

#105

COMPLETE

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Page 1

Q1 I agree to the Council collecting my personal data so that they can process my reply to the Northampton Local Plan (Part 2) Proposed Submission Draft Regulation 19. **I agree**

Page 2: Part A: Personal Details

Q2 Please provide your contact details in the boxes below. If you are an agent acting for another, please enter your client's details.

Name (required)	Katharine Banham
Job title (if appropriate)	Conservation Officer (Northamptonshire)
Organisation (where relevant)	The Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire
Address 1 (required)	Lings House
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Town	Northampton
Postcode (required)	NN3 8BE
Email Address	[REDACTED]
Phone Number	[REDACTED]

Q3 Are you making this representation as: **Other organisation (please specify type of organisation in next question)**

Q4 Please enter type of organisation (for example, planning consultant, etc.)

The Wildlife Trust is a local charity which aims to protect and restore the natural environment. We are supported by over 33,000 members across Northamptonshire, Bedfordshire & Cambridgeshire.

Page 3: Agent details

Q5 Please enter your details below: **Respondent skipped this question**

Page 4: Part B: Representation(s)

Q6 Do you consider the Northampton Local Plan Part 2 to be legally compliant? **No**

Page 5: Part B: Legal Compliance

Q7 Do you consider the document to be not legally compliant because it is: (please tick all that you think apply) **Not accompanied by a compliant Sustainability Appraisal**

Page 6: Part B: Soundness

Q8 Do you consider the Northampton Local Plan Part 2 to be sound? **No**

Page 7: Part B: Soundness

Q9 Do you consider the document to not be sound because it is: (please tick all that you think apply) **Not justified,
Not effective,
Not consistent with national policy**

Page 8: Part B: Representation(s) - Local Plan Part 2 draft

Q10 To which part of the Local Plan does this representation relate?

Policy number **25 Supporting and Enhancing Biodiversity**

Q11 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Policy 25 is confusing and inconsistent with the National Planning Policy Framework (NPPF) and other guidance. We have a series of concerns outlined below which mean that at present the Local Plan (Part 2) is not sound. We strongly recommend that the Policy is rewritten to include:

- A consistent approach to biodiversity net gain. The current policy requires all developments and only major developments to provide a net gain in biodiversity in different sentences. To be consistent with paragraph 170 of the NPPF the policy should require a net gain in biodiversity for all proposals. As the Chancellor of the Exchequer stated in the Spring Statement that biodiversity net gain will become mandatory in the near future, we should strongly recommend that the use of an agreed biodiversity metric is mentioned.
- Paragraph 171 of the NPPF requires Local Plans to distinguish between the hierarchy of international, national and locally designated sites. The current policy is incomplete and confusing in this respect. It should clearly state that proposals which are likely to have an adverse effect (either individually or in combination) on the Upper Nene Valley Gravel Pits SPA (Habitats Regulations) or Sites of Special Scientific Interest (NPPF paragraph 175) should be refused. At the local level we are pleased to see that the policy includes the protection and enhancement of Local Nature Reserves and Local Wildlife Sites but recommend that Local Geological Sites are also added and that the role which all these sites play within wider networks is referenced. Again, the wording should be strengthened to state that developments which would adversely affect these sites would not be permitted.
- The policy needs to include Priority Habitats and Species as included in the Natural Environment and Rural Communities Act, 2006 which places a duty on all public authorities to have regard to biodiversity across all their functions. The policy should clearly state that proposals which would have an adverse effect on protected or Priority Species or Priority Habitats would not be permitted.
- Indirect impacts, for example pressure from recreation activities, are a particular problem for biodiversity sites within Northampton Borough. We would strongly recommend that the policy states that indirect impacts or cumulative effects from other new or existing developments will need to be assessed by applications and suitable mitigation measures suggested. These mitigation measures should be maintained for the lifetime of the relevant development.
- Biodiversity networks are not mentioned within the policy or the wider document. Paragraph 174 of the NPPF states that “To protect and enhance biodiversity and geodiversity, plans should a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.” At present, the Local Plan (Part 2) does not comply with this section of the NPPF; wider ecological networks are not mapped, nor are there policies to safeguard them, and no mechanism is proposed to secure measurable net gains for biodiversity. We strongly recommend that the Policy and wider document is updated to conform to the NPPF in regard to habitat networks.
- The last sentence of the current policy covers the need for applications to undertake an ecological survey as part of their application. To ensure that this part of the policy reflects industry guidance we would recommend that it is updated. The similar section from the Central Bedfordshire Local Plan could be used as a model. It reads: “Up to date, comprehensive ecological surveys undertaken in accordance with industry guidelines and standards will be required to support and inform development proposals that would affect sites for nature conservation, protected species, or species and habitats of principal importance demonstrating development will deliver a net gain.”

