1. Introduction

1.1 This Statement has been prepared jointly by the West Northamptonshire Joint Planning Unit (the JPU) and David Lock Associates Ltd., who act as town planning and urban design consultants to Bovis Homes Ltd. (Bovis). Bovis is the prospective developer of the proposed Northampton South Sustainable Urban Extension (SUE).

1.2 The purpose of this Statement is to clarify the extent of common ground between the JPU and Bovis on the policy that proposes this SUE (Policy N5); and to seek to demonstrate the suitability and deliverability of this proposal, and thereby its soundness.

2. The Policy

2.1 The proposed Northampton South SUE is addressed in Policy N5 and its supporting paragraphs 12.37 - 12.43 (SUB4).

2.2 In summary, Policy N5 stipulates that the proposed SUE should make provision for:

- “in the region of” 1,000 dwellings;
- a primary school;
- a local centre;
- an integrated transport network;
- structural greenspace and wildlife corridors;
- open space and leisure provision;
- archaeological and ecological assessment and mitigation; and
- flood risk management.

2.3 The policy also requires the phasing of necessary infrastructure alongside the delivery of the development; and development proposals to be accompanied by a masterplan.

2.4 The proposed allocation is underpinned by an extensive evidence base, which includes all technical considerations. Key elements of that evidence base are outlined in the following sections of this Statement.
3. The Site

3.1 The site for this proposed SUE lies on the southern edge of Northampton, wholly within the administrative boundary of Northampton Borough. The site is well contained, both physically and visually (SUB04; paras. 12.37 – 12.38). The M1 separates the site from the countryside and villages to the south. Topographically, the site relates to the existing urban area to the north at East Hunsbury, towards which it slopes gently down, rather than to the wider countryside beyond the M1. Consequently, the site is “of relatively low landscape and visual sensitivity” (SUB04; para. 12.38).

3.2 The site has been the subject of numerous surveys undertaken on behalf of Bovis since the late 1990s. Those surveys have assessed the site’s agricultural land quality, air quality, archaeology, drainage, ecology, ground conditions, landscape character, noise, traffic implications, utilities and visibility.

3.3 These surveys have found the following constraints to the site’s development:

- flooding alongside the Wootton Brook in the north of the site, which occasionally affects several houses close to the brook within the existing residential area of Collingtree Park (SUB04; para. 12.39), which were permitted prior to the Easter 1998 floods in Northampton;
- ecological interest, which is generally limited to the Wootton Brook corridor (containing the Collingtree Golf Course County Wildlife Site) and to mature hedgerows crossing the site (SUB04; para. 12.40);
- noise and air pollution arising from the M1 alongside the southern edge of the site (SUB04; para. 12.41), this section of the M1 being a designated Air Quality Management Area (AQMA); and
- two small Iron Age or Romano-British settlements in the north-eastern part of the site, adjacent to Collingtree Park, with a third such settlement to the west of the site, found through a recent (January-February 2013) archaeological geophysical survey (c.f. SUB04; para. 12.42).
3.4 Importantly, none of these constraints prohibit the site’s development. Reduction of existing flood risk (betterment) can be achieved through the proposed re-configuration of the golf course (SUB04; paras. 12.38 - 12.39), which enables additional flood storage areas to be provided. The site’s limited ecological interest can be preserved and enhanced through the incorporation of the areas concerned within the required “structural greenspace” (green infrastructure corridors) (SUB04; para. 12.40 and Policy N5). Development can be set back from the M1 and buffered by structural planting (SUB04; para. 12.41), while the archaeological sites are neither especially extensive nor of sufficient importance to be required to be preserved in situ.

3.5 Local organisations, who propose an alternative way of developing the site including by extending it westwards to the railway line\(^1\), argue that there are two further constraints to the site’s development:

- Rowtree Road, to the north of the site, is considered to have insufficient capacity to accommodate traffic arising from the site’s development; and
- the gradient of the slope in the central part of the site is considered to be sufficiently steep to present a high risk of solifluction (land slip).

