

#50

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)	Miss Ann Plackett
Address 1 (required)	[REDACTED]
Address 2	[REDACTED]
Town	[REDACTED]
Postcode (required)	[REDACTED]
Email Address	[REDACTED]
Phone Number	[REDACTED]

Q3 Are you making this representation as: **Resident or member of the general public**

Q4 Please enter type of organisation (for example, planning consultant, etc.) **Respondent skipped this question**

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? **Yes**

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)

Respondent skipped this question

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 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

Policy 22

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.

This site was referred to in the draft Northampton Borough Council Scrutiny Panel Report on cemeteries, April 2018, as the 'Goat Field'. [REDACTED] I am familiar with its conservation value and submitted comments to the Panel, although these were never acknowledged or referred to in the final report. This land has never been developed and is shown on the 19th century historic OS maps as rough pasture. As a result, although it does not have significant plant diversity, it is covered with large ant hills. These attract green woodpeckers, which I regularly hear calling. They have also bred in the area. This must one of only a few sites in the area which provide feeding areas for green woodpeckers. There is also a fox den in the field. Since the removal of the sheep and goats, gorse is beginning to invade the site.

Although the Sustainability Appraisal gives a score of the impact of the policy on biodiversity as 'significant negative effect likely', this seems to relate to the Dallington proposal and the ecological value of the Kingsthorpe proposal has not been recognised. I do recognise the need for more space for burials, but the use of this site needs to be consistent with Policy 25 Supporting and enhancing biodiversity, where it states that development should 'conserve, enhance and increase the net gain for biodiversity, including sites of local importance'. While Policy 22 does refer to 'securing the enhancement of the role that burial grounds play... including its ecological and heritage values', the development of this site will result in the loss of biodiversity.

There are two options that should be considered. Firstly, given the proposed housing development on land at Buckton Fields that was to have become a pocket park, this site might be considered as an alternative, although its nature may preclude this option. As an alternative option, it should clearly state in the plan that, before its development as a burial ground, the site should be subject to an ecological survey, in order to develop a management plan to ensure that at least part of the site is preserved as rough pasture with the ant hills preserved and its management is agreed, e.g. the need for strimming and removal of gorse, as appropriate. A more natural approach to the management of this extension could be consistent with an area allocated for natural burials.

In view of this, I consider that the policy is not consistent with national policy as it does not adequately reflect the environmental objective of sustainable development as set out in paragraph 8c) of the NPPF 2018. Nor is it justified based upon the evidence of the ecological value of the site.

Recommendation

If the use of this land as a burial site is considered to be acceptable, an additional paragraph should be included recognising the ecological value of the site and the need for a management plan to minimise the loss of habitat. Suggested wording is as follows: 'The site proposed for the extension of the Kingsthorpe Cemetery is an area of old grassland with large anthills which benefit a number of species, notably green woodpeckers; it is an uncommon habitat in this area of the county. Thus, when the site is developed, a section of the field, as identified by a trained ecologist, should be preserved and an appropriate management plan agreed.'

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

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

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

Policy number

Vision - climate change

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 plan includes reference in the Vision to responding to climate change, i.e. 'The Borough will also be a leading example of low environmental impact and resilient development in response to climate change' While I can support the aspiration of the Vision, the actual content of the plan lacks ambition and needs to be more proactive with regard to this issue, which should be a generic theme of the plan. The nature of the current policies is much the same as policies that have been part of the planning framework for the County for at least a decade. The NPPF's approach to climate change demands a proactive approach, e.g. paragraph 151 states that the plan should 'provide a positive approach for (renewable) energy'.

The urgency of responding to the challenge of climate change has been highlighted by the recent international and cross-party parliamentary climate change committee reports. While this issue will not be effectively addressed unless there is international and national action, local action is also needed and the Vision needs to be supported by more proactive policies/ action. In the light of this, I consider the plan to be unsound as not being justified or effective with respect to this issue.

Recommendations

The Borough (or its successor) should commit to developing a Climate Change and Biodiversity Action Plan that takes forward measures set out in the Plan, including sustainable transport. Set out below are some examples on how the plan could be strengthened with respect to this issue and improve the resilience of the Borough to respond to the challenge of climate change: Paragraph 89, page 36 and Policy 5 Sustainable Construction – While this policy promotes sustainable construction and paragraph 89 states that 'the majority of new buildings are now being designed to maximise the potential for roof top solar gain', this approach could be strengthened by requiring that all new development should have solar panels or other sources of renewable energy, such as ground source heat pumps, as well as high levels of insulation, with a view to being zero carbon within the plan period. This should apply to industrial buildings as well as housing. For example, the flat roofs of warehouses should have solar panels. Where possible, the use of renewable energy should be required with respect to planning applications for conversions etc, subject to the need to protect listed buildings and conservation areas.