Q12 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Q13 To which part of the Local Plan does this representation relate?

Policy number

26 Upper Nene Valley Gravel Pits Special Protection Area

Q14 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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 Upper Nene Valley Gravel Pits SPA and Ramsar Site has been internationally recognised for its importance to non-breeding waterbirds. Pressure from recreation is one of the biggest threats to the SPA as it can disturb the birds reducing their feeding efficiency. Northampton Borough includes part of the Clifford Hill Gravel Pits/Northampton Washlands section of the SPA along with land functionally linked to it. Due to their location, the Northampton Washlands are already suffering from a high level of recreational disturbance; a point raised in the West Northamptonshire Joint Core Strategy Local Plan (Part 1) in paragraphs 10.26 and 10.27 and within the Habitats Regulations Assessment (HRA) which accompanies this Local Plan (Part 2). It is, therefore, of great concern to us that Policy 26 is weak and not consistent with the HRA or the requirements of the international designation. In our view it would be ineffective in providing protection for the SPA, particularly when the cumulative impacts of developments are considered. The HRA provided additional text for inclusion within the policy which included greater clarity regarding mitigation measures and the need to create a strategic mitigation strategy for the Northampton Washlands, agreed with Natural England, prior to the adoption of the Local Plan. The HRA clearly states that without these measures the Local Plan (Part 2) could have adverse effects on the integrity of the SPA. These findings from the HRA have not been incorporated into the Local Plan (Part 2) which shows a disregard for the SPA and results in the Plan being not sound or legally compliant.

The mitigation hierarchy contained within the National Planning Policy Framework (NPPF) paragraph 175 has avoidance as the first step. It should not be assumed that mitigation for all schemes will be possible. Any proposal within the SPA, or on land functionally linked to it, should be avoided as a first step. Mitigation measures should only be used as a second step and then only when designed using up-to-date survey information and in accordance with the Mitigation Strategy for the Northampton Washlands which has not been prepared. We would advise that these deficiencies need to be resolved before the Plan is adopted, otherwise the Plan will not be compliant with European legislation, and the domestic legislation derived from it.

Q15 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 10: Part B: Representation(s) - Local Plan Part 2 draft (3/20)

Q16 To which part of the Local Plan does this representation relate?

Paragraph number

182-4

Q17 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

These paragraphs should outline the importance of the Upper Nene Valley Gravel Pits Special Protection Area (SPA) as well as highlighting its value within Northampton Borough and the particular challenges the SPA faces locally. Although these sections mention the Clifford Hill Gravel Pits, the need for mitigation measures and references the SPA SPD, they are very broad and do not focus on the Local Plan (Part 2) area. This failure to recognise the biodiversity assets within the Borough is a theme which runs through the document and needs to be addressed for the Plan to be consistent with national policy.

Q18 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 11: Part B: Representation(s) - Local Plan Part 2 draft (4/20)

Q19 To which part of the Local Plan does this representation relate?

