

[REDACTED]

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**From:** Stephen Marks [REDACTED]  
**Sent:** 21 June 2019 08:45  
**To:** Amanda Jacobs  
**Cc:** Noreen Banks; Planning Policy  
**Subject:** RE: Draft Northampton Local Plan Part 2 response  
**Attachments:** V2Representation\_Form NBC LPP2 PH consultation response Jun19.docx

Certainly, please see attached.

Regards,

Stephen

Stephen Marks  
Health & Planning Programme Manager  
**North Northamptonshire**  
**Joint Planning & Delivery Unit**  
c/o East Northamptonshire Council  
T: [REDACTED]

[REDACTED]  
[www.nnjpdu.org.uk](http://www.nnjpdu.org.uk)

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**From:** Amanda Jacobs [REDACTED]  
**Sent:** 20 June 2019 16:02  
**To:** Stephen Marks [REDACTED]  
**Cc:** Noreen Banks [REDACTED]; Planning Policy [REDACTED]  
**Subject:** RE: Draft Northampton Local Plan Part 2 response

Hi Stephen,

No problem.  
Please could you resend the form with para 210 so we have that on record from you?

Thanks,  
Amanda

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**From:** Stephen Marks [REDACTED]  
**Sent:** 20 June 2019 15:49  
**To:** Amanda Jacobs [REDACTED]  
**Cc:** Noreen Banks [REDACTED] Paul Everard [REDACTED]  
**Subject:** RE: Draft Northampton Local Plan Part 2 response

Hello Amanda,  
My apologies – it must have been a typo.

I was referring to paragraph 210 (rather than 120):

*210. Developer contributions for health care and well-being facilities and related provision will be sought and expected from developers and will be achieved through the use of Section 106 Agreements and CIL payments for the provision of improvements, extensions and creation of new health care facilities to meet the needs of a development.*

Apologies for any confusion.

Regards,

Stephen

Stephen Marks  
Health & Planning Programme Manager  
**North Northamptonshire**  
**Joint Planning & Delivery Unit**  
c/o East Northamptonshire Council  
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**From:** Amanda Jacobs [REDACTED]  
**Sent:** 20 June 2019 15:41  
**To:** Stephen Marks [REDACTED]  
**Cc:** Noreen Banks [REDACTED]  
**Subject:** Draft Northampton Local Plan Part 2 response

Dear Stephen,

Thank you for your comments on the draft Northampton Local Plan Part 2.

The policy team is in the process of recording comments and I have the following query related to yours.

You provide the following text under question 4(1):

**Healthcare infrastructure**

*We welcome the recognition (para 120) of the need to identify and secure health care facilities / provision in relation to new development. The model of health service delivery in the county is evolving. Health sector partners are working together with local government as part of the Northamptonshire Health & Care Partnership to develop new service models of health, community and social care services. Health sector partners will need to work closely with NBC to ensure effective provision is delivered in local communities and to meet the needs of new developments.*

However, paragraph 120 of the draft LPP2 does not relate to health infrastructure, but to housing:

*120. The following needs to be considered:*

- Much of the identified under-delivery so far has been the result of slower rates of housing completions in the Sustainable Urban Extensions than anticipated*
- The short term housing supply is constrained by the JCS's heavy reliance on large SUEs for substantially meeting the Borough's housing needs*
- The Council has researched alternative sites in the borough exhaustively through its Call for Sites and Land Availability Assessments. There are no other sources of supply that could address this short term shortfall*

I have assumed, therefore, that the incorrect paragraph has been referenced. As such, please can you clarify which paragraph you are making reference to?

Thanks,  
Amanda

**Amanda Jacobs – MRTPI | Senior Planning Officer**



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

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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](http://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):

Northamptonshire County Council Public Health Team

*\*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	Stephen	
Last name	Marks	
Job title (where relevant)	Health & Planning Programme Manager	
Organisation (where relevant)	Northamptonshire County Council Public Health / North Northants Joint Planning Unit	
Address line 1	c/o North Northants Joint Planning & Delivery Unit	
Line 2	East Northants Council	
Line 3	Cedar Drive	
City / Town	Thrapston	
County	Northamptonshire	

Postcode	NN14 4LZ	
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	✓
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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	
Not justified	
Not effective	✓
Not consistent with national policy	

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
Various health and wellbeing references.			

**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 following comments are made in relation to the health and wellbeing elements of the content of the Northampton Local Plan Part 2 Submission Draft.

