TOWN AND COUNTRY PLANNING ACT 1990

Written Representations on the South Northamptonshire Council Pre-Submission Draft Local Plan Part 2

Land at Roade

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Statement on behalf of Chartwell Industries Limited

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1. Chartwell Industries Limited land ownership in Roade
1. INTRODUCTION

1.1 We act on behalf of Chartwell Industries Limited and seek to make representations to the South Northamptonshire Local Plan Part 2 (pre-submission draft) in respect of their land interests in Roade. The following representations set out a constructive critique of the Local Plan and also present five sites that are suitable for development, together with identifying other land and property owned by our client that is certainly open to consideration if they are preferred. Four sites (A-D) have previously been promoted through various consultation exercises and are again being submitted for consideration through the Local Plan (Part 2). An additional site is now being put forward for consideration (Site E).

1.2 Chartwell generally supports the Local Plan (Part 2) in order to secure the future development of settlements, including Roade, in a well-planned and comprehensive manner.

1.3 The company has, over a number of years, promoted land for residential development and other uses and has adopted a pro-active approach including communication with both South Northamptonshire Council and Roade Parish Council on the availability and suitability of its landholdings for development.

1.4 Submissions have been made to South Northamptonshire Council over the years supporting a comprehensive approach to development and a package of community benefits for Roade. A number of these submissions formed part of the process which led to the publication of the draft Roade Masterplan, and included the potential allocation of some of our client’s land. At the same time, Chartwell supported local facilities and opportunities.

1.5 The former Pianoforte site was allocated for development; planning permission granted and is now being developed. There is a planning gain package linked to this, including gifting of land for a cemetery, the site of the Roade FC and provision for a potential doctors surgery amongst other things. The company has held a number of discussions with South Northamptonshire Council and Roade Parish Council on the merits of their sites and potential community benefits that could follow. One particular example of potential community benefit that has been raised in the past, amongst others, relates to the possibility of securing the future use of the former cricket ground within the Council ownership for community use, either as open space, car parking, village hall, affordable housing, or a combination thereof. This form of planning gain is potentially possible through the development of the Chartwell sites promoted during this consultation.

1.6 Since we submitted representations to the Council at the Issues and Options stages of the Plan, Roade has since been adopted as a Neighbourhood Plan boundary area by the Council, 20 July 2016.

1.7 This written representation also acknowledges the proposed Northampton Gateway Strategic Rail Freight Interchange (SFRI) on land to the west of M1 junction 15, which includes a new bypass to the village of Roade to the south. Significant improvements to junction 15 of the M1 are also proposed, which will result in junction capacity increasing by around 30 to 35% (proposed to be constructed 2019-2020). The SFRI is currently out to public consultation and forms a Nationally Significant Infrastructure which means an application for a ‘Development Consent Order’ is made to the Planning Inspectorate. On formal acceptance of the application the Planning Inspectorate will examine the proposals in detail before making a recommendation to the Secretary of State for Transport, who will...
then formally determine the application. The project is claimed to generate between 6000-7500 jobs once operational, while adding £316 million per annum to the local economy (primarily focused on Northamptonshire).

1.8 The Local Plan provides, therefore, a major opportunity for a significant package of planning gains and community benefits for Roade with the redevelopment of the land identified within this representation or others owned by Chartwell. Through development, there are potential opportunities to assist in supporting the local community.
2. **BUILDING SUSTAINABLE COMMUNITIES (SECTION 4)**

2.1 Chartwell supports the Council’s policies regarding site development principles and feels that use of Village Design Statements and Design Codes are an appropriate means to ensuring development is sympathetic to local landscape characteristics and local vernacular. Our client’s land ownership offers the opportunity to strengthen and better define the boundary to the village.

2.2 There is, however, the need at an early stage in the preparation of planning applications to consider the scale of financial contributions. The general approach being advanced to recreation and community facility provisions is accepted.

2.3 While improvements may be needed to the A508 and other roads in Roade (which may come forward as a result of the proposed Northampton Gateway), such improvements should be identified in terms of the impact by the actual development. Contributions towards any improvements should be fair and proportionate, ensuring development remains viable. These matters can be dealt with at the planning application stage. We also recognise that the Government have consulted on options for reforming the system of developer contributions including more direct benefit for communities and are expected to make an announcement in the forthcoming Autumn Budget 2017 (Housing White Paper page 40, paragraph 2.29). Chartwell have continued to support local organisations through its land holdings.

