

From: Katie Hancock <[REDACTED]>
Sent: 12 June 2019 13:14
To: Planning Policy
Cc: Gary Lees
Subject: RE: Local Plan Part 2 consultation submission

Hi Mike,

It would be Davidsons Developments and L & Q Estates.

Thanks,

Katie

Katie Hancock
Planner

Pegasus Group

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4 The Courtyard | Church Street | Lockington | Derbyshire | DE74 2SL

T [REDACTED] | E [REDACTED]
DD [REDACTED] | EXT [REDACTED]


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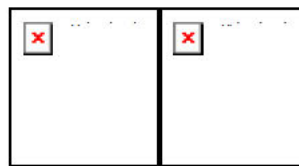


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From: [REDACTED] On Behalf Of Planning Policy
Sent: 12 June 2019 12:10
To: Katie Hancock <[REDACTED]>
Cc: Gary Lees [REDACTED]
Subject: RE: Local Plan Part 2 consultation submission

Hi

I notice that you've put yourself down as an agent but not the name of who you're representing? Could you either resubmit the form or let me know and I'll add it please?

Thanks very much

Mike

[REDACTED]

Planning Service | Northampton Borough Council | The Guildhall, St Giles Square, Northampton NN1 1DE |
0300 330 7000

Customer Feedback

We would like your feedback to help us maintain and continually improve the standard of services we provide. As a customer of the Regeneration, Enterprise and Planning Directorate it would help us if you could take a moment to complete the online [survey](#) about your experience.

Any personal information you do provide to us will be held on a computer database. Your personal information will only be used by, and on behalf of, Northampton Borough Council in improving the service we provide to our customers.

Northampton Borough Council has adopted a Community Infrastructure Levy (CIL) Charging Schedule. All planning applications for liable developments submitted and granted permission after 1st April 2016 will have to pay the levy. The charge only applies to residential development and to retail developments of more than 100 square metres outside the town centre. You can find out more about Northampton's CIL, including full details of which developments are liable and which are exempt by clicking here: <http://www.northampton.gov.uk/cil>

From: Katie Hancock [REDACTED]
Sent: 12 June 2019 11:32
To: Planning Policy [REDACTED]
Cc: Gary Lees <[REDACTED]>
Subject: Local Plan Part 2 consultation submission

Hello,

Please can I submit the following representation to the Northampton Local Plan Part 2 Proposed Submission Draft consultation.

Please can you confirm receipt of this submission.

Kind regards,

Katie

Katie Hancock
Planner

Pegasus Group

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4 The Courtyard | Church Street | Lockington | Derbyshire | DE74 2SL

[REDACTED]

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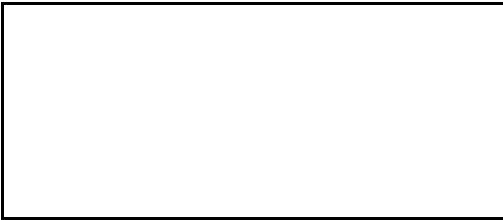
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REPRESENTATION FORM FOR THE NORTHAMPTON LOCAL PLAN PART 2 PROPOSED SUBMISSION DRAFT (REGULATION 19 CONSULTATION)

Northampton Borough Council is preparing a Local Plan Part 2 for the Borough which will supplement the West Northamptonshire Joint Core Strategy and will replace Saved Policies in the Northampton Borough Council Local Plan (1997). The Local Plan Part 2 will cover the period to 2029. This stage is the Proposed Submission Draft Local Plan Part 2 (Regulation 19) and is the version of the plan that the Council intends to submit to the Planning Inspectorate for independent examination.

This form should be used to make representations on the Northampton Borough Council Local Plan Part 2 Draft Submission.

You can submit your representation online using our electronic form through the link below:

www.northampton.gov.uk/lp2proposedsubmission

A downloadable version (MS Word) is also available on the same page.

Under the General Data Protection Regulation (GDPR), Northampton Borough 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 the 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 Northampton Borough Council's Privacy Policy here:

<https://www.northampton.gov.uk/info/200031/data-protection/175/data-protection>

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 Northampton Local Plan Part 2 Proposed Submission Draft Regulation 19.

