CC Town Planning have been appointed by Manor Farm Developments Ltd (‘the client’) to provide town planning consultancy services in respect of their land interests within South Northamptonshire.

The following correspondence is submitted in response to the submission version of the South Northamptonshire Council (‘SNC’) Part 2 Local Plan (‘LP’) which has been published for the purposes of public consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This correspondence should be read in the context of those previous submissions made on behalf of the client in respect of their land holding at Northampton Road, Blisworth.

To assist you this letter is accompanied by the following;

- A site location plan identifying the extent of our client’s land interests at Northampton Road, Blisworth (For information purposes); and
- A completed SNC representation form for the South Northamptonshire (Part 2) Local Plan Draft Submission (Regulation 19) Consultation.

To provide some context our Client’s land holding lies to the north of the centre of Blisworth and is accessible at points along Northampton Road which delineates the western boundary of the site for approximately 200 metres. The site is currently laid to grass and being grazed.

An extract from the enclosed site location plan is set out below on Plate 1.
The following seeks to provide a pertinent response to those salient points which have been highlighted by the client during their assessment of the consultation document.

The client welcomes the acknowledgement, as set out within the LP2’s vision, that at the end of the plan period there will be a wider choice of homes to meet locally identified needs. Whilst it is anticipated that housing growth will be delivered in a sustainable manner, it is considered that to ensure this prevails, the strategy needs to rightly acknowledge that housing needs exist within the rural area which may not necessarily be picked up within a housing needs survey.

The Settlement Hierarchy correctly acknowledges the sustainability credentials of Blisworth and confirms that the village is a suitable location for limited development, it is also agreed that the evidence base which has justified the settlements location within the hierarchy has been soundly produced.

Notwithstanding our long-standing issue with Policy R1 of the West Northamptonshire Joint Core Strategy serving as a ‘cap’ rather than a ‘target’ figure, it is considered that the policies within the emerging LP2 will provide the much-needed flexibility to allow for such development as and when it is required. Therefore, at the outset, the approach to residential development in the rural area is considered positive and importantly recognises that appropriate growth is key to increasing the vitality, viability and longer-term sustainability of such areas, not just within South Northamptonshire, but across West Northamptonshire as a whole.

Policy LH1 sets a sound and flexible approach to dealing with residential proposals outside of, but adjacent to existing village boundaries. Furthermore, the cross references to Policies LH2, LH3, LH4 and LH5 are important to ensuring the development in rural areas is not wholly constrained.
In regard to the content of Policies LH2-5, it is considered that the detail within each policy sets a suitable strategy to enable the delivery of residential development to meet those needs which will inevitably be identified through periodic revisions to the evidence base over the course of the plan period.

In specific regard to Policy LH2, our client does have some concerns in respect of the second part of this policy and the three adjoining criteria (2i-iii), it is considered that in the majority of cases market housing will be required to facilitate the delivery of starter homes. To ensure that any future needs for starter homes can be met, Criteria i should be removed and Criteria ii revised to ensure that there can be an appropriate level of return to land owner in order to incentivise them to release sites for development.

Whilst it is considered that the Council’s approach to housing delivery in the rural area, as set out within the LP2, is a positively prepared and strategy which is justified on the basis of an appropriate and robust evidence base, it is the client’s opinion that the content of those aforementioned elements could be revised to ensure the effective implementation of the document.

Notwithstanding the points raised above, the client is in agreement that the LP2 presents the most suitable strategy, when assessed against the reasonable alternatives, which is both deliverable and consistent with national policy. Therefore, against the backdrop of our client’s land and property interests, the LP2 is considered both legally compliant and sound in its content.

Enclosed with this covering letter are the requisite forms and a site location plan which clearly delineates the extent of that land under the ownership of our client. It is urged that both this submission the enclosures and previous submissions are read together in their entirety, we will of course provide you with any further relevant information should require it (subject to availability).