2.4 Providing that the Local Plan process is progressed quickly to its adoption as a material consideration, Chartwell will seek to provide technical support for planning applications and will work closely with the Councils and Highway Authority on these matters.

2.5 As shown on our plan, Chartwell owns many landholdings in and around Roade. The company is relatively flexible and open minded as to which of their sites should be developed for the longer term needs of the village, subject to viability of course.

2.6 In our previous consultation submissions we identified four sites A, B, C and D as having the greatest potential; we are now including a fifth site, E, for consideration, reflective of the current proposals for the Northampton Gateway Strategic Rail Fright Interchange. Other land near to the football club, the brownfield quarry site and the bowls club has also been discussed in the past to explore their development or planning gain potential. There are technical issues to be considered with some of Chartwell’s land, but we would reiterate that from Chartwell’s point of view, none of their land assets are ruled out from consideration as part of an overall planning gain package. In this respect we have recently submitted representations on the informal consultation for Roade Draft Neighbourhood Development Plan.

2.7 It will ultimately be down to all parties, including South Northamptonshire Council, the Parish Council, local residents and Chartwell as landowner, to decide which assets are best placed for any development, including affordable housing and which for community benefit.
3. **SPATIAL STRATEGY FOR SOUTH NORTHAMPTONSHIRE DISTRICT (SECTION 5)**

Settlement Hierarchy

3.1 We note that Roade is identified as a Primary Service Village (Second Tier) which is recognised as one of the most sustainable villages in the District, ‘having the ability to support sustainable patterns of living because of current levels of facilities, services and opportunities which are available’.

3.2 The weight to be given to each ‘service/facility’ needs to be carefully considered. Subdivision of facilities into four categories (most important; very important, important and less important) appears logical, but is not without flaws. Will the weighting of each facility within each category be equal, or will there be added weighting to certain elements? Either option needs to be fully justified by the Council.

3.3 It is also the case that certain services could be argued to be more or less important than that which is stated.

3.4 On the Council’s Hierarchy Matrix for villages within the District, we draw particular attention to the potential to increase of ‘local employment’ in Roade. The village currently scores no points from a potential of four, although should the Northampton Gateway (Strategic Rail Freight Interchange) commence as proposed, the level of available local employment opportunities would change significantly with an estimated 6000-7500 jobs generated on its completion.

3.5 The level of development expected to be accommodated by a specific settlement may also play an important role which cannot be disregarded. There may be a specific facility/service void in a location, which could be overcome if a development of sufficient scale is provided. For example the scoring relating to bus frequency to an urban area may increase if a service can be considered to be made viable from development. Similarly, should the Northampton Gateway Strategic Rail Freight Interchange be developed nearby, then accessibility into and out of Roade will improve via the bypass and M1 junction improvements, presenting the village as a sustainable location. Paragraph 28 of the National Planning Policy Framework (NPPF) states planning policies should support economic growth in rural areas to create jobs and prosperity, by taking a positive approach to sustainable new development, whilst paragraph 37 places an emphasis upon minimising journey lengths for employment.

3.6 It is clear that the score applied to Roade may improve should the Northampton Gateway (SRFI) be implemented, which would provide significant employment in the area and improve accessibility into the village via M1 junction improvements.

3.7 The Governments’ recent Housing White Paper states that they are proposing a number of changes to the NPPF including the expectation that “local planning authorities will identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up” (page 27, paragraph 1.33).

Settlement Confines

3.8 The settlement confines for Roade do not appear to propose any changes. However, Chartwell Industries Limited feel that there is a need to adjust the boundary for the village,
particularly given the Council adopted a masterplan for the area in which some of our client’s land has been developed, which illustrates there is capacity to grow the village. The village confines do not consider or take account of the current proposal for the Northampton Gateway Strategic Rail Freight Interchange which includes a series of road improvements and a new bypass road to the west of the village. We have responded to the local Neighbourhood Planning Group in respect of their Informal Consultation Draft and have highlighted opportunities to improve the provision of community facilities in the village by way of planning gain, should they support and allow some housing development on our client’s landholdings. Our client has historically acted in the interests of the local community, having gifted land for a cemetery, land for Roade FC, and provision for a future Doctors surgery as part of allocating and developing the former Pianoforte site.
4. GENERAL HOUSING POLICIES (SECTION 6)

