Planning Policy

Please find attached representations sent on behalf of Roxhill Developments Ltd to the Local Plan Part 2 document together with the completed form and accompanying location plan.

Could you kindly acknowledge receipt.

Thank you.

Regards

Sent on behalf of
Elanor Wright
REPRESENTATIONS MADE TO THE NORTHAMPTON BOROUGH COUNCIL LOCAL PLAN PART 2 ISSUES AND OPTIONS CONSULTATION

Please find set out below and on the attached form representations to the Northampton Borough Council Local Plan Part 2 Issues and Options Consultation.

These representations relate solely to the economic development of the Borough and address the issues outlined in questions 7, 8 and 9 of the Council's comments form.

These representations are made by Oxalis Planning on behalf of Roxhill Developments Ltd.

Employment Land

The West Northamptonshire Joint Core Strategy (JCS) sets the target to deliver 28,500 jobs in the West Northamptonshire area and, as the Local Plan Part 2 Issues document states, the majority of these are to be provided in Northampton. This is a positive and ambitious target for jobs growth and the Local Plan Part 2 should reflect this ambition and overall objective in its economic policies.

Northampton Borough is ideally and strategically situated in the country and its prime location has ensured that Northampton is extremely attractive to businesses and developers. As a result, there is strong demand for employment space in the Northampton area, which is anticipated to continue. However, space is in short supply and the Borough's administrative boundary is a significant constraint on development opportunities.

It is evident that the Council will struggle to find enough land to accommodate the employment development needs of the area. In this situation the Duty to Cooperate directs that adjacent Local Planning Authorities should seek to help accommodate unmet needs within their boundaries. The logical approach is for any unmet development requirements to be met as close as possible to where the need arises. Northampton Borough Council and its neighbouring authorities should embrace the Duty to Cooperate to ensure that development which the Borough cannot provide itself is met within adjacent authority's boundaries, but as close to Northampton Borough as possible.

In this constrained context it is therefore vital that the Local Plan Part 2 maximises the opportunities existing within Northampton Borough's own boundary through allocating sites for employment development and seeking to smooth the road for employment applications which are in sustainable locations, to ensure that the Borough can meet demand, which in many cases currently outstrips supply. The proposal in the Issues document to incorporate areas where Local Development Orders negate the need for planning applications for employment development is a welcome and positive step forward.

The JCS Policy S1: Distribution of Development states that new development “will be concentrated primarily in and adjoining the principal urban area of Northampton”; the JCS is correct to direct development to this broad area. However, with regard to employment development, and specifically for medium to large size units (i.e. units from around 30,000 sq ft to 100,000 sq ft plus), connectivity is a crucial element which must be considered in the preparation of economic policies and the allocation of employment sites through the Local Plan Part 2.

In this regard the Council should look to successful examples of employment sites, such as the Brackmills Industrial Estate to maximise development opportunity. Brackmills is a thriving industrial estate, which is particularly well located to the strategic road network and which is also on the urban edge of Northampton. However, the extent of the Brackmills estate, as identified in the Council’s Local Plan from 1997 (Policy B7 Building Height Zones) is now reaching capacity. The emerging Local Plan Part 2 should seek to maximise the opportunity that Brackmills can offer and this should include extending the estate, through allocating the adjacent area for employment development.
A planning application (N/2016/0412) for employment development to the south of the Brackmills Industrial Estate, off Liliput Road, is currently with the Council, pending determination. The site subject to the application should be regarded as a sustainable and sensible opportunity to extend the Brackmills estate (through allocation) and to provide a strong and defensible boundary between the estate and the village of Great Houghton in the long term.

The National Planning Policy Framework (NPPF) states that the Government "is committed to ensuring that the planning system does everything it can to support sustainable economic growth" and that planning "should act to encourage and not act as an impediment to sustainable growth". Therefore, in order to accord with the NPPF, the Local Plan Part 2 needs to ensure that its economic policies enable sustainable development to be delivered to support the development and economic needs of the area.

The NPPF states that sustainable development comprises three dimensions, these are: an economic role; a social role; and an environmental role. With regard to the economic dimension, paragraph 7 of the NPPF states that this should contribute "to building a strong and competitive economy, by ensuring that sufficient land of the right type is available in the right places at the right time to support growth and innovation."

The land identified in planning application N/2016/0412 fits this national context also: it is well connected to, and could be seamlessly integrated into, the successful Brackmills Industrial Estate; the site lends itself well to the sort of warehouse and distribution development proposed; and the land is available for development now.

