

[REDACTED]

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**From:** Brian Hoare [REDACTED]  
**Sent:** 14 June 2019 15:53  
**To:** Planning Policy  
**Cc:** Paul Everard  
**Subject:** PArt 2 Consultation  
**Attachments:** NBC submission form Part 2 Consultation Housing Projection site LAA 1140.pdf;  
NBC submission form Part 2 Consultation treatment of Playing fields Ladybridge  
Park.pdf

Good Afternoon

Please find attached tow submissions in respect of the consultation for the Part 2 Local plan

We have not been able to complete the Equality Monitoring Section because of formatting problems with the form down loaded from the NBC website.

If it would help your process we are happy to complete this section at a later stage but need to submit ahead of the 5pm deadline

Regards

*Brian Hoare*

On behalf of the West Hunsbury Residents Association



## **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:

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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.

☐

Y

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):

West Hunsbury Residents Association

*\*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	Brian	
Last name	Hoare	
Job title (where relevant)	Member	
Organisation (where relevant)	West Hunsbury Residents Association	
Address line 1		
Line 2		
Line 3		
City / Town		
County		
Postcode		
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.

<b>2: Do you consider the Northampton Local Plan Part 2 to be legally compliant?</b>	Yes		No	
If <b>NO</b> , 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.**

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

<b>4: To which part of the Local Plan does this representation relate?</b>	<b>Paragraph number</b>	<b>Policy number</b>	<b>Policies Maps</b>
<b>SITES ALLOCATION METHODOLOGY AND LAND AVAILABILITY ASSESSMENT (SAMLAA) April 2019</b>	Page 139	LAA1140	

**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.**

NBC have set out in para 5.22 the assumed density levels of development in the town centre and for the Rest of the Borough.

**Stage 6: Development Potential**

5.21 Stages 1 to 5 established which sites performed best and could be taken forward for allocation in the Local Plan (Part 2). Following this, an assessment of capacity (for residential sites only) was undertaken to establish how much development a site could bring forward.

5.22 The capacity was calculated using the following density figures:

Town centre	150 dwellings per hectare
Rest of the Borough	40 dwellings per hectare

Residents accept that benchmarks have been set but this does not make for sound planning for every site across the great swathe of the Borough outside the town centre.

At the planning application stage consideration will be given to adjacent sites and maintaining a street scene and 40 dwellings per hectare is not in keeping with the landscape that was established nearly 40 years ago.

The adjacent street of Heronsford and Teal close on a parcel of land circa 6 ha has a built density of 6.6 properties.

The build density submitted by the developer rather than using the NBC formula for site LAA 1025, a bigger site than LAA 1140 only proposes 180 properties which equates to a density of 25 units per ha.

Residents recognise that a standard has been set but believe that the application of 40 dwellings per hectare does not present a SOUND assessment of the capacity of Site 1140 and potentially inflates the 5 year land bank and deliverability of properties for future needs.

The SAMLAA assessment does not acknowledge the clear restrictions on this site which would prevent development across the grow area of 6.99 ha yielding 224 properties.

Along the back hedge of Heronsford and Teal Close cement slurry pipe runs with we believe a legal restriction preventing development above the pipeline.

Also the Northern part of the site, close to the Wootton Brook that flows towards the Blisworth by pass, is identified by Anglia Water as being in the

flood plain.



The calculated number of properties of 224 assumes that all the 6.99 ha is available for development which is clearly a false assumption leading to an overestimation of the sites potential to add to Borough land bank.

The conclusion to LAA 1140 SAMLAA assessment states

**RECOMMENDED FOR ALLOCATION**

**Subject to flood mitigation and suitable access arrangements being secured.**

Flood mitigation could further restrict the capacity of the site to deliver units eligible for the 5 year land bank.

The recommendation also acknowledges the lack of an identified access to what is effectively a land locked site.

Given the Councils responsibility to only take account of “deliverable sites “ to meet its obligation to satisfy the inspector of the robustness of the housing estimates residents believe that it is unsound to include this 224 properties in the 5 year land bank estimate.

In conclusion this site is land locked, no account has been taken of the restrictions that would prevent 6.99 ha from being developed and applying a standard density of 40 dwellings per ha which is out of line with the established housing stock makes 224 properties an unrealistic and unsound inclusion in the local plan.

**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?**

<b>No,</b> I do not wish to participate at the oral examination		<b>Yes,</b> I wish to participate at the oral examination	<b>Yes</b>
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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))**

The WHRA have taken an interest in local planning in this area for 20 years and have appeared at two public inquiries as Section 6.6. witnesses.

The residents believe that their local knowledge would help the Inspector to reach the right conclusion regarding the true capacity of site LAA 1140 and whether it is sound to include it in the housing / 5 year land bank estimates.



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

<b>10: Signature</b>	<b>Brian Hoare</b>	<b>Date</b>	<b>14/06/2019</b>
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**Thank you for taking the time to complete the form.  
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**Email:** [REDACTED]

By **post** or by **hand** to:  
Northampton Borough Council  
Planning Policy, The Guildhall, St Giles Square, Northampton, NN1 1DE





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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First name	Brian	
Last name	Hoare	
Job title (where relevant)	Member	
Organisation (where relevant)	West Hunsbury Residents Association	
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**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 Part 3 & Part 4 evidence in relation to the PLANNING THE FUTURE OF OPEN SPACE, SPORT AND RECREATION IN WEST NORTHAMPTONSHIRE have been posted on the NBC website but have not been exposed to public scrutiny in the same way as other aspects of the plan.

Therefore resident's local knowledge and identification of errors or inconsistencies has not aided the finalisation of the plan.

The material on the NBC website i.e. reports on Part 3 & Part 4 of the evidence does not contain all the supporting assessments to enable residents to understand or challenge the final recommendations which have been transferred into the consultation document without challenge.

We are sure that 99% of the evidence is right but that should not result in 100% being adopted without challenge.

Residents have identified formatting and language errors that support the need to allow the background evidence to be challenged.

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			Part 2 Policies Map

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Ladybridge Park West Hunsbury was designated in its entirety as Green Space in the 1997 Local plan.

Residents have not seen any evidence to justify departing from the previous treatment of the whole of Ladybridge Park as a single community open space.

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The Residents Group have tried to resolve this concern directly with the planning department before making this submission.

This has not reached a satisfactory outcome and the Planning department have not been able to provide a satisfactory explanation as to why the Football pitches in Ladybridge Park have been excluded from the rest of the park area.

Residents are not assured that "it does not matter they will still be safe"

Residents believe that an error has occurred transferring the information from the evidence base Part 3 & 4 of PLANNING THE FUTURE OF OPEN SPACE, SPORT AND RECREATION IN WEST NORTHAMPTONSHIRE

The treatment of football pitches Ladybridge Park, excluded from the designation of open spaces is not consistent with the way other football pitches have been treated in for example Abington Park, The Racecourse, Spring Park etc.

Residents believe that the same area in Ladybridge Park designated in the 1997 plan should be designated as a whole in this plan.

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