4.1 The NPPF states in paragraph 158 that Local Plans must be based on adequate, up-to-date evidence about the economic characteristics of the area and ensure they take full account of the relevant market and economic signals. The relationship between economic development in an area and the need for housing is underlined in Paragraph 161 which requires authorities to provide a sufficient amount of existing and future supply of land available for economic development, relating to its sufficiency and suitability to meet the identified needs, which should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments. Given that the Council’s own evidence base on commercial need acknowledges there is a high percentage of out-commuting from the Local Plan area, it is a sensible assumption to suggest that economic growth should align with local housing needs to create sustainable settlements; particularly with the Northampton Gateway (SRFI) proposed nearby.

4.2 The Sustainability Appraisal report part 3a states in Table 2.1 that the Council’s preferred strategic and policy approach to rural housing is criteria based, to ensure that any sites that do come forward are in the most sustainable places and that local needs are assessed and met. Within the table it is even stated ‘The Council does not have the up to date detailed evidence of local need for individual villages / parishes’, it continues ‘it is important to recognise that such evidence can change in a relatively short space of time’.

4.3 Given that Roade may significantly increase its level and provision of local employment in the nearby area, the Council should reconsider housing needs (including affordable) which they do not appear to have; given within table 2.1 they acknowledge they don’t have ‘up-to-date detailed evidence’ of local housing needs within villages. This is contrary to national planning guidance set out within paragraph 159 of the NPPF.

4.4 Whilst the Council are understood to have a five year supply of housing in place, a recent appeal decision at Candle Cottage in Blisworth (S/2016/1046/OUT and APP/Z2830/W/16/3165559) found that the Council have a shortfall of 55 dwellings in rural areas, as found by a Planning Inspector. Whilst the Council are mounting a legal challenge to this decision it remains a material consideration. A five year land supply should also not preclude development as paragraph 47 encourages local authorities to significantly boost the supply of housing; at no point does the policy provide a limit or cut off point.

4.5 The West Northamptonshire Joint Core Strategy recognises the need for limited development in rural areas, providing the scale of development is consistent with the objective of meeting local needs and supporting local services. ‘Policy Housing 1’, however, limits growth to within settlement boundaries, while ‘Policy Housing 2’ results in exhaustive criteria to be applied outside of settlement boundaries; which conflicts with the positive approach required under paragraph 14 of the NPPF to provide sustainable development where the benefits outweigh any demonstrable harm. Our client, therefore, opposes ‘Policy Housing 2’; particularly as the proposed settlement confines are too tightly drawn to accommodate any additional growth. Setting strict settlement boundaries does not allow adequate flexibility for development to come forward outside the settlement boundary if this is required (for example due to a shortfall of housing land). The Framework is clear that development which is sustainable should go ahead. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework.
4.6 There is a clear conflict between the settlement hierarchy which states that limited development can take place adjoining settlement boundary confines, where there is a local need, yet ‘Policy Housing 2’ limits growth to within settlement boundaries with an exhaustive set of criteria. We consider this to conflict with the positive approach required under paragraph 14 of the NPPF to provide sustainable development where the benefits outweigh any demonstrable harm.

4.7 The settlement confines do not reflect the adopted masterplan for the area which found there was capacity to grow the settlement. Our client has also responded to the Roade Neighbourhood Planning Group’s informal consultation draft in which they seek engagement with the Group to explore opportunities for planning gain.

4.8 Chartwell has historically acted in the interests of the village, which is reflected by the current development of the former Pianoforte site. In this instance Chartwell gifted land for a cemetery, the site for Roade FC, and made provision of a future Doctors surgery. The Neighbourhood Planning Group are proposing to allocate two of our client’s sites for community use, which our client is willing to support providing the Group support some housing development by way of planning gain.

4.9 Another factor for the Council to consider is the current consultation on the Northampton Gateway Strategic Rail Freight Interchange which includes a bypass road to the west of Roade. Our client owns land in this area (shown as parcel E on our accompanying plan).

