Dear Sir / Madam,

**South Northamptonshire Part 2 Local Plan.**

**Consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.**

**Representations on behalf of Clowes Developments (UK) Ltd.**

CC Town Planning have been appointed by Clowes Developments (UK) 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 (‘LP2’) which has been published for the purposes of public consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

For clarity, previous submissions to the process have been made, on behalf of the Shacks Farm Barn Partnership, by Mr. A Banks of 3RD Party Delivery Associates Ltd. Therefore, this letter should be read in conjunction with those earlier submissions and in the context of those wider representations which have been made to SNC, in respect of the site, through the various public consultation stages for the emerging LP2.

To assist you this letter is accompanied by the following;

- A site location plan identifying the extent of our client’s land interests at Shacks Barn, Whittlebury, Northamptonshire (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 covers a site area of circa 10 hectares and is located on the boundary of Silverstone and Whittlebury Parish Lying adjacent to the A43 trunk road the site is served by an existing substantial access.

Emerging Policy AL4 acknowledges the suitability of the site to assist in the future economic growth of the District and allocates the site for such purposes through the same policy.
To provide some locational context an extract from the enclosed site location plan is set out below.

Plate 1: Site Location Plan Extract

South Northamptonshire Part 2 Local Plan.

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 LP2’s vision rightly conforms to the content of the West Northamptonshire Joint Core Strategy (2014) (‘WNJCS’) and the objectives set out at Para 2.2.3 of the consultation document are positively worded to ensure the facilitation of economic growth across the district whilst recognising that the overall strategy has to meet the needs of businesses whilst at the same time securing opportunities for individuals in both urban and rural areas.

In light of our clients’ interest at the Shacks Barn site, Chapter 13: Employment Allocations, and particularly Section 13.3 including Policy AL4, are of significance.

Through Policy AL4: Land at Shacks Barn, SNC have taken a justified approach to allocating 10 hectares of land on which will assist in meeting the longer terms needs of the district. This approach is to be commended, the existing Shacks Barn site has been a resounding success, and the policy approach advocated within the LP2 will allow for this success to be maintained, enhanced and extended over the course of the plan period.

Whilst the above observations in relation to the existing Shacks Barn site are anecdotal, the content of Policy AL4 has been largely influenced by the LP2’s evidence base and the approach which has been taken is both positive and based on a strategy which seeks to achieve the economic development objectives set out within the supporting documentation.

The proposed approach within Section 13.3 is consistent with national policy and will assist in the wider strategic objective of achieving sustainable development. Based on proportionate evidence, an assessment of the reasonable alternatives and with continued engagement with our client, the proposed approach to development at the
Shacks Barn site is the most appropriate when considered against those reasonable alternatives.

SNC’s Strategic Housing and Employment Land Availability Assessment has concluded that the site is suitable for the typology for which it is allocated. Clearly, having engaged with SNC throughout the production of the LP2, the client is aware of the technical requirements set out within Policy AL4 and the preliminary technical work which has been progressed by the client confirms that there are no constraints which would prevent development at the site.

Finally, it can be confirmed that the client is keen to progress development at the site in the near term and are currently preparing a planning application for submission in 2019 to coincide with the adoption of, and ensure the successful delivery of, the Council’s strategy for economic growth as contained within the LP2.

It is therefore considered that the Council’s approach to economic development, 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.

In light of the above, the client is in agreement that the LP2 presents the most suitable option, 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
Representation form for the South Northamptonshire (Part 2) Local Plan Draft Submission (Regulation 19 consultation)

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

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

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>
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<th>Personal details</th>
<th>Agent’s details (if applicable)</th>
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<tr>
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</tr>
<tr>
<td>First name</td>
<td>JAMES RICHARDS</td>
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<tr>
<td>ROSS MIDDLETON</td>
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<tr>
<td>Job title</td>
<td>DIRECTOR</td>
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<tr>
<td>PRINCIPAL PLANNING CONSULTANT</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

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
</tr>
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<tr>
<td>✓</td>
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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 Co-operate
- Not accompanied by a compliant Sustainability Appraisal

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? | YES | ✓ | NO |

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 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)

8. Signature [Redacted] Date 14/10/2018

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