**What Development at Land South of Brackmills Industrial Estate Could Deliver**

Development at land south of Bedford Road, off Liliput Road, adjacent to Brackmills Industrial Estate could accommodate up to 528,485 sq ft of B8 employment space. This could be split between two units: one larger unit of approximately 400,503 sq ft and a smaller unit of approximately 127,982 sq ft.

The description of development for the planning application currently with the Council is:

"Demolition of farmhouse, associated buildings and the residential property of ‘Little Norway’. Construction of two warehouse and distribution units (Use Class B8) with ancillary office accommodation, together with earthworks, access, service yards, parking arrangements, landscaping and other associated infrastructure including creation of footpath."

The proposed scheme would satisfy the aspirations of the JCS and the emerging aspirations of the Local Plan Part 2 through providing development which would help strengthen and diversify the Northampton economy. As part of the application, the applicant has identified that there is no development land immediately available in the town for an occupier needing a freehold building; the proposed development could help meet this need.

The site presents the opportunity to create a development which seamlessly integrates into the Brackmills Industrial Estate. A significant area of public open space is provided in the development proposals, which is proposed to be handed over the Parish or Borough Council for their guardianship and to form an extension to the Brackmills Country Park. This would provide a strong and permanently defensible buffer between the nearby village of Great Houghton and the industrial estate. The substantial planting and bunding included in the landscaping proposals would also help to significantly screen the development from view.
Conclusion

The Local Plan Part 2 needs to ensure that land of the right type, in the right place is available at the right time to support economic development, in line with the NPPF.

However, it is clear that the Council will struggle to meet their need within their own boundary and so the Duty to Cooperate should be embraced by Northampton Borough and the adjacent authorities to provide for any unmet needs as close to the Borough boundary as possible.

The current short supply of space combined with the significant constraint of the Borough’s administrative boundary requires that the Borough Council maximises opportunities which exist for sustainable development. The Brackmills Industrial Estate is ideally situated adjacent to the urban edge of Northampton and benefits from excellent transport links, which has ensured that it remains in demand for warehouse and distribution development. However, the estate is reaching capacity and therefore opportunities to expand the current limits of the estate must be considered through the Local Plan Part 2.

In this regard the land identified in planning application N/2016/0412 should be considered a sensible, logical and sustainable extension of the Brackmills Industrial Estate. Development of the site could be seamlessly integrated into the existing industrial estate. Significant landscaping is incorporated in the current proposals which would help to screen the development from view from the surrounding areas and which would form a strong and defensible boundary between the Brackmills Industrial Estate and the village of Great Houghton. The Local Plan Part 2 should seek to allocate this land for employment development in order to capitalise on the opportunity presented.
Site Location Plan – land south of Bedford Road, off Liliput Road, Northampton
Local Plan Part 2 Consultation June 2016

Submitted by Oxalis Planning on behalf of Roxhill Developments Limited
Northampton Local Plan (Part 2) and Partial Review of the Central Area Action Plan

Comments Form and Guidance Notes

Issues Consultation Paper
SA Scoping Report
Draft Statement of Community Involvement

Northampton Borough Council
April 2016
Consultation Guidance Notes

- Northampton Local Plan (Part 2) Issues Consultation
- Sustainability Appraisal Scoping Report
- Draft Statement of Community Involvement

Northampton Borough Council is inviting your comments on the Northampton Local Plan (Part 2) Issues consultation and accompanying Partial Review of the Central Area Action Plan, the Sustainability Appraisal Scoping Report and a draft Statement of Community Involvement (SCI).

The Borough Council has published the Northampton Local Plan (Part 2) Issues consultation paper for consultation until Friday 10 June 2016. It is accompanied by a Sustainability Appraisal Scoping Report as part of the consultation. This is in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Northampton Local Plan (Part 2) will be the starting point for considering all planning applications within the Borough, alongside the policies in the West Northamptonshire Joint Core Strategy. The Local Plan (Part 2) will focus on providing local detail that is not already the subject of strategic policies.

It will identify land for new development for the provision of housing, jobs and other uses as well as areas for protection. The Local Plan will also include policies to help determine planning applications.

The Sustainability Appraisal Scoping Report sets out the scope of the Sustainability Report which will accompany the Northampton Local Plan (Part 2).

The Council is also consulting on the Draft Statement of Community Involvement, which sets out how the Council will involve the community in plan making and when considering planning applications.