4.10 The proposed ‘Policy Housing 3’ states that developers should include provision of 5% bungalows on all developments of 10 or more dwellings, unless a locally objectively assessed need permitted under Policy LOAN suggests otherwise. The issue with this policy is its potential to affect viability given the use bungalows does not represent the most efficient use of land. The policy does not consider the potential for Lifetime Homes to help address the needs of older residents. The large majority of housebuilders have lifetime compliant house-types and it is suggested this should form a factor for consideration within the policy. Alternatively, the Council could consider the provision of one bungalow as a contribution equal to two affordable units on-site, to offset the potential issue on viability.

4.11 We support the principle of the LOAN policy which allows housing development on suitable sites outside, but immediately adjoining, settlement confines where there is a clear objectively assessed local housing need. The Council must, however, ensure that any organisation they wish to nominate to carry out the Housing Need Assessment (HNA) on their behalf acts in a fair and impartial manner, without any conflict of interest.

4.12 Chartwell object to the LOAN policy criteria requiring demonstration of community involvement to ensure the views of the local community inform a proposal, particularly when the LOAN policy also states schemes should reflect the overall mix and type of dwellings defined by the HNA. The need to demonstrate and carry out community involvement to help shape proposals already forms a key part of the NPPF. Adding another tier of consultation linked directly to the LOAN policy risks undermining its purpose, which is to allow development adjoining the confines of the settlement where there is a proven need.

4.13 We generally support housing policies 9 and 10 in respect of self-build homes and homes built to rent, although the recent Government housing White Paper ‘Fixing our Broken Housing Market’ indicates that they are proposing ‘stronger support for sites that provide...
affordable homes for local people’. It is also expected that the definition of “affordable housing” will change within the NPPF, as the White Paper suggests in pages 99-100.
5. THE ECONOMY (SECTION 10)

5.1 Chartwell Industries Limited recognise that there is strong potential to grow the local economy under the proposed Northampton Gateway Strategic Rail Freight Interchange, which would create an estimated 6000-7500 jobs once operational, and contribute added value in the region of £316 million to the local economy. In light of this scheme being proposed to the north of Roade, our client generally supports the Local Plan policies on the economy, particularly as the Economic Development Strategy of July 2016 identifies logistics as one of the District’s key sectors; with a recognition of the need to build on the locational advantage of the area by enabling growth in appropriate locations around the M1.

5.2 Our client sees the opportunity to provide housing accommodation to support the anticipated economic growth resulting from the Strategic Rail Freight Interchange. Housing development on our client’s land would also minimise journey lengths for employees in accordance with paragraph 37 of the Framework; whilst paragraph 159 states planning authorities must have a clear understanding of housing needs in the area.

5.3 The Sustainability Appraisal report part 3a states in Table 2.1 that the Council’s preferred strategic and policy approach to rural housing is criteria based to ensure that any sites that do come forward are in the most sustainable places and that local needs are assessed and met. Within the table it is even stated ‘The Council does not have the up to date detailed evidence of local need for individual villages / parishes’, it continues ‘it is important to recognise that such evidence can change in a relatively short space of time’.
6.  NATURAL ENVIRONMENT (SECTION 15)

6.1  Our client generally supports policies set out within the Local Plan relating to the natural environment. There are no strategic planning constraints on any of Chartwell’s sites relating to the natural environment. Development of these sites also provides opportunity to landscape buffer the village to its eastern boundaries, helping to screen any impacts associated with the M1.
7. CONCLUSIONS

7.1 We acknowledge that in the very short term there is significant housing development taking place in the village. Throughout the proposals for the Pianoforte site recently granted planning permission, Chartwell and the professional team have worked with the Council and Parish Council to deliver mutual benefits and we wish this co-operative approach to continue.

7.2 We are of the opinion that some of Chartwell’s land assets are the best sites to accommodate the future development needs for the village, whilst at the same time delivering local community benefits which are material planning considerations of developing these sites.

7.3 This co-operative approach is in contrast to the likely approach of conventional developers, who may adopt a more hostile stance to planning applications and appeals, resulting in the delivery of planning consents on landholdings that the local community is opposed to and also with no possibility of appropriate planning gain being negotiated.

7.4 The Council’s masterplan for the village shows there is capacity for the village to grow; whilst the forthcoming application relating to the Northampton Gateway (Strategic Freight Rail Interchange) is likely to result in a significant number of jobs being created in the area. In light of this Chartwell Industries Limited request the Council consider housing need within the village as part of the Local Plan and redraw the village confines to accommodate potential growth within the Plan period.
APPENDIX 1

Chartwell Industries Limited land ownership in Roade