Paragraph number **180-181**

Q20 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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 opening sentence of the Biodiversity section is astonishing. To open the topic with a statement that calls for development at any cost is not in accordance with the Council's duty under the Natural Environment and Rural Communities Act, 2006 nor is it in line with National Planning Policy Framework (NPPF), which sets out in paragraph 8 that economic, social and environmental gains are the objectives of planning, and are interdependent, nor with the adopted Biodiversity SPD. Whilst Northampton is a compact urban area these two paragraphs should be used to recognise the biodiversity assets and networks that already exist and include plans to protect and enhance them through new developments. To reflect the NPPF paragraphs 171 and 174 this section should recognise the hierarchy of sites within the Borough (Upper Nene Valley Gravel Pits SPA, 1 SSSI, 6 LNR, and 48 LWS). It should also highlight Priority Habitats and Species of particular relevance, for example, the calcareous grasslands at Bradlaugh Fields and Kingsthorpe Meadows, and the biodiversity network along the River Nene and its associated wetlands, grasslands and tributaries, in particular the Brampton Arm. These paragraphs should also refer to the importance of parks, gardens and other semi-natural open spaces across the Borough and the role they play in bringing people close to nature. This could also link to the positive impact that nature has on people's health and wellbeing. The challenges facing biodiversity within Northampton Borough should also be identified. Of particular importance is the impact of recreational pressure, both in terms of disturbance to wildlife and also the challenges of managing urban sites e.g. vandalism, litter, dogs off leads; both on the SPA and other wildlife sites. Other challenges include habitat loss, lack of appropriate management, climate change and non-native invasive species.

Q21 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 12: Part B: Representation(s) - Local Plan Part 2 draft (5/20)

Q22 To which part of the Local Plan does this representation relate?

Paragraph number **72, 200 & 221**

Policy number **30 Transport Schemes and Mitigation**

Q23 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Policy 30 seeks to safeguard the route of the former Northampton to Market Harborough railway line for future use, a proposal which is also mentioned in paragraphs 72, 200 and 221. This route has already been identified as a series of Local Wildlife Sites (LWS) because of the species rich neutral grasslands (a Priority Habitat under the Natural Environment and Rural Communities Act, 2006) found within them, as well as the wildlife corridor that it provides. It plays a significant role in the wider biodiversity network. This element of Policy 30 needs to recognise the major impact it would have on biodiversity. It should only be included if the need is established and all the alternatives have been assessed and a new rail route has been identified, by an SEA, as the most suitable alternative. It would also need to establish that the scheme would be able to achieve a net gain in biodiversity. The safeguarding of the railway for future transport uses is in conflict with Policy 25 (Biodiversity) and Policy 23 (Green Infrastructure) of this Local Plan which seek to protect LWS and the wider Green Infrastructure network. It is also not in line with Policy BN2 (Biodiversity) within the West Northamptonshire Joint Core Strategy Local Plan (Part 1) which requires applications to demonstrate how they will safeguard designated sites, protected species and Priority Habitats. The proposal in Policy 30 does not mention the biodiversity value of the former railway line nor is it mentioned within the associated paragraphs.

Q24 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 13: Part B: Representation(s) - Local Plan Part 2 draft (6/20)

Q25 To which part of the Local Plan does this representation relate?

Policy number

Policy Number: 33 Site Allocations – Site 1100 Hill Farm Rise, Hunsbury Hill

Q26 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Site 1100 at Hill Farm Rise, Hunsbury Hill is included within Policy 33 for the development of 90 dwellings. Whilst we are pleased to see that the Site Allocation Methodology and Land Availability Assessment correctly identifies that the allocation includes part of Wootton Railway Embankment Local Wildlife Site (LWS) and woodland (which need to be protected should the development proceed), we are concerned that there may be Priority Habitat grasslands (included within the Natural Environment and Rural Communities Act, 2006) outside of the LWS which would also need to be protected. We would recommend that a biodiversity assessment is carried out to guide this allocation as soon as possible as it may not be able to accommodate as many dwellings as anticipated, making the plan ineffective.

Q27 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 14: Part B: Representation(s) - Local Plan Part 2 draft (7/20)

Q28 To which part of the Local Plan does this representation relate?

