

[REDACTED]

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**From:** Katie Hancock [REDACTED]  
**Sent:** 13 June 2019 17:20  
**To:** Planning Policy  
**Cc:** [REDACTED]  
**Subject:** Local Plan Part 2 consultation submission  
**Attachments:** EMS.2858.LPP2SubmissionReps.130619.FINAL.pdf

Hello,

Please can I submit the following representation to the Northampton Local Plan Part 2 Proposed Submission Draft consultation.

Please can you confirm receipt of this submission.

Kind regards,

Katie

**Katie Hancock**  
Planner

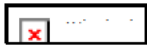
**Pegasus Group**

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DD [REDACTED] | EXT [REDACTED]

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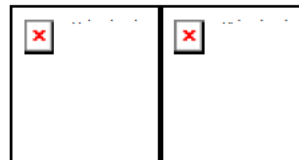


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## **REPRESENTATION FORM FOR THE NORTHAMPTON LOCAL PLAN PART 2 PROPOSED SUBMISSION DRAFT (REGULATION 19 CONSULTATION)**

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):

*\*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		Gary
Last name		Lees
Job title (where relevant)		Executive Director
Organisation (where relevant)	L & Q Estates	Pegasus Group
Address line 1		4 The Courtyard
Line 2		Church Street
Line 3		Lockington
City / Town		Derby
County		Derbyshire
Postcode		DE74 2SL
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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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				<input type="checkbox"/>
Not prepared in accordance with the Statement of Community Involvement				<input type="checkbox"/>
Not consistent with the regulatory requirements for consultation				<input type="checkbox"/>
Not compliant with the duty to cooperate				<input type="checkbox"/>
Not accompanied by a compliant Sustainability Appraisal				<input type="checkbox"/>

**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	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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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	<input checked="" type="checkbox"/>
Not justified	<input checked="" type="checkbox"/>
Not effective	<input checked="" type="checkbox"/>
Not consistent with national policy	<input checked="" type="checkbox"/>

<b>4: To which part of the Local Plan does this representation relate?</b>	Paragraph number	Policy number	Policies Maps
		12	

**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.**

Paragraph 14 of the NPPF states that at the heart of the NPPF is a presumption in favour of sustainable development. For plan-making this means that local planning authorities should positively seek opportunities to meet the development needs of their area; and that the Local Plan should meet the objectively assessed housing need, with sufficient flexibility to adapt to rapid change. This is furthered at paragraph 157 which states that crucially, Local Plans should positively plan for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF.

Policy 12 sets out the sites allocated for housing and/or housing led development, including which sites will contribute to the Borough's 5 year housing supply. The evidence base for the housing policies set out within the Borough's Part 2 Plan does not evidence the availability, suitability, and achievability of the sites listed in policy 12. Therefore, as per paragraph 47, footnote 11, the sites cannot be considered deliverable, and should not be included in the Boroughs five year housing supply. Therefore, policy 12 does not accord with policy 47 of the NPPF, which requires local planning authorities to provide a five year housing supply against their housing requirement.

Subsequently, paragraph 49 dictates that relevant policies to the supply of housing cannot be considered up to date as the Borough cannot demonstrate a five year supply of deliverable housing sites. Therefore, the Borough cannot meet the development needs of their area, in direct contrast with paragraph 14 and the presumption in favour of sustainable development.

It is considered that Policy 12 is not positively prepared as it does not meet the development needs of the Plan, it is not justified as it is not based on proportionate evidence, and it is not consistent with national policy as it does not enable the delivery of sustainable development.

In order for the policy to be positively prepared, justified and consistent with national policy, the Borough should look to allocate further sites that can provide considerable evidence to demonstrate their availability, suitability, and achievability to confirm that they can deliver.

**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	

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## **HABITATS REGULATIONS ASSESSMENT**

<b>6. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number).</b>	
Paragraph	
Comments	

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

<b>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))</b>

<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)	✓
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)	
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10: Signature		Date	13/06/19
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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  
**Equality Monitoring Form**

To ensure that the council's equality policy is operating effectively, we would be grateful if you could complete this monitoring form. However, you are not obliged to answer any of these questions.

Any personal information will be treated in the strictest of confidence. It is for monitoring purposes only and will not be shared with any other individual or organisation.

