From: Simon Barber

 Sent:
 21 May 2019 19:13

 To:
 Planning Policy

Subject: Re: NORTHAMPTON LOCAL PLAN PART 2 PROPOSED SUBMISSION

CONSULTATION

Attachments: FINAL_Representation_Form.doc

Dear Paul Everard,

I now attach the updated representation form with the personal details.

Yours faithfully, Simon Barber

On 21/05/2019 11:27, Planning Policy wrote:

Good morning Mr Barber

Thank you for sending your representation form. In order for us to accept it as duly made, could you complete the personal details section please?

These are required for the comments to be accepted under the regulations, but will be redacted and kept confidential for publication purposes.

Thank you very much

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

Customer Feedback

We would like your feedback to help us maintain and continually improve the standard of services we provide. As a customer of the Regeneration, Enterprise and Planning Directorate it would help us if you could take a moment to complete the online <u>survey</u> about your experience.

Any personal information you do provide to us will be held on a computer database. Your personal information will only be used by, and on behalf of, Northampton Borough Council in improving the service we provide to our customers.

Northampton Borough Council has adopted a Community Infrastructure Levy (CIL) Charging Schedule. All planning applications for liable developments submitted and granted permission after 1st April 2016 will have to pay the levy. The charge only applies to residential development and to retail developments of more than 100 square metres outside the town centre. You can find out more about Northampton's CIL, including full details of which developments are liable and which are exempt by clicking here: http://www