Policy number

Policy 33 Site Allocations – Site 1098 The Green, Great Houghton & Policy 36

Q29 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

This allocation is specifically mentioned in the Habitat Regulations Assessment (HRA). The HRA clearly states that the allocation has the potential to cause harm to the Upper Nene Valley Gravel Pits Special Protected Area (SPA) through increased recreational pressure on the Northampton Washlands and through the development of land functionally linked to the SPA. The Northampton Washlands are already being degraded by excessive recreational pressure, particularly from dogs disturbing the birds for which the SPA was identified. There is no mitigation plan in place to tackle the existing problems and therefore allocating further housing development in the area is not appropriate. The HRA requested that over-wintering bird surveys should be conducted to investigate the importance of the allocation to the SPA and, using the results of these surveys, to suggest suitable mitigation measures; if it is possible to do so. Given how clearly this is stated in the HRA is it very surprising that Policy 36 does not mention the SPA or the need for additional survey work. It is also not included in the entry for this site in the Site Allocation Methodology and Land Availability Assessment. The area suggested for ecological enhancement within the proposal seems to have been chosen for landscape rather than biodiversity reasons and is likely to be used for recreation and therefore to be highly disturbed. This would make it unsuitable for SPA mitigation. The importance and reasons for the designation of the SPA have not been reflected by this policy. It is not in line with the HRA, and therefore inconsistent with European legislation and the domestic legislation derived from it, nor with Policy 26 of this Local Plan (Part 2). We object to this allocation and recommend that it is removed from the document.

Q30 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 15: Part B: Representation(s) - Local Plan Part 2 draft (8/20)

Q31 To which part of the Local Plan does this representation relate?

Policy number

Policy 33 – Site 1094 Land off Holmecross Road

Q32 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

This allocation is adjacent to Billing Arbours Woodland Local Wildlife Site (LWS). Whilst the woodland is not included within the proposal it would be affected by it due to the increase in visitor numbers associated with the development. We would strongly recommend that any allocation on this site contributes to the management of the woodland LWS for the lifetime of the development to prevent the degradation of the woodland. This should be mentioned in the policy or within the Site Allocation Methodology and Land Availability Assessment. At present it is not in line with Policy 25.

Q33 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 16: Part B: Representation(s) - Local Plan Part 2 draft (9/20)

Q34 To which part of the Local Plan does this representation relate?

Policy number

Policy 33 – Site 1005 North of Martin's Yard, Spencer Bridge Road & Policy 35

Q35 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

As highlighted in the Site Allocation Methodology and Land Availability Assessment this site allocation will require considerable ecological enhancements to be associated with it to ensure that it produces a net gain in biodiversity as required by paragraph 170 of the National Planning Policy Framework. It includes habitat designated as Kingsthorpe Mire Local Wildlife Site (LWS), a wetland site which is uncommon in the county and part of a wider biodiversity network which extends to the north. Whilst we appreciate that some development may be possible within the area highlighted in Policy 35, the remaining part of the site will require careful management for the lifetime of the development to ensure that it does not become degraded.

Q36 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 17: Part B: Representation(s) - Local Plan Part 2 draft (9/20)

Q37 To which part of the Local Plan does this representation relate?

Policy number

Policy 33 – Site 0403 Allotments, Studland Road

Q38 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Within the red line boundary for this allocation shown within the Site Allocation Methodology and Land Availability Assessment is a section of Kingsthorpe Meadows Local Wildlife Site (LWS) which is also a Local Nature Reserve (LNR) and is currently managed by the Wildlife Trust. The development of land which has been identified as a LNR and LWS is contrary to Policy 25 (Biodiversity) of this Local Plan (Part 2) and is also not in line with Policy BN2 (Biodiversity) within the West Northamptonshire Joint Core Strategy Local Plan (Part 1), which requires applications to demonstrate how they will safeguard designated sites, protected species and Priority Habitats. Whilst the area within the allocation may not be the most species rich section, any loss from this site which already receives a high number of visitors is unacceptable. Neither the Local Plan (Part 2) nor the Allocation Methodology and Land Availability Assessment mention the designations attached to this site. Therefore, as the ecological value of the area has not been adequately assessed and no suitable mitigation has been considered this allocation should be removed from the Plan.

Q39 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 18: Part B: Representation(s) - Local Plan Part 2 draft (10/20)

Q40 To which part of the Local Plan does this representation relate?