The consultation period runs from 27 April to 10 June 2016.

Where can I view the consultation documents?

You can view the consultation documents in the following ways:

  This system also allows you to submit comments.
- At The Guildhall One Stop Shop, Northampton Borough Council, St Giles Square, Northampton NN1 1DE.
At all libraries in Northampton Borough.

If you do not have access to a computer, you can request paper copies by:
emailing planningpolicy@northampton.gov.uk
telephoning 01604 837326
or by writing to Northampton Local Plan (Part 2) Issues Consultation,
   Planning Policy, Regeneration, Enterprise & Planning Directorate,
   Northampton Borough Council, The Guildhall, St Giles Square,
   Northampton NN1 1DE
If you would like copies of consultation documents in translated or other formats please refer to the Council’s website at:
http://www.northampton.gov.uk/info/200041/equality_and_diversity/1309/interpreting

How can I comment?
You can comment on the consultation documents in one of the following ways:

Online: http://northampton.gov.uk/localplanissues OR

Complete the comments form which you can download from the website. By using the comments form, it helps us ensure we have all the correct information to register and process your comments and keep you informed. Once completed you can do the following:

Email: planningpolicy@northampton.gov.uk OR

Post: Northampton Local Plan (Part 2) Issues Consultation, Planning Policy, Regeneration, Enterprise & Planning Directorate, Northampton Borough Council, The Guildhall, St Giles Square, Northampton NN1 1DE (using the comments form available on the website)

All the above can be found by accessing the following link:
http://northampton.gov.uk/localplanissues

Responses should be submitted by 5pm on Friday 10 June 2016.
**How will my comments be used?**

The Council will consider your comments in progressing work on the Northampton Local Plan (Part 2). Comments received will be published on the Council’s consultation portal in accordance with the Data Protection Act.

Responses will be reported to the Council’s Cabinet Advisory Group, which advises on the preparation of the Northampton Local Plan (Part 2). They will also be reported in summary to the Council’s Cabinet.

If you are organising a petition or intend to, or have signed one, it must be submitted by the deadline and be accompanied by the name and contact details of the petition organiser. The Council will only register the petition organiser on its Local Plan consultation database and future notifications will only be sent to the petition organiser. The number of signatories to the petition will be recorded.

Following the consultation, a feedback report will be produced setting out the main issues raised by the consultation documents. Responses will be used to inform preparation of the next versions of the documents. These will be:

- Northampton Local Plan (Part 2) Options consultation
- Sustainability Appraisal Report for Options Local Plan
- Final Statement of Community Involvement

**Fair Processing Notice issued under The Data Protection Act 1998**

All observations, objections and supporting comments submitted to Northampton Borough Council are public documents. Therefore the information you submit in response to consultations on the Local Plan will be publicly available as part of the consultation responses and made available for any member of the public to view in person. This may include your name and the comment made. Specific personal contact data such as your email address, signature, postal address and telephone number will not be published on the Northampton Borough Council website but retained for contact purposes only by the planning department at Northampton Borough Council.

In submitting a comment on the Local Plan you agree for your information to be held and processed for the purpose(s) and in the way detailed above.

If you have any questions, please contact us by email at: planningpolicy@northampton.gov.uk or by telephone: 01604 837326.
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Northampton Local Plan (Part 2) and Partial Review of the Central Area Action Plan

Issues Paper

Northampton Local Plan (Part 2)

Question 1 – What are the main issues relating to housing delivery, mix and affordability which the Local Plan (Part 2) should consider? The Local Plan (Part 2) will not be reviewing the number of new homes that is already identified in the adopted Joint Core Strategy.

N/A

Question 2 – Do you think that we need sites that can deliver new homes more quickly, in the short to medium term?

N/A
Question 3 - Do you think that we need a mix of market housing eg. family homes, housing for single households?

N/A

Question 4 - Do you think that we need a mix of affordable housing eg. affordable rent, social rent, shared ownership, Starter Homes?

N/A
Question 5 – Is there evidence to support the Local Plan (Part 2) introducing the optional national housing technical standards in relation to access and space standards?

N/A

Question 6 – Is there evidence to support the Local Plan (Part 2) introducing the optional national housing technical standards in relation to water efficiency standards?

N/A
Question 7 – Are there particular sites that are not used currently for employment uses which you consider would be particularly suitable for new employment uses? The Local Plan (Part 2) will not be reviewing the jobs growth which is already set out in the adopted Joint Core Strategy.

