

[REDACTED]

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**From:** Matt Smith (Linden Homes) [REDACTED]  
**Sent:** 13 June 2019 08:59  
**To:** Planning Policy  
**Subject:** NLP2 SUBMISSION DRAFT - Shoo22  
**Attachments:** Local Plan Representations Proforma - Shoo22.pdf; Pre-Submission Local Plan Representations - Shoo22.pdf

Dear Sir/Madam,

Please find attached representations to the Pre-Submission Local Plan Part 2 prepared on behalf of Shoo22.

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

Kind regards

Matt

Matt Smith Strategic Land and  
Planning Manager

Tel: [REDACTED]  
Mob: [REDACTED]

Linden Homes Strategic Land  
Linden Homes Midlands  
Ashurst, Southgate Park  
Bakewell Road  
Orton Southgate Peterborough, PE2 6YS  
<http://www.lindenhomes.co.uk>



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PE2 6YS

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4 June 2019

Dear Sir / Madam,

**Re: Land to the East of Towcester Road, Northampton (site ref: 1102)**

This representation, and the accompanying submission pro-forma, has been prepared on behalf of Shoo22 Limited in respect of land to the east of Towcester Road, Northampton, referred to in the Pre-Submission Northampton Local Plan Part 2 as allocation ref: 1102.

Shoo22 Limited predominately comprises of Duncan Investments Limited and Linden Homes (a national housebuilder), who are actively promoting the site for development through the Local Plan process. As such, the proposed allocation of the site in the Local Plan Part 2 is fully supported by Shoo22.

It is acknowledged in the Local Plan Part 2 that delivery of the housing requirement set out within the Joint Core Strategy (JCS) has been challenging due to the slow progress in bringing forward the SUE's that formed a central part of the spatial strategy (paragraphs 116-118 refers). As a result, there is a significant shortfall in housing delivery across the Borough when assessed against the JCS housing requirement; 1,475 dwellings at April 2018 (an average shortfall of 210 dwellings per annum).

In view of this, the Council's approach in the Local Plan Part 2 to allocate additional land for development to ensure the housing requirement set out in the JCS is delivered in the plan period is fully supported by Shoo22. It is only by allocating additional land, which is deliverable in the short term, that the current shortfall can be addressed over the course of the plan period. Allocating a range of smaller sites provides the flexibility the Council needs in its housing supply to ensure a five year housing land supply position can be demonstrated; and that housing delivery can keep pace (and catch up) with the annual requirement.

Policy 12 'Housing and Other Housing Led Allocation' and Policy 33 'Development Allocations' set out the various sites for allocation in the Local Plan Part 2. Land east of Towcester Road (ref: 1102) is listed as an allocation, which is fully supported by Shoo22; as is the reference to a dwelling capacity of 50, as stated in Policy 12. It is considered 50 dwellings can be accommodated on the site which will be provided through a range of house types, sizes and tenures alongside an appropriate level of affordable housing. The proposed site yield takes account of the necessary noise buffer from the railway line to the east and the need for the scheme to respond positively and sensitively to the landscape and surrounding land uses. Supporting technical and Masterplanning work is currently being prepared to inform the preparation of a future planning application and would be available in advance of the Local Plan Part 2 Examination.

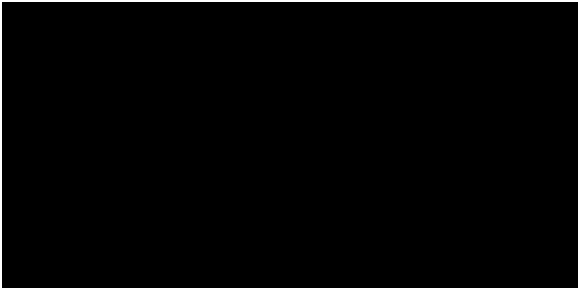
Appendix A sets out the housing trajectory for the proposed allocations with first completions for land east of Towcester Road programmed for 2022/23. It is considered this is a realistic timescale for development on the site. As set out above, technical work to support a planning application is currently being prepared with a view to beginning formal pre-application discussions later in 2019, followed by the submission of a planning application in 2020. The site is being promoted by Shoo22, which includes the national housebuilder Linden Homes. As such, the site has developer interest and is considered to be deliverable in the short term.

Land east of Towcester Road represents an achievable, suitable and deliverable site for residential development to meet the Borough's housing requirements, therefore, its allocation is fully supported, as set out in the above representation.

Should you have any queries in respect of this representation, please do not hesitate to contact me.

Alternatively, I look forward to receiving your written confirmation of the representation to the Local Plan Part 2.

Yours sincerely,



**Matt Smith**  
**Strategic Land and Planning Manager**  
**Linden Homes Strategic Land**  
E: 



## **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.

☐

x

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**

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### 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):

N/A

*\*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	
First name	Matt	
Last name	Smith	
Job title (where relevant)	Strategic Land and Planning Manager	
Organisation	Linden Homes	
Address line 1	Ashurst	
Line 2	Southgate Park	
Line 3	Bakewell Road	
City / Town	Peterborough	
County		
Postcode	PE2 6YS	
Telephone number		
Email		



## 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.**

Please see enclosed letter.

<b>3: Do you consider the Northampton Local Plan Part 2 to be sound?</b>	Yes	×	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	

<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>
	N/A	Policy 12, Policy 33, Appendix A	N/A

**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 enclosed 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**

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

#### **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	N/A
Comments	N/A

**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))**

Our site at land east of Towcester Road is allocated in the Local Plan Part 2 and forms part of the Council's housing trajectory. Attendance required to address any potential matters and issues arising for the allocation of this land.

**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>	M Smith	<b>Date</b>	04/06/2019
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**Thank you for taking the time to complete the form.  
Please return it to:**

**Email:** [REDACTED]