Paragraph number

74 Vision

Q41 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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 third paragraph of the Vision makes reference to the aspiration to be a leading example of low environmental impact and resilient development in response to climate change. Whilst we support this aim it seems to have been forgotten through the rest of the Local Plan (Part 2). Protecting and enhancing biodiversity is a key part in achieving a low environmental impact. The National Planning Policy Framework requires a net gain in biodiversity within developments, which the Government has stated will be underpinned by specific statute in the near future. The need to protect and enhance biodiversity should be clearly stated within the vision. This could be achieved by including a 'network of biodiversity-rich greenspaces' within the text. We would also recommend that the link between providing good semi-natural greenspaces and increased wellbeing is mentioned as a clear link between the environment and health sections of the Local Plan (Part 2).

Q42 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 19: Part B: Representation(s) - Local Plan Part 2 draft (11/20)

Q43 To which part of the Local Plan does this representation relate?

Paragraph number

Objective 10 – Green Infrastructure

Q44 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

We strongly recommend that the wording of this objective is revisited as at present it is confusing and not in line with national policy. This objective considers green infrastructure and therefore the suite of green infrastructure themes, along with the need to properly consider and integrate them into developments at the earliest stage, should be included within it. Whilst we are pleased to see that the objective includes the conservation of natural habitats and species, it needs to go further to protect Priority Species and Habitats in accordance with the Council's duties under the Natural Environment and Rural Communities Act, 2006. The reference to net gain should not be an aim that the Council 'seeks to' do but a commitment as included within the National Planning Policy Framework (NPPF) paragraph 170, which the Government has stated will be underpinned by specific statute in the near future. Alongside maintaining and enhancing networks of habitats and green infrastructure the NPPF paragraph 171 also requires Local Authorities to 'plan for the enhancement of natural capital'. We would strongly recommend that Natural Capital is included within Objective 10.

Q45 Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 20: Part B: Representation(s) - Local Plan Part 2 draft (12/20)

Q46 To which part of the Local Plan does this representation relate?

Policy number

22 Sites for Burial Space

Q47 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Two sites for additional burial space have been proposed within the Local Plan (Part 2). We would strongly recommend that thorough ecological assessments of both are conducted prior to their designation as burial sites. Whilst the proposed extension to Kingsthorpe Cemetery is not an area which has been recognised for biodiversity, it does contain grassland habitat which would be worthy of further survey to assess its significance. The layout of the burial area should be designed around the results of this assessment. The site at Dallington is on grassland immediately adjacent to/including (the map at this scale is unclear) Dallington Brook Field Local Wildlife Site. This site has been recognised for its importance to biodiversity and should be protected through the planning process. Again we would strongly recommend further ecological assessment of the area which is then used to guide the layout of the proposal.

Q48 Do you wish to comment on other parts of the draft Local Plan? **No**

Page 21: Part B: Representation(s) - Local Plan Part 2 draft (13/20)

Q49 To which part of the Local Plan does this representation relate?	Respondent skipped this question
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Q50 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.	Respondent skipped this question
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Q51 Do you wish to comment on other parts of the draft Local Plan?	Respondent skipped this question
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Page 22: Part B: Representation(s) - Local Plan Part 2 draft (14/20)

Q52 To which part of the Local Plan does this representation relate?	Respondent skipped this question
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Q53 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.	Respondent skipped this question
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Q54 Do you wish to comment on other parts of the draft Local Plan?	Respondent skipped this question
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Page 23: Part B: Representation(s) - Local Plan Part 2 draft (15/20)

Q55 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q56 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Respondent skipped this question

Q57 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 24: Part B: Representation(s) - Local Plan Part 2 draft (16/20)

Q58 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q59 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Respondent skipped this question

Q60 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 25: Part B: Representation(s) - Local Plan Part 2 draft (17/20)

Q61 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q62 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Respondent skipped this question

Q63 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 26: Part B: Representation(s) - Local Plan Part 2 draft (18/20)

Q64 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q65 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Respondent skipped this question

Q66 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 27: Part B: Representation(s) - Local Plan Part 2 draft (19/20)

Q67 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q68 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Respondent skipped this question

Q69 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

Page 28: Part B: Representation(s) - Local Plan Part 2 draft (20/20)

Q70 To which part of the Local Plan does this representation relate?

Respondent skipped this question

Q71 Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft 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.