Please see attached.

Question 8 – Outside of the Enterprise Zone, are there any other existing employment areas where opportunities could be improved and vacancy rates could be addressed? If so, how could this be achieved?

Please see attached.
Question 9 – Do you think there are any areas within the Borough where certain types of employment development are generally acceptable but which currently require planning permission, which could reasonably be dispensed with through the introduction of a Local Development Order?

Please see attached.

Question 10 – Please provide details of any particular infrastructure issues in relation to new development which you think the Local Plan (Part 2) should address, if possible providing evidence?

N/A
Question 11 – How do we ensure a successful town centre in light of changes to shopping habits such as increased use of out of town retail and on-line shopping? The Local Plan (Part 2) will not be reviewing the retail growth which is set out in the adopted Joint Core Strategy.

N/A

Question 12 - Are there areas where the location of betting shops and hot food takeaways should be restricted?

N/A
Question 13 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to protect and enhance areas of biodiversity in addition to the policies in the NPPF and Joint Core Strategy?

N/A

Question 14 - Do you think there are priority areas where green infrastructure networks could be enhanced or extended?

N/A
Question 15 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to protect and enhance heritage in addition to the policies on the historic environment in the NPPF and the Joint Core Strategy?

N/A

Question 16 - Should the Council review the list of locally listed assets of historical importance?

N/A
Question 17 - Do you think there are locally important landscapes which should be identified in the Local Plan (Part 2)?

N/A

Question 18 – How do we ensure that new development preserves and enhances the character and appearance of the Borough and makes a positive contribution?

N/A
Question 19 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to promote measures within new development to address climate change and renewable energy in addition to the policies in the Joint Core Strategy?

N/A

Question 20 – Should we review and incorporate existing Interim Planning Policy Guidance (eg. Affordable Housing, Houses in Multiple Occupation, etc) into the Local Plan (Part 2)?

N/A
Question 21 - Are there any other issues that the Local Plan (Part 2) needs to consider?

N/A
Central Area Action Plan

Question 22 - Flood Risk and Drainage (Policy 5) - is this policy still appropriate and up to date in relation to the Drainage Plan Part 1?

N/A

Question 23 - Inner Ring Road (Policy 6) - is the proposal for the Inner Ring Road still appropriate and up-to-date?

N/A
Question 24 - Safeguarded Public Transport Route (Policy 8) – is the proposal for a public transport / cycling / walking route still appropriate and up-to-date?

N/A

Question 25 - Pedestrian and Cycling Movement Network (Policy 9) – should this policy be updated to link to the County Council’s Smart Corridors initiative? Are the identified routes into and across the town centre still up-to-date?

N/A
Question 26 - Parking (Policy 10) – should the Council identify more car parks within the town centre and if so, where should they be?

N/A

Question 27 - Improving the Retail Offer (Policy 13) – this policy needs to be updated due to changes in Government policy such as the extension of permitted development rights. Do secondary frontages still need to be identified?

N/A
Question 28 - Meeting Retail Capacity (Policy 14) – do we need a more up-to-date retail capacity study to ensure that this policy is up-to-date?

N/A

Question 29 - Office and Business Uses (Policy 15) – this policy needs to be revised due to changes in Government policy. Should we identify land for new offices within the town centre? How should the Council seek to safeguard existing office space, especially in light of recent and proposed Government changes regarding permitted development rights?

N/A
Question 30 – Do any of the site specific policies need updating? Please indicate which policies and provide details if possible (Policies 18-35).

N/A

Question 31 - Please provide details of any other policies in the Central Area Action Plan which you consider the Council should reassess to ensure that they are up-to-date, if possible providing evidence.

N/A
When preparing a Local Plan, the Council is legally required to undertake an environmental appraisal of its proposed plans and policies, as well as a Strategic Environmental Assessment (SEA). There is a requirement to consider the social, economic and environmental impacts of these policies.

**Question 32 - Do you have any comments on the Sustainability Appraisal Scoping Report?**

Please identify the page, paragraph number(s), table or appendix within the Scoping Report to which each of your comments applies.

N/A
The Statement of Community Involvement sets out how the local community, businesses and other organisations with an interest in development in Northampton can get involved. It provides a framework for involving and informing community engagement in plan making as well as in determining planning applications.

Question 33 - Do you have any comments on the Draft Statement of Community Involvement?

N/A