit sports facilities; reuse of listed locomotive shed (520m²) and curtilage listed office building; an energy centre of up to 600m²; a new road bridge and junction on to Bedford Road including reconfiguration of Midsummer Meadow car park; a new pedestrian foot bridge connecting the site to Becket’s Park; a new secondary substation (adjacent to existing substation); and retention of the existing access via Nunn Mills Road.’

The campus opened on schedule in September 2018.

Reference in the policy to supporting and safeguarding the role and contribution of the University of Northampton is welcomed. However, we have some concerns about potential unintended consequences arising from the wording of the policy as set out below.

The emerging Policy Map for the Local Plan Part 2 shows the boundary for the Waterside Campus as going round the entire site which was the subject of the outline permission referred to above. As shown above, the outline permission (N/2013/912) included up to 35,000 sq. m commercial B1 floorspace on the north eastern part of the site (see enclosed masterplan). As currently worded, the policy does not reflect this as it safeguards the entire site for education purposes. In order to avoid ambiguity moving forward, the Policy should also make reference to the commercial floorspace approved under the outline permission. This will ensure that the policy is ‘clearly written and unambiguous’ in accordance with paragraph 16 of the NPPF.

The policy should also refer to ancillary uses alongside education uses. This will ensure that the policy is flexible in the event that any ancillary uses are proposed, such as retail, restaurants or healthcare.

The following revised wording is therefore proposed in order to ensure flexibility moving forward and ensure that the plan is justified and effective in accordance with the NPPF:

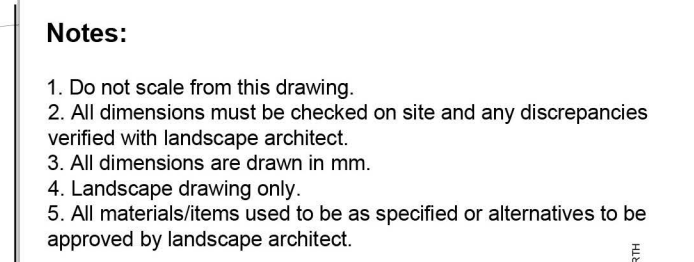
‘The role and contribution of Northampton University will be supported through the safeguarding of the site for education and ancillary purposes. Any enhancements to the existing facilities, and improved connectivity to the town centre, will be welcomed provided the schemes meet the design and sustainable construction requirements of this Plan. Under the outline planning permission, there is approval for up to 35,000 sq. m of commercial (B1) floorspace on the north eastern part of the site.’

The proposed amendments are required in order to ensure that the plan is justified and effective in line with the NPPF and guidance in the PPG.

Yours sincerely



Catherine Mason
Associate Director



P8	30.10.14	Reserved Matters application	JB	AJ	RH		
P7	20.10.14	Stage 3 Draft	JB	EP	RH		
P6	19.09.14	Utilities buildings added	JB	EP	RH		
P5	05.09.14	VE amendments	JB	EP	RH		
P4	18.07.14	layout amended following building VE	JB	EP	RH		
P3	15.07.14	Minor annotation amendment	JB	EP	RH		
P2	03.07.14	Minor annotation amendment	JB	EP	RH		
P1	26.06.14	First Issue	JB	EP	RH		
155	Date	Issue Notes				Drawn By	Checked By

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LONDON NW1 1JD
T: 020 7383 5784
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Project	University of Northampton Waterside
Client	University of Northampton
Title	General Arrangement Landscape Masterplan

Scale 1:1250@A1	Job No. 5695
Project No. C236	Drawing No. LUC-00-00-DR-L-0001
Status S2	Issue P8

Do not scale from this drawing
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