3.6 The surveys undertaken on behalf of Bovis have demonstrated that neither is a material constraint to delivery. Taking account of planned improvements to the Wootton Interchange under the A45/M1 Northampton Growth Management Scheme (NGMS) (GLD24; and Appendix 4 within SUB04) and of proposed traffic management measures along Rowtree Road in conjunction with the site’s development, Rowtree Road would have sufficient capacity to accommodate traffic arising from the development. The risk of solifluction can be reduced to acceptable levels at construction stage by incorporating standard, inexpensive measures at that stage. Any risk of slippage would be identified by ground investigation and dealt with through appropriate geo-technical design subject to building control.

3.7 For all these reasons, the site is entirely suitable for the proposed SUE.

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\(^1\) Collingtree Parish Council, Hunsbury & Collingtree Residents’ Alliance and Wootton & East Hunsbury Parish Council, within their combined submission to the West Northamptonshire Joint Strategic Planning Committee in December 2012.
4. SUE Delivery

4.1 In addition to being suitable (see section 3 above), the proposed SUE is readily deliverable. The site is under the control of Bovis, a respected national housebuilder that has weathered the recession. Northampton Borough Council (NBC)'s Five-year Housing Land Supply Assessment (April 2012) assumes 50 homes will be constructed within the SUE during the year April 2015 - March 2016. Bovis considers this to be readily achievable, as it does the completion of the 1,000 homes proposed within the SUE by 2026 (the end date of the Plan). This 11-year delivery programme would require an average annual delivery rate of only some 90 dwellings, which again is readily achievable.

4.2 Progress towards the delivery of the SUE is already well advanced. An Outline planning application for a form of development consistent with the proposed Policy N5 is at an advanced stage of preparation. NBC issued a Scoping Opinion for the required Environmental Impact Assessment (EIA) of the proposed development in June 2012. That Scoping Opinion was informed by a detailed EIA Scoping Report submitted to NBC on behalf of Bovis in April 2012.

4.3 Since early January 2013, senior representatives of NBC and Bovis have had fortnightly meetings to discuss progress in preparing the Outline planning application for the SUE. Those meetings have taken place under a Planning Performance Agreement (PPA) between the two parties, in accordance with best practice for progressing major developments through the planning process.

4.4 Appended to the PPA is an agreed Project Plan, which anticipates submission of the Outline application around the time the Examination hearings are due to close; and its determination around the end of 2013. This agreed programme allows for the determination of the application to be informed by the Inspector’s findings on the SUE as a result of this Examination. The determination of the application around the end of 2013 would allow sufficient time for Reserved Matters to be approved, pre-commencement conditions to be discharged and site preparation to take place, to enable homes to be constructed during the year April 2015 – March 2016, as programmed by NBC (see para. 4.1 above).

4.5 Also appended to the PPA is an agreed Community Engagement Plan (CEP). Significant elements of that CEP include:

- a project website (www.northamptonsouthsue.com);
- meetings with local objectors on 28 January, 25 February and 8 March 2013;
- a design workshop with the local Youth Council on 7 March 2013; and
- a public exhibition on 15 and 16 March, and on 18 - 22 March 2013 inclusive.
4.6 The draft Development Framework Plan (DFP) displayed at that public exhibition forms **Appendix 1** to this Joint Statement. This draft DFP depicts a development consistent with the proposed Policy N5, including its provision for a primary school, a local centre, an integrated transport network, structural greenspace and wildlife corridors, and open space and leisure provision (see para. 2.2 above).

4.7 The principle of meeting the secondary education needs arising from the SUE by utilising surplus capacity at the Elizabeth Woodville School at nearby Roade was agreed during a meeting between representatives of Bovis, NBC and Northamptonshire County Council as Local Education Authority on 11 March 2013.

4.8 The inclusion of a local centre within the SUE is important to its sustainability, in minimising the need for its residents to travel by car to access local facilities. The “community facilities” to be accommodated at the local centre with reference to the proposed Policy N5 could include youth facilities, while the healthcare facilities also cited in that policy could be provided within the local centre and/or through expansions of existing healthcare facilities in the locality.

