

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 14 June 2019 14:26  
**To:** Planning Policy  
**Subject:** NLP2 SUBMISSION DRAFT  
**Attachments:** Local\_Plan\_submission\_\_FINAL\_Representation\_Form.pdf

Good Afternoon,

Please find attached a response to the Local Plan Consultation, on behalf of the Northampton Green Party.

Please would you be able to confirm receipt of this email.

Kind Regards

Steve Miller  
Northampton Green Party



## **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):

Political Party

*\*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	Miller	
Job title (where relevant)		
Organisation (where relevant)	Northampton Green Party	
Address line 1	43 Lynton Avenue	
Line 2	Kingsthorpe	
Line 3		
City / Town	Northampton	
County	Northamptonshire	
Postcode	NN2 8LX	
Telephone number	<span style="background-color: black; color: black;">XXXXXXXXXX</span>	

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	X	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	X
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<b>3 (1): If NO, is this because it is: (please tick all that you think apply)</b>	
Not positively prepared	
Not justified	
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
Sustainable Design & Construction	87	5	

**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.**

**Energy Efficiency for New Builds**

In addition to this objective, in June 2019, Northampton Borough Council passed a motion declaring a Climate Emergency for Northampton and committing to making Northampton Carbon Neutral by 2030. This motion needs to be reflected in Local Planning Policy and the Local Plan should reflect this. Therefore, Objective 12 should also contain the statement that “All new builds should confirm to the Passivhaus Zero Carbon Standard”

Paragraph 87 of the local plan reports that there is a requirement for greater energy efficiency in the construction phase of new builds, but it makes no reference to the ongoing energy efficiency of those buildings. This will form a key part of moving Northampton towards a Zero Carbon future, and it is important that this requirement is reflected in the local plan. A new paragraph 88 should be inserted stating that the Council encourages the use of energy savings standards such as Passivhaus in all new builds, and will be issuing Planning Guidance to support this requirement, as allowed by National Government in July 2018.

It is our contention that the above changes represent a justified change to the Local Plan which otherwise will not enable Northampton Borough Council to meet its obligations towards Zero Carbon by 2030. These requirements also form part of National Government’s targets as set out in the Climate Change Act (2008), and included in Part L of Building Regulations.

**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.

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
<b>Sustainable Design &amp; Construction</b>	90	5	

**4 (2): 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.**

**Community Energy**

Although there is a reference to Combined Heat and Power (Paragraph 90) there is no mention of Community Energy in the Local Plan. Community Energy schemes allow communities or neighbourhoods to work together to support a local energy generation scheme that can provide power at a reduced cost to residents within that community. Successful implementations of this include Harborough Energy (to the North of Northampton) and Wolverton Community Energy (to the South of Northampton)

The Local Plan should support the development of Community Energy Schemes across Northampton, with a presumption towards either solar PV or wind turbines. This should not be limited to Sustainable Urban Extensions but should be genuinely supported by the Local Plan as an option for communities to reduce their dependence on fossil fuel and to help Northampton move towards it's Zero Carbon target.

Community Energy Schemes are supported by National Government as part of the Climate Change Act (2008). It is our contention that the inclusion of Community Energy is justified in the Local Plan as part of that National Policy and because it will help Northampton Borough Council deliver on Objective 12 (Encouraging renewable energy production in appropriate locations)

<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>Built &amp; Natural Environment (Green Infrastructure)</b>	175	23	

**4 (3): 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.**

### **Trees**

The Draft Local Plan makes no reference to the protection of trees. Trees, whether appearing as individuals, groups or as woodlands, have a very significant effect on our quality of life by providing direct and indirect benefits, and the local plan should reflect this as part of the Green Infrastructure objective.

This should include the following policy :

- The Council will not grant planning permission for developments which directly or indirectly threaten trees or woodlands of significant amenity.
- Proposals should normally retain any valuable or important trees where they make a contribution to public amenity, the distinctiveness of a specific location or contribute to the environment, including the Wildlife Habitat Network and green infrastructure networks.
- Proposals will need to comply with relevant national standards regarding the protection of trees in relation to design, demolition and construction. Where tree loss is deemed to be acceptable, developers will be required to submit a detailed mitigation scheme.

This policy should be delivered in line with British Standard BS 5837 Trees in relation to design, demolition and construction. This standard outlines how to successfully take account of and retain suitable trees in proximity to development. These will assist the Council in delivery of Objective 10. It is our belief that this should be added to the policy for it to be considered effective.

## **SUSTAINABILITY APPRAISAL**

**5. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number).**

<b>Paragraph</b>	
<b>Comments</b>	



## **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	X
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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))**

Northampton Borough Council has accepted that it has to meet Zero Carbon obligations by 2030. This target has to be reflected in the Local Plan, and the Policies within the Local Plan have to be policies that give Northampton an effective chance of meeting those targets.

The three changes that we have outlined are all positive steps that ensure the plan is effective and will help Northampton to meet its obligations. I would be happy to represent these changes at the oral examination.

**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
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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)	

<b>10: Signature</b>		<b>Date</b>	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

