

[REDACTED]

From: Mark White <[REDACTED]>
Sent: 12 June 2019 10:14
To: Planning Policy
Subject: Submission Draft Consultation
Attachments: FINAL_Representation_Form NBC Homes England.docx; NBC Policy 3.docx; NBC Policy 12.docx; NBC Policy 36.docx; NBC Policy 38.docx; NBC Appendix A.docx; Northampton.pdf

Importance: High

Dear Sirs

NORTHAMPTON LOCAL PLAN PART2 SUBMISSION DRAFT CONSULTATION

COMMENTS FROM HOMES ENGLAND

Please find attached completed response forms detailing our representations on the above consultation relating to Homes England's landholdings in Northampton; our landholdings are shown on the attached plan.

Please do not hesitate to contact us should you have any queries on our comments. We are happy to meet to discuss further.

I would be grateful if you could acknowledge receipt.

I look forward to hearing from you.

Yours faithfully

Mark White

Homes England is the trading name of the Homes and Communities Agency. Our address for service of legal documents is Arpley House, 110 Birchwood Boulevard, Birchwood, Warrington, WA3 7QH. VAT no: 941 6200 50. Unless expressly agreed in writing, Homes England accepts no liability to any persons in respect of the contents of this email or attachments.

Please forward any Freedom of Information Requests to: [REDACTED]

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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):

Government Agency

**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	Mark	
Last name	White	
Job title (where relevant)	Specialist - Planning	
Organisation (where relevant)	Homes England	
Address line 1	Woodlands	
Line 2	Manton Lane	
Line 3		
City / Town	Bedford	
County		

Postcode	MK41 7LW	
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		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 separate sheets for each representation

3: Do you consider the Northampton Local Plan Part 2 to be sound?	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	√

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

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 separate sheets for each representation

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))

Homes England exists to accelerate the delivery of housing across England; we are a national agency and non-department public body, sponsored by the Ministry of Housing, Communities and Local Government.

Part of the way we do this is through unlocking public and private land. Specifically in Northampton we have extensive landholdings; two of these sites are amongst the largest site allocations in the Northampton Local Plan Part 2 Submission Draft; three of the eight Sustainable Urban Extensions in the Northampton related Development Area include Homes England land.

Homes England is a key partner for delivery of the Northampton Local Plan.

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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)	<input checked="" type="checkbox"/>
When the report of any person appointed to carry out an independent examination of Northampton Local Plan Part 2 is published	<input checked="" type="checkbox"/>
When the Northampton Local Plan Part 2 has been adopted	<input checked="" type="checkbox"/>
Other (please specify)	

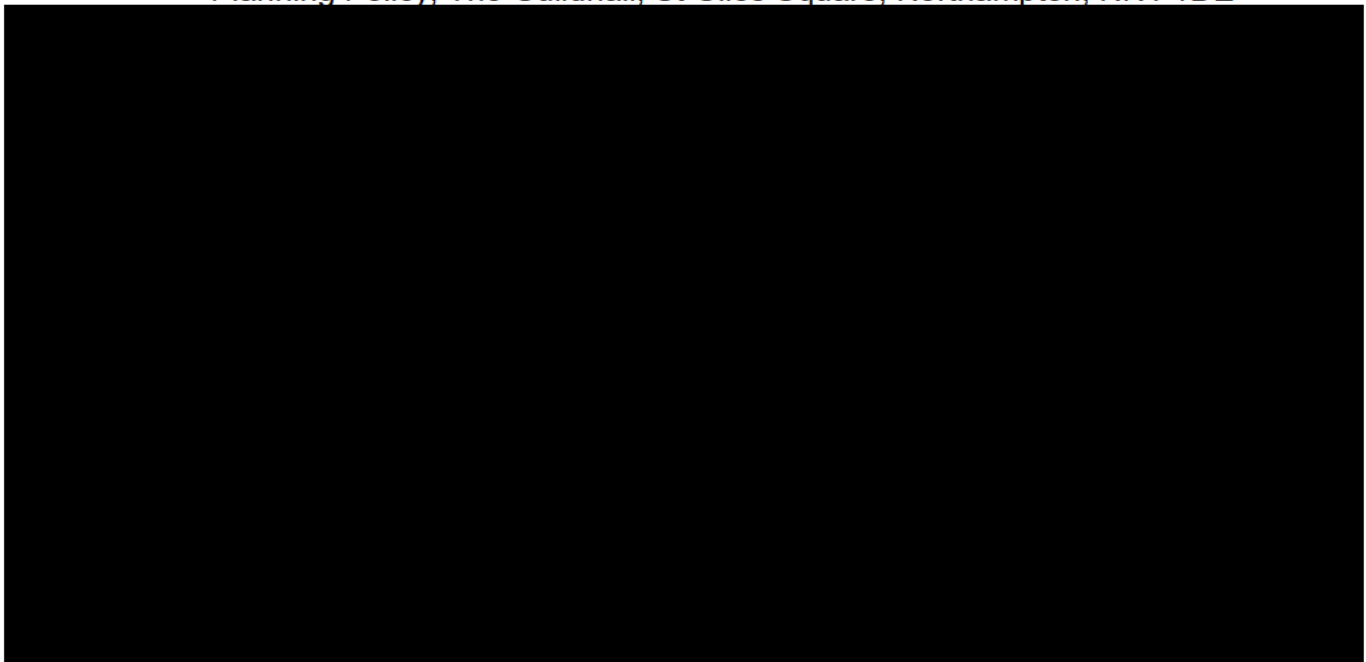
10: Signature	Mark White	Date	13th June 2019
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**Thank you for taking the time to complete the form.
Please return it to:**