4.9 The draft DFP indicates how the SUE can relate sensitively to Collingtree village and to the existing residential area of Collingtree Park. Those existing communities would be buffered by structural greenspace and by relatively low density development.

5. **General Soundness**

5.1 The proposed Policy N5 conforms to all four of the tests of soundness.

5.2 It is “positively prepared” in the sense that the SUE would contribute significantly to meeting the need for housing arising in the Plan area. It is also “positively prepared” in the sense that the SUE is specifically supported by NBC and all statutory consultees are working towards its expeditious delivery.

5.3 The SUE is fully “justified” in the sense that it is entirely suitable (see section 3 above). The robustness of the underpinning evidence base for the SUE has been reinforced further through the recent assessments undertaken on behalf of Bovis in preparing the Outline planning application (again, see section 3 above).

5.4 Policy N5 is fully “effective” in the sense that the SUE is readily deliverable (see section 4 above). The proposed policy is also “effective” in the sense that it is appropriately flexible, including by requiring that “in the region of” 1,000 homes are provided and by not specifying a level of detail that would be more appropriate to the consideration of a planning application.
5.5 By contrast, the alternative SUE proposed by local objectors (see para. 3.5 above) would not be “effective” in the sense that its largest part (SUE5/2) would not be demonstrably deliverable. That part of the proposed SUE would be accessed from Towcester Road to the west, across/under the railway line. That proposed access is not deliverable, because it would require the use of land not under the control of Bovis and would require the co-operation of Network Rail in agreeing the crossing of the railway line. Neither of these obstacles could be removed in the short term or at reasonable cost.

5.6 The SUE is “consistent with national policy” in that it complies fully with the NPPF. In particular:

- the SUE would be on “land of lesser environmental value” than much of the greenfield land within the Plan area (para. 17; and para. 3.1 above);
- its location is “sustainable” (para. 17; and section 3 above);
- Policy N5 provides for “a primary school and local shops within walking distance of most properties” within the SUE (para. 38); and
- Policy N5 would provide for a sustainable urban extension, in accordance with paragraph 52.

6. Common Ground

6.1 There is thus extensive common ground between the JPU and Bovis in respect of Policy N5.

6.2 Bovis' earlier objections to the policy focused on two matters: the proposed requirement for a primary school within the SUE; and the scope to enlarge the SUE to include land to the west, as far as the railway line.

6.3 In the light of the assessments undertaken in preparing the Outline planning application, which have indicated the lack of capacity at existing primary schools in the locality, Bovis now accepts the need to provide a primary school within the SUE. Indeed, the draft DFP (Appendix 1) depicts a site for this facility.

6.4 Bovis maintains there is scope to enlarge the SUE. Indeed, a SUE extending as far west as the railway line was put forward in the Emergent version of the JCS in 2009. Nevertheless, Bovis agrees that the land to the west of the currently proposed allocation appropriately could be considered through the forthcoming Northampton Related Development Area Local Plan, which will have a longer time horizon (2031) than the JCS. However, this will be a consideration for that Plan.

6.5 In summary, the following matters are agreed:
• the Northampton South SUE is a suitable and available site, and is deliverable within the timeframe of the Plan period;
• Policy N5 provides an appropriate framework that supports the delivery of the SUE, and is sound, being positively prepared, justified, effective and consistent with national policy;
• Bovis is committed to bringing the site forward for development within the timeframe anticipated in the JCS; and
• Bovis is actively engaged with the determining authorities on the preparation and submission of an Outline planning application consistent with the provisions of Policy N5.

6.6 There are no outstanding matters at issue in respect of Policy N5.

7. Conclusions

7.1 In conclusion, the proposed SUE is entirely suitable (section 3), readily deliverable (section 4), completely sound (section 5) and the subject of extensive common ground between the JPU and Bovis (section 6).

7.2 For all these reasons, the Inspector is respectfully requested to endorse this SUE.