

Mike Burgess

From: A. R. Yarwood <[REDACTED]>
Sent: 12 June 2019 08:50
To: Planning Policy
Subject: Local Plan Part 2
Attachments: FINAL_Representation_Form.doc

See attached

Sent from [REDACTED]



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)

National Federation of Gypsy Liaison Groups

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	Ms.	
First name	Siobhan	
Last name	Spencer	
Job title (where relevant)	Co-ordinator	
Organisation (where relevant)		
Address line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	[REDACTED]	
City / Town	[REDACTED]	
County		
Postcode	[REDACTED]	
Telephone number	[REDACTED]	
Email (if provided we will always contact you this way)	[REDACTED]	

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		No	x
If NO, is this because it is: (please tick all that you think apply)				
Not prepared in accordance with the Local Development Scheme				x
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 Local Plan does not make appropriate provision for Gypsies and Travellers as required by National Guidance and the Joint Core Strategy

3: Do you consider the Northampton Local Plan Part 2 to be sound?	Yes		No	x
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3 (1): If NO, is this because it is: (please tick all that you think apply)				
Not positively prepared				x
Not justified				x
Not effective				x
Not consistent with national policy				x

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
	140		

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.

The Local Plan does not make appropriate provision for Gypsies and Travellers as required by National Guidance and the Joint Core Strategy (JCS).

The West Northampton Accommodation Needs Study (GTAA), on which the position set out in para 140 is based, is flawed. The GTAA is based on a flawed assessment of those Travellers who meet the definition in PPTS 2015. The 10% figure used has been discredited and ORS Consultants have conceded that this figure is too low. So the need for sites is greater than suggested in the GTAA. Thus the Local Plan is based on a flawed assessment of need. The needs of the Travelling community will not be met.

Even where no need has been established, Planning Policy for Traveller Sites (PPTS) requires a local plan must set out policy criteria for dealing with applications. The policy in the JCS is inadequate in this regard as it is out of date.

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.

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		Yes, I wish to participate at the	x
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participate at the oral examination		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))

To represent the interests of Gypsies

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)	x
When the report of any person appointed to carry out an independent examination of Northampton Local Plan Part 2 is published	x
When the Northampton Local Plan Part 2 has been adopted	x
Other (please specify)	

10: Signature		Date	13/06/2019
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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