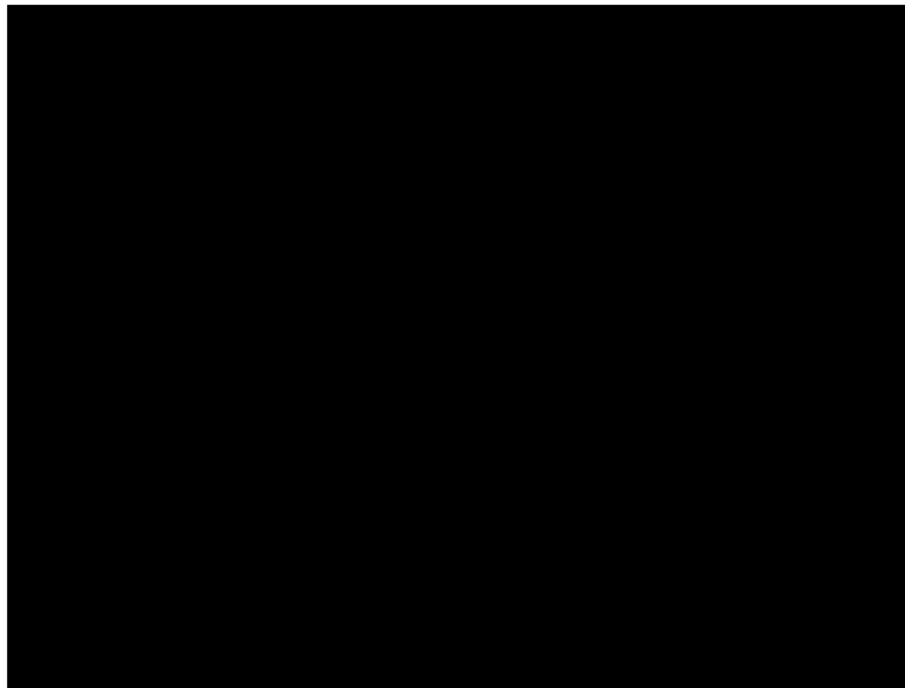


Mike Burgess

From: Brian Hoare [REDACTED]
Sent: 14 June 2019 16:39
To: Planning Policy
Cc: Paul Everard
Subject: WHRA submission no 3
Attachments: NBC submission form Part 2 Consultation Ladybridge Park designated as Amenity Space.pdf

Please find our submission in respect of Ladybridge Park being categorised as Amenity Space.

Again we have been unable to complete the Diversity Section



Brian Hoare

Tel [REDACTED]
Mobile [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.

☐

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.

2: Do you consider the Northampton Local Plan Part 2 to be legally compliant?	Yes		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.

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	

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
Designation of Ladybridge Park as Amenity Space Part 4 evidence Open Spaces	Page 48		Figure 24

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 Nortoft open spaces evidence in their Part 4 report details the range of open spaces including the categories of Parks & Gardens and Amenity Space

In Figure 5 page definitions are provided for these two important categorises of open space

Figure 5: Open Space Typologies for Northampton

Parks and Gardens (P&G)	Urban parks, country parks and formal gardens, open to the general public providing opportunities for informal recreation and community events.
Amenity Green Space (AGS)	Informal recreation and green spaces in and around housing, with a primary purpose of providing opportunities for informal activities close to home or work.
Natural / Semi	Woodlands, scrubland, orchards, grasslands (e.g. meadows

Whilst there may be technical process of assessing individual parcels of land, the Local plan is a policy document that should paint a recognisable picture to local residents of the distinctly different open spaces typologies.

Amenity space would appear to be small parcels of land close to or between housing that add the feel of open space to a development.

This has a very different feel to the definition of Parks and gardens open to the public which could be used for community events.

In West Hunsbury two large parcels of land have been allocated to different categories Hunsbury Hill Park (Parks & Gardens) and Ladybridge Park (Amenity Space).

Residents would expect the two open spaces in West Hunsbury that fulfil similar Functions to be categorised the same as Parks and Gardens.

The Part 4 report is not clear why individual parcels of open space have been assessed as either a Park or Amenity Land. The format of detailing the land in each category is different and therefore the residents in West Hunsbury cannot see or understand why the parcels of land are viewed differently in this planning process.

A wider inspection of the planning document reveals that similar differences appear in other parts of Northampton e.g. Dallington Park is categorised an Amenity Space.

Residents accept that size is not a prime determining factor but it seems strange that existing Borough owned and maintained parks some as close to 20ha have been categorised as Amenity spaces.

The Nortoft reports are evidence received by the council and posted on their website; they have not been exposed to public scrutiny.

The reports do not identify why each parcel of land has been placed in a particular category and importantly why large parcels of land which could not reasonably be described as “in and around housing” have been designated as Amenity land.

There does not appear to have been any Sensitivity / score thumb testing of the evidence used by the Council.

The planning departments response has been that it does not affect the level of protection from a planning point of view, which leads to the question “why did you therefore spend money producing the evidence”

However the consultant’s report gives a clue as to how it could make a difference

- | | |
|---------|--|
| Part 1: | Profile, Policy Context and Engagement |
| Part 2: | Sports facilities |
| Part 3: | Playing pitch strategy |
| Part 4: | Open spaces |

The study will help Northampton Borough Council:

- Understand provision needs for now and in the future
- Inform the determination of planning applications
- Guide the management and maintenance of open space
- Prioritise local authority capital and revenue investment, including s106 and any future Community Infrastructure Levy (CIL)
- Inform and underpin bids to external funding partners to assist in the delivery of open space in the context of green infrastructure
- Investigate a potential rationalisation by having regard to surplus capacity, areas of demand, site quality and understanding the potential for alternative uses
- Contribute to the aims and objectives of improving health and well-being by providing spaces and places people want to recreate and relax in

The consultant’s evidence does not justify their conclusions and residents want a categorisation that makes sense and is line with the experience of the local area.

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	Yes

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))
<p>The West Hunsbury Residents association would want to represent the resident's views and the work of the Friends of West Hunsbury Parks who do not appear to have been recognised in the consultant's assessment.</p>

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	Brian Hoare	Date	14/06/2019
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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