They are made in the context of the following:

**National Planning Policy Framework:**

*8. Promoting healthy and safe communities*

*91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

*c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.*

*92. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

*b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*

and

**Planning Guidance relating to Health and Wellbeing:**

<https://www.gov.uk/guidance/health-and-wellbeing>

Northampton Borough faces significant challenges in relation to health and wellbeing. For example

-Life expectancy was significantly worse than the England average. (2015-17)

-68.1% of its population were classified as overweight or obese, which has significant health and wellbeing implication. (in 2017/18)

-22.7% of children in school reception year were classified as overweight, rising to 33.7% for school year 6. (<https://fingertips.phe.org.uk/profile/public-health-outcomes-framework>)

Poor health has implications for:

Individual and community wellbeing.

Demand for health and care services.

Productivity and the local economy.



## **Northamptonshire Health & Wellbeing Strategy**

<https://www3.northamptonshire.gov.uk/councilservices/health/health-and-wellbeing-board/Pages/health-and-wellbeing-strategy.aspx>

The LPP2 seems to make no reference to the Northamptonshire Health & Wellbeing Strategy and the objectives identified within this key partnership strategy. The health and wellbeing strategy explicitly recognises the role of places in supporting healthier lifestyles and the need to do so given the health and wellbeing challenges faced in the county including Northampton Borough. This should be addressed in accordance with para 92b of the NPPF.

### **Paragraph 60**

Paragraph 60 of the Northampton Borough Draft Local Plan Part 2 states that:

*The above table demonstrates that there is a need to ensure that the Borough is better equipped to deal with meeting people's health requirements, particularly in light of its growing population. Within Northampton, there are a range of public and private health facilities including Northampton General Hospital, GP surgeries, dentists, pharmacists and other health care providers.*

This seemingly focusses on healthcare provision for those who are ill. While this is critical, we feel there should also be a recognition of the need to support healthier lifestyles within the communities of Northampton Borough and thus prevent ill health.

### **Neighbourhood centres**

We welcome the recognition that *'the Local Plan also has an important role to play in achieving a much healthier lifestyle and an inclusive community'*(para 159)

The LPP2 states that neighbourhood centres *perform a variety of roles including promoting of social interaction and supporting a healthier lifestyle.*

While the provision of access to local services is an important contributor to wellbeing, the LPP2 makes no recognition of the potential negative wellbeing impacts of neighbourhood centres which may contribute to poor health and wellbeing through the proliferation of access to food and other services that are less likely to lead to a healthier lifestyle (alcohol / unhealthy food).

Public health approaches acknowledge that overweight / obesity is a complex issue that must be tackled in a variety of ways. However, one key factor is the food and drink environment.

Public Health England states:

*'This is primarily because we are living in an obesogenic environment where less than healthier choices are the default, which encourage excess weight gain and obesity.*

*The Foresight report states that while achieving and maintaining calorie balance is a consequence of individual decisions about diet and activity, our environment, and particularly the availability of calorie-rich food, now makes it much harder for individuals to maintain healthier lifestyles.*

*The increasing consumption of out-of-home meals – that are often cheap and readily available at all times of the day - has been identified as an important factor contributing to rising levels of obesity.'*

The reality is that many neighbourhood centres can contribute to poor health and wellbeing, through a concentration of provision of less healthy options and limited healthy options. It is disappointing that there is no recognition of this or any policy approach to seek to address it.

### **Healthcare infrastructure**

We welcome the recognition (para 210) of the need to identify and secure health care facilities / provision in relation to new development. The model of health service delivery in the county is evolving. Health sector partners are working together with local government as part of the Northamptonshire Health & Care Partnership to develop new service models of health, community and social care services. Health sector partners will need to work closely with NBC to ensure effective provision is delivered in local communities and to meet the needs of new developments.

### **Summary**

While the various references to health and wellbeing within the Local Plan Part 2 are welcomed, we feel that a specific Health and Wellbeing Policy would be more effective.

A specific health and wellbeing policy would bring some of these together and provide focus and emphasis on the importance of addressing wellbeing. A requirement for Health Impact Assessment for major developments (at a level / scale appropriate to the development proposals) would also provide a systematic way for ensuring that health and wellbeing implications of development proposals are considered and that opportunities for new development to contribute to community health and wellbeing are maximised.

This is an approach that has been taken by both of the other local planning authorities within West Northamptonshire in their Local Plans.

The text of South Northamptonshire Council's proposed Health and Wellbeing policy is attached for information.

**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	✓
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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 Public Health function is able to provide information about health and wellbeing challenges in Northampton Borough and efforts to work through the planning system to support the health and wellbeing of the Borough's communities and thus contribute to sustainable development.

**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)	

<b>10: Signature</b>	<b><i>Stephen Marks</i></b>	<b>Date</b>	<b>12June19</b>
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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