Email:

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By **post** or by **hand** to:
Northampton Borough Council
Planning Policy, The Guildhall, St Giles Square, Northampton, NN1 1DE



4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
	81	3	

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.

Homes England's Strategic Plan commits the Agency to improving design quality through the use of Building for Life 12 (BfL12) and other tools. Homes England welcomes the references to BfL12 at Paragraph 81 and within Policy 3 Design.

As currently drafted, the policy and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design expectations, and how these will be tested (NPPF 2018, Paragraph 124).

The supporting text at Paragraph 81 describes Building for Life as a national standard for well-designed homes and neighbourhoods. However it is actually a design tool designed to help structure discussions about proposed new residential development. Whilst the requirement in Policy 3 Design that new developments should be designed to perform positively against Building for Life (or successor advice) criteria is welcomed, Policy 3 design and supporting text needs to specify what positive performance means, and the policy and supporting text should be revised as such.

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.

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
		12, 33	

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.

Homes England are taking forward landholdings throughout Northampton and welcome the following sites' allocation for housing and / or housing led development in Policy 12 Housing and Other Housing Led Allocation and Policy 33 Development Allocations.

Ransome Road Gateway
Gate Lodge
The Green, Great Houghton
Upton Park (Upton Reserve Site)
Ransome Road

Homes England have undertaken work on indicative site capacity of these sites which indicate that the Dwelling Capacity in Policy 12 for a number of these sites is incorrect. As such Homes England objects to the wording of Policy 12 as currently drafted. Please see our more detailed comments on Site Specific Policies 36 & 38 for Refs 1098 & 1138.

For Ref 0174 Ransome Road Gateway, Policy 12 as drafted suggests a dwellings capacity of 6 dwellings. Homes England's capacity work undertaken so far suggests a capacity of at least 24 dwellings. This figure could be higher with a flatted scheme which with a feature building and retail on ground floor.

One of the sites is named incorrectly; Upton Reserve Site does not form part of the Upton Park SUE and the relevant policies should be changed accordingly.

As currently drafted, the policy is too prescriptive and does not meet the test of soundness by failing to plan positively by artificially limiting sites' capacity and their ability to contribute to meeting the area's objectively assessed needs. The policy is inconsistent with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2018, Paragraph 11).

Homes England therefore requests the following changes to Policy 12 and Policy 33 to make the Plan sound.

Ref	Location	Dwelling Capacity
0174	Ransome Road Gateway	6 24

1098	The Green, Great Houghton	774 <u>800</u>
1099	Upton <u>Park</u> (Upton Reserve Site)	40
1138	Ransome Road	250 <u>500</u> (5 YR HLS)

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.

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
		36	

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.

Homes England intend to undertake technical studies of their landholding at The Green, Great Houghton to support the submission of an outline planning application for residential development. Homes England support the principle of development coming forward at this site and welcome the site's allocation in the Submission Draft Local Plan Part 2 as a Housing Allocation; Site Policy 36 The Green, Great Houghton; and on the Policies Map.

Homes England's technical assessment of the site's capacity will include the determination of the extent and location of ecological enhancements needed to secure a net increase in biodiversity and include determination of the location of built development take into account and be sensitive to the significance and the setting of the Great Houghton conservation area and listed buildings there, as reference in Paragraph 225.

In advance of detailed technical assessment, the location and extent of ecological enhancement and the location of built development cannot be determined and specifying their location and extent restricts flexibility in taking the site forward. As such Homes England objects to the wording of Policy 36 as currently drafted and to the diagram shown in Figure 18.

As currently drafted, the policy and diagram are too prescriptive and do not meet the test of soundness through inconsistency with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2018, Paragraph 11).

Homes England therefore requests the following changes to Policy 36 and the diagram shown in Figure 18 to make the Plan sound.