Respondent skipped this question

Page 29: Part B: Representation(s) - Sustainability Appraisal

Q72 Do you wish to comment on the Sustainability Appraisal?

No

Page 30: Part B: Representation(s) - Sustainability Appraisal

Q73 To which part of the Sustainability Appraisal does this representation relate?	Respondent skipped this question
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Q74 Comments	Respondent skipped this question
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Q75 Do you wish to comment on other parts of the Sustainability Appraisal?	Respondent skipped this question
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Page 31: Part B: Representation(s) - Sustainability Appraisal (2/6)

Q76 To which part of the Sustainability Appraisal does this representation relate?	Respondent skipped this question
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Q77 Comments	Respondent skipped this question
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Q78 Do you wish to comment on other parts of the Sustainability Appraisal?	Respondent skipped this question
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Page 32: Part B: Representation(s) - Sustainability Appraisal (3/6)

Q79 To which part of the Sustainability Appraisal does this representation relate?	Respondent skipped this question
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Q80 Comments	Respondent skipped this question
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Q81 Do you wish to comment on other parts of the Sustainability Appraisal?	Respondent skipped this question
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Page 33: Part B: Representation(s) - Sustainability Appraisal (4/6)

Q82 To which part of the Sustainability Appraisal does this representation relate?	Respondent skipped this question
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Q83 Comments	Respondent skipped this question
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Q84 Do you wish to comment on other parts of the Sustainability Appraisal?	Respondent skipped this question
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Page 34: Part B: Representation(s) - Sustainability Appraisal (5/6)

Q85 To which part of the Sustainability Appraisal does this representation relate?	Respondent skipped this question
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Q86 Comments	Respondent skipped this question
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Q87 Do you wish to comment on other parts of the Sustainability Appraisal?	Respondent skipped this question
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Page 35: Part B: Representation(s) - Sustainability Appraisal (6/6)

Q88 To which part of the Sustainability Appraisal does this representation relate?	Respondent skipped this question
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Q89 Comments	Respondent skipped this question
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Page 36: Part B: Representation(s) - Habitats Regulation Assessment

Q90 Do you wish to comment on the Habitats Regulation Assessment?	No
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Page 37: Part B: Representation(s) - Habitats Regulations Assessment

Q91 To which part of the Habitats Regulations Assessment does this representation relate?	Respondent skipped this question
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Q92 Comments	Respondent skipped this question
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Q93 Do you wish to comment on other parts of the Habitats Regulations Assessment?	Respondent skipped this question
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Page 38: Part B: Representation(s) - Habitats Regulations Assessment (2/6)

Q94 To which part of the Habitats Regulations Assessment does this representation relate?	Respondent skipped this question
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Q95 Comments	Respondent skipped this question
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Q96 Do you wish to comment on other parts of the Habitats Regulations Assessment?	Respondent skipped this question
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Page 39: Part B: Representation(s) - Habitats Regulations Assessment (3/6)

Q97 To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

Q98 Comments

Respondent skipped this question

Q99 Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

Page 40: Part B: Representation(s) - Habitats Regulations Assessment (4/6)

Q100 To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

Q101 Comments

Respondent skipped this question

Q102 Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

Page 41: Part B: Representation(s) - Habitats Regulations Assessment (5/6)

Q103 To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

Q104 Comments

Respondent skipped this question

Q105 Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

Page 42: Part B: Representation(s) - Habitats Regulations Assessment (6/6)

Q106 To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

Q107 Comments

Respondent skipped this question

Page 43: Part B: Representation(s) - Examination

Q108 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?

Yes

Q109 If you wish to take part at the oral 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))

As we believe that the Northampton Local Plan Part 2 (Submission Draft) is neither sound nor legally compliant on issues concerning biodiversity we would strongly recommend that it is revisited prior to submission. We would be happy to help with this process. Should the Plan proceed unmodified we would like to take part in the oral examination to ensure that our concerns are adequately taken into account and to respond to any reply from the local authority following our submission to the consultation.

Q110 Do you wish to be notified when:

The Council submit the Northampton Local Plan (Part 2) to the Government?

,

The Inspector's report is published?,

The Northampton Local Plan (Part 2) is adopted by the Council

Page 44: Equality Monitoring

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