Policy 5 Water supplies –It is acknowledged that the eastern part of the country is an area of low rainfall and action will need to be taken to secure water supplies, without having adverse effects on biodiversity and agriculture, especially if the proposed level of future development associated with the proposed Oxford – Cambridge Arc is realised. It is welcomed that Policy 5 requires that 'residential development should demonstrate that dwellings meet the Building Regulation optional higher water efficiency standard'. However, this approach needs to apply to all types of development. The Plan could also actively encourage the development and use of grey water systems.

Paragraph 130 and Policy 13 recognise the demand for self-build, which usually has higher standards of energy conservation etc. The Plan could be more proactive by working with landowners to identify a specific allocation(s) of land set aside for this purpose, as has been done at Bicester (Graven Hill).

Urban greening – The Borough should develop an action plan for the greening of the town, including the town centre. This would have many benefits, including, urban cooling, air pollution mitigation, enhancing biodiversity and promoting well-being. One possible project, which was discussed in the context of the Central Area Action Plan, is the creation of a boulevard along Horsemarket/ Broad Street.

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

Paragraph 70, page 27 Paragraph 72 Paragraph 221, page 94

Policy number

Vision (page 28)

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.

Oxford – Cambridge Corridor and Northampton to Market Harborough Railway line

The Vision states that 'By 2029 Northampton will be the heart of the Oxford- Cambridge Corridor' (see also paragraph 70). Paragraphs 72 and 221 refer to the possibility of providing new transport links along the alignment of the former Northampton- Market Harborough as part of the Oxford – Cambridge Arc project.

It appears that the decision to be part of the project has been taken by councillors without public consultation and scrutiny. Further, it is premature to include reference to the project in the Local Plan, as it has not been tested at the strategic planning level, as part of the review of the West Northamptonshire Joint Core Strategy. Specifically, the implications of this decision in terms of the principle, amount and location of development and strategic infrastructure have not been tested through the planning system at the strategic level. This includes the possibility of providing new transport links along the alignment of the former Northampton- Market Harborough railway line in the Brampton Valley.

The Brampton Valley should be recognised as an important green infrastructure corridor, as identified in the adopted West Northamptonshire Joint Core Strategy 2014 (Figure 6), not a transport corridor. It remains a quiet area of significant local landscape value (formerly a Special Landscape Area), with significant biodiversity, historic, recreational and tourism value. Part of the line is run as a recreational route for the Brampton-Pitsford Railway (steam and heritage diesel tourist/ museum railway) and it is part of the national Sustrans cycle route. It is also heavily used by local walkers. The area includes as a number of nationally designated historic sites, including Boughton Hall registered park and garden, Lamport Hall and the Saxon Church at Brixworth, the setting of which would be affected by development in the valley.

Thus, I consider that this aspect of the Vision and the reference to the transport link is unsound as it has not been justified and is not consistent with national policy with respect to the policies in the NPPF relating to the natural and historic environment, as set out in Sections 15 and 16.

Recommendations

The reference to the Oxford-Cambridge Corridor in the Vision should be deleted, until it has been tested by the review of the West Northamptonshire Joint Core Strategy. Similarly, references to the Northampton-Market Harborough in paragraphs 72 and 221 should be removed.

Q18 Do you wish to comment on other parts of the draft Local Plan? **No**

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?

Respondent skipped this question

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.

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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.

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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.

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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.

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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.

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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.

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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.

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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.

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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.

Respondent skipped this question

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

Respondent skipped this question

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?

Respondent skipped this question

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.

Respondent skipped this question

Q48 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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

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

Q51 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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

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

Q54 Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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

Q74 Comments

Respondent skipped this question

Q75 Do you wish to comment on other parts of the Sustainability Appraisal?

Respondent skipped this question

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

Q77 Comments

Respondent skipped this question

Q78 Do you wish to comment on other parts of the Sustainability Appraisal?

Respondent skipped this question

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

Q80 Comments

Respondent skipped this question

Q81 Do you wish to comment on other parts of the Sustainability Appraisal?

Respondent skipped this question

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

Q83 Comments

Respondent skipped this question

Q84 Do you wish to comment on other parts of the Sustainability Appraisal?

Respondent skipped this question

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

Q86 Comments

Respondent skipped this question

Q87 Do you wish to comment on other parts of the Sustainability Appraisal?

Respondent skipped this question

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

Q89 Comments

Respondent skipped this question

Page 36: Part B: Representation(s) - Habitats Regulation Assessment

Q90 Do you wish to comment on the Habitats Regulation Assessment? **No**

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**

Q92 Comments **Respondent skipped this question**

Q93 Do you wish to comment on other parts of the Habitats Regulations Assessment? **Respondent skipped this question**

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**

Q95 Comments **Respondent skipped this question**

Q96 Do you wish to comment on other parts of the Habitats Regulations Assessment? **Respondent skipped this question**

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?

No

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))

With reference to the above, I would consider appearing at the examination, if the Inspector felt that it would be helpful, but I consider that I have probably covered the points that I wish to make in my representations.

Q110 Do you wish to be notified when:

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

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The Inspector's report is published?,

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