☒

Yes (please tick)

**Please complete and submit by 5pm on Friday 14 June 2019.
Responses received after this time will not be accepted**

Ref:

(For official use only)

This form has 2 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

Q1: 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 organisation (please specify which type of organisation below):

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in column 2.*

	Personal Details	Agent's Details (if applicable)
Title		Mr
First name		Gary
Last name		Lees
Job title (where relevant)		Executive Director
Organisation (where relevant)	Davidsons Developments / L&Q estates	Pegasus Group
Address line 1		4 The Courtyard
Line 2		Church Street
Line 3		Lockington
City / Town		Derby
County		Derbyshire
Postcode		DE74 2SL
Telephone number		
Email (if provided we will always contact you this way)		

Part B: Representation(s)

Please use a separate sheet for each representation

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Please note all comments will be made publicly 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 Northampton Local Plan Part 2 to be legally compliant?	Yes	<input checked="" type="checkbox"/>	No	
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 cooperate				
Not accompanied by a compliant Sustainability Appraisal				

2 (1): Please give details of why you consider the Northampton Local Plan Part 2 Submission Draft document is not legally compliant. Please be as precise as possible.

The Council has failed to properly investigate other options for addressing the shortfall in housing provision through discussions with adjoining authorities, including Wellingborough District Council.

3: Do you consider the Northampton Local Plan Part 2 to be sound?	Yes		No	<input checked="" type="checkbox"/>
--	-----	--	----	-------------------------------------

3 (1): If NO, is this because it is: (please tick all that you think apply)

Not positively prepared	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input checked="" type="checkbox"/>
Not consistent with national policy	

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
		Policy 13	

4 (1): 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.

Paragraph 7 of the Framework states that in performing a social role the planning system is required to provide a supply of housing required to meeting the needs of the present *and* future generations. Furthermore, paragraph 50 states that in order to deliver a wide choice of homes local planning authorities should plan for a mix of housing based on current and future demographic trends. It also states that local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

By identifying an exact percentage for the proportion of houses with specific bedroom amounts, Policy 13 sets out a very prescriptive approach to the required housing mix across the Borough. No consideration has been given to the existing housing market and in particular no consideration has been given to local demand as required by paragraph 50 of the Framework. Only allowing exceptions to this mix where proposals are supported by a robust assessment of needs at a local level is unduly onerous and contrary to the Framework.

The evidence base on which the housing mix and type is prescribed under Policy 13 is the West Northamptonshire Joint Planning Unit Housing Market Evidence of 2017. Figure 32 on page 60 of this report sets out a purported housing mix for both market and affordable housing. This appear to be based on the housing mix needed by household of each household type and age and apparently uses the ORS Housing Model. Policy 13 has then taken these figures verbatim and presented them as the required mix percentages. No details are provided as to how the model has established this mix and no further consideration has been given to local circumstances, demand or market.

Furthermore, Paragraph 50 of the Framework states that local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. It is clear that the evidence base underpinning Policy 13 is only based on need. No consideration has been given to local housing demand, which will vary in different locations across the borough and also over the life of the Plan.

Finally, no consideration has been given to site characteristics and context; a site in the centre of the town would more appropriately accommodate a higher density mix with

smaller unit sizes. This should be a further factor to inform an appropriate housing mix for each site.

It is considered that this policy is not justified as it is not based on proportionate evidence and it is not consistent with national policy.

In order for this policy to be justified and consistent with national policy, it is considered that it should be deleted or significantly modified in respect of the housing mix. One approach would be to set the percentage figure for each dwelling size as a target and to also identify a more flexible range which would be acceptable. For example, the target for 2-bedroom dwellings is 20% but an acceptable range could be from 15-25%. Such an approach has been adopted in Leeds Core Strategy of November 2014 under Policy H4, an extract of which is attached. This approach would create a more flexible range which could be tailored to different locations in the borough, based on local demand as required by the Framework, and other material factors such as site context.

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.

SUSTAINABILITY APPRAISAL

5. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number).

Paragraph	
Comments	

HABITATS REGULATIONS ASSESSMENT

6. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number).

Paragraph	
Comments	

7: 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	✓
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8: 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))

We have significant concerns regarding the overly onerous requirement of Policy 13 that fails to take account of local circumstances and demand. It is important therefore that we are represented at the Examination.

9: Please tick a box if you wish to be notified of further progress of the Local Plan Part 2 (please tick all that apply)

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

10: Signature		Date	12/06/19
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**Thank you for taking the time to complete the form.
Please return it to:**

Email:



By post or by hand to:

Northampton Borough Council

Planning Policy, The Guildhall, St Giles Square, Northampton, NN1 1DE