If you have any questions on the above or need any further information, then please do not hesitate to contact us via any of those channels listed. 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
South Northamptonshire Council is preparing a Part 2 Local Plan for the District which will supplement the West Northamptonshire Joint Core Strategy and will replace Saved policies in the South Northamptonshire District Local Plan 1997; it will cover the period up to 2029. This stage is the Draft Submission Local Plan Regulation 19 and is the version of the plan that the Council intends to submit to the Planning Inspectorate.

This form should be used to make representations on the South Northamptonshire (Part 2) Local Plan Draft Submission which has been published.

An electronic version of the representation form is available at: [https://www.surveymonkey.co.uk/r/South_Northamptonshire_Local_Plan_reg19](https://www.surveymonkey.co.uk/r/South_Northamptonshire_Local_Plan_reg19)

Under new Data Protection regulations (GDPR) South Northamptonshire 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 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 privacy notice: [https://www.southnorthants.gov.uk/privacy-and-cookies](https://www.southnorthants.gov.uk/privacy-and-cookies)

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 South Northamptonshire Council (Part 2) Local Plan Draft Submission Regulation 19.

✓ Yes (please tick)
Please complete and submit by 12 noon on Friday 16 November 2018. Responses received after this time will not be accepted.

This form has two 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**

1. **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 organisations; please specify:

<table>
<thead>
<tr>
<th>Personal details</th>
<th>Agent's details (if applicable)</th>
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<tbody>
<tr>
<td><strong>Title</strong></td>
<td><strong>MR</strong></td>
</tr>
<tr>
<td><strong>First name</strong></td>
<td><strong>MICHAEL DUNN</strong></td>
</tr>
<tr>
<td><strong>Job title (where relevant)</strong></td>
<td><strong>DIRECTOR</strong></td>
</tr>
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<td></td>
<td><strong>MR</strong></td>
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<tr>
<td></td>
<td><strong>ROSS MIDDLETON</strong></td>
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<td></td>
<td><strong>PRINCIPAL PLANNING CONSULTANT</strong></td>
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</table>
### Part B  Your Representation

**Please use a separate sheet for each representation**

Please note all comments will be made publically 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 South Northamptonshire (Part 2) Local Plan to be legally compliant | YES | ✓ | NO |
If **NO**, is this because it is:
*(please tick all that you think apply)*

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<thead>
<tr>
<th>Not prepared in accordance with the Local Development Scheme</th>
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<tr>
<td>Not prepared in accordance with the Statement of Community Involvement</td>
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<tr>
<td>Not consistent with the regulatory requirements for consultation</td>
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<tr>
<td>Not compliant with the Duty to Co-operate</td>
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<tr>
<td>Not accompanied by a compliant Sustainability Appraisal</td>
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2 (1) Please give details of why you consider the South Northamptonshire (Part 2) Local Plan Draft Submission document is not legally compliant. Please be as precise as possible.
3. Do you consider the South Northamptonshire (Part 2) Local Plan to be sound?  

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
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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?

<table>
<thead>
<tr>
<th>Paragraph number</th>
<th>Policy number</th>
<th>Policies Maps</th>
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4 (1) Please set out the changes that you consider are necessary to make the South Northamptonshire (Part 2) Local Plan Draft Submission 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.

THE CLIENT CONSIDERS THE STRATEGY TO BE SOUND, HOWEVER PLEASE FIND THEIR ADDITIONAL COMMENTARY ATTACHED
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.

5. 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 |

6. If you wish to take part at the oral part of the 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)).

7. Please tick a box if you wish to be notified of further progress of the Local Plan. (Please tick all that apply).

| When the South Northamptonshire (Part 2) Local Plan 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 the South Northamptonshire (Part 2) Local Plan is published | ✓ |
| When the South Northamptonshire (Part 2) Local Plan has been adopted | ✓ |
| Other (please specify) | |

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Thank you for taking the time to complete the form.

Please return it to:

Email: LocalPlanConsultation@southnorthants.gov.uk

By post or by hand to:

Planning Policy Team
South Northamptonshire Council
The Forum
Moat Lane
Towcester
NN12 6AD