POLICY 36
THE GREEN, GREAT HOUGHTON (LAA1098)

Housing development of up to 800 dwellings, subject to analysis of capacity, which comply with the development principles shown on Figure 18 will be supported, subject to further technical assessment, the following criteria being met:

- ☐ ~~The built development should only take place outside of the area shaded green in the diagram~~
- ☐ The scheme should be of high quality design, and must take into account and be sensitive to the significance and the setting of the Great Houghton conservation area, evident through a Heritage Impact Assessment
- ☐ A buffer is to be created, in the form of ecological enhancements and net increase in biodiversity within the area of search shaded green in the diagram
- ☐ The development provides suitable transport links to neighbouring developments, including neighbourhood centres and community facilities
- ☐ The proposal should include pedestrian and cycling provision to secure connectivity and permeability within the site and improved connections to the employment area to the north and the proposed residential areas to the west
- ☐ Development on this site should maximise the use of Sustainable Drainage Systems (SuDS).
- ☐ The layout of the development should be designed to take into account existing sewers and water mains within the site.
- ☐ Any proposal that comes forward should include suitable measures to mitigate the impact of additional traffic generated by the development.

FIGURE 18
DEVELOPMENT PRINCIPLES FOR LAND AT THE GREEN, GREAT HOUGHTON

The reference to Ecological enhancement should be revised to read 'Area of search for Ecological enhancement'

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.

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
		38	

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.

Homes England are engaged with a developer to take forward our landholding at Ransome Road and support the principle of development coming forward at this site and welcome the site's allocation in the Submission Draft Local Plan Part 2 as a Housing Allocation; Site Policy 38 Ransome Road; and on the Policies Map.

Homes England's current engagement with its development partner involves a technical assessment of the site's capacity including determination of the extent of remediation needed to address the areas referred to in Paragraph 231 of the Draft Plan and maximise the site's capacity.

The work undertaken so far indicates that the site has a capacity of at least 500 homes and that the need for the bus route is unproven. In advance of detailed technical assessment, the location of green space and associated footpaths cannot be determined and specifying their location and extent restricts flexibility in taking the site forward. As such Homes England objects to the wording of Policy 38 as currently drafted and to the diagram shown in Figure 20.

As currently drafted, the policy and diagram are too prescriptive and do not meet the test of soundness by failing to plan positively by artificially limiting the site's capacity and its ability to contribute to meeting the area's objectively assessed needs. The policy and diagram are inconsistent with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2018, Paragraph 11).

Homes England therefore requests the following changes to Policy 38 and the diagram shown in Figure 20 to make the Plan sound.

POLICY 38

RANSOME ROAD

Ransome Road will be developed for ~~at least up to~~ **500**~~250~~ dwellings, subject to analysis of capacity in a manner which is consistent with the diagram shown in Figure 20. Proposals need to include the following:

☐ ~~Generally be~~ **Be** two to four storeys in height, with ~~opportunities for~~ taller buildings facing along the principal movement routes and the northern section of the site

☐ ~~Bus-only route to be provided, connecting Bedford Road to London Road via University Drive, designed specifically to discourage private vehicle traffic from the wider primary distributor network accessing and adversely impacting on the predominantly residential character of the site~~

☐ Deliver a strategic green space corridor with associated footpaths to effectively link the site to Becket's Park and Delapre Park. Suitable access to Delapre Lake and Delapre Abbey and Park from Ransome Road is encouraged

☐ Respect the historic integrity and significance of on-site and nearby heritage assets. Appropriately address the site's location within and adjacent to the registered battlefield of the Battle of Northampton and also make an appropriate contribution to supporting its interpretation to the local area

☐ Incorporate appropriate measures to mitigate against flood risk both within the area and downstream of the sites, particularly taking account of the role of Hardingstone Dyke and residual risk associated with River Nene fluvial flood defences

The layout of any development should be designed to take into account existing sewers and water mains within the site.

Subject to detailed assessment, development on this site should maximise the use of Sustainable Drainage Systems (SuDS).

FIGURE 20 DEVELOPMENT PRINCIPLES FOR RANSOME ROAD

The Public transport link should be deleted from Figure 20 as should the Green corridor. The reference to Pedestrian improvement should be revised to read 'Potential pedestrian improvement (indicative).'

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.

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

Homes England welcomes the inclusion of the following sites in Appendix A Trajectory for sites allocated in the Local Plan Part 2.

Ref 0174 Ransome Road Gateway

Ref 1097 Gate Lodge

Ref 1098 The Green, Great Houghton

Ref 1099 Upton Park (Upton Reserve Site)

Ref 1139 Merge Homes England plots in Ransome Road

As currently drafted, for three of these sites, Appendix A is too prescriptive, and does not meet the test of soundness through inconsistency with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2018, Paragraph 11).

The trajectories for the sites at Ransome Road; Refs 0174 and 1139 should be modified in line with the comments we have made on Policies 12 and 38 with regard to the Dwelling Capacity of these sites.

The trajectory for the site at The Green, Great Houghton should be modified in line with the comments made on Policies 12 and 36 with regard to the Dwelling Capacity of the site and the first year of completions; this being expected towards the end of the first five years of the plan, with an expected delivery rate of 50 dwellings completed per annum for the first two years then up to 100 dwellings completed per annum with two sales outlets.

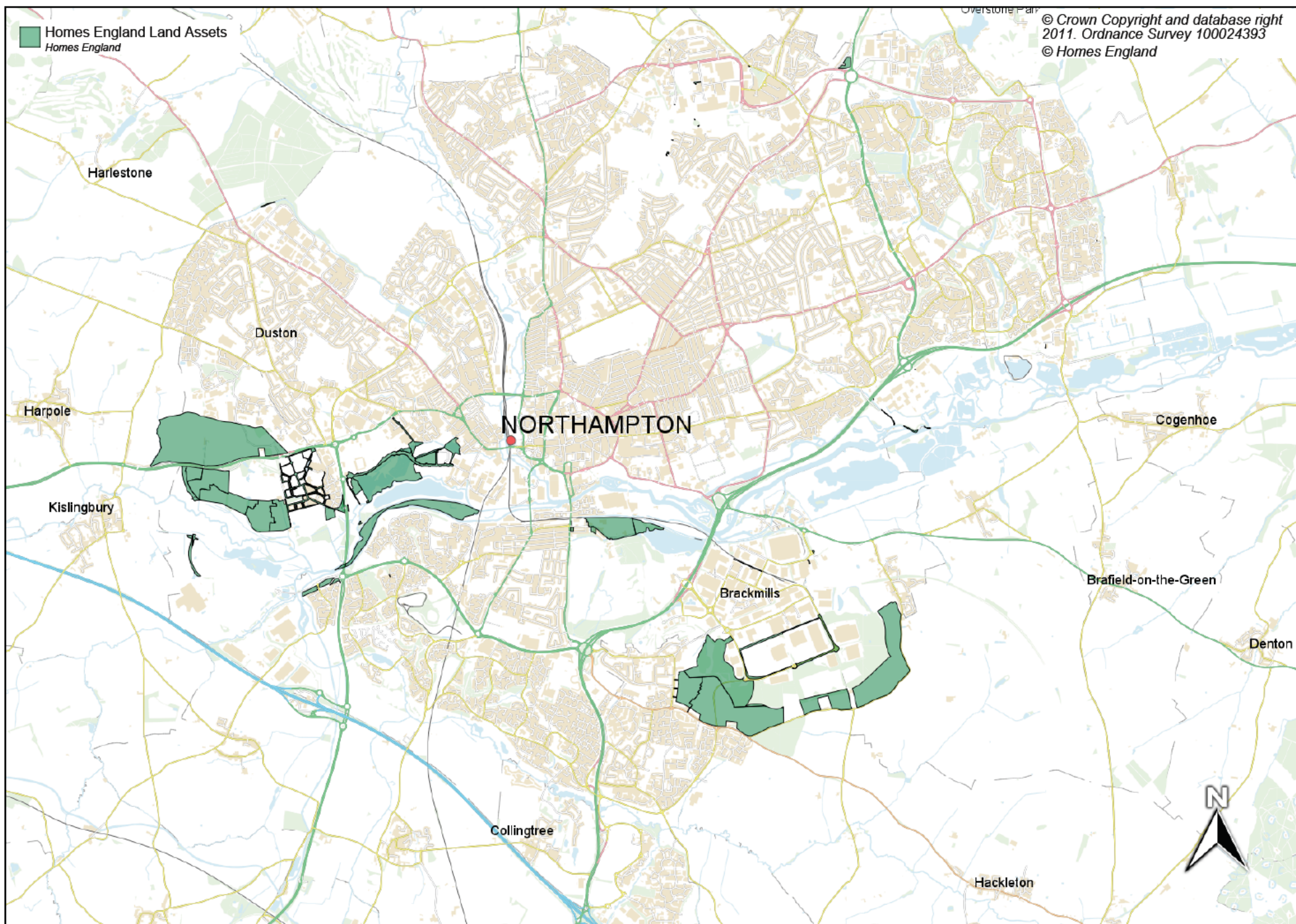
One of the sites is named incorrectly; Upton Reserve Site does not form part of the Upton Park SUE and the relevant policies should be changed accordingly.

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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.

Homes England Land Assets
Homes England

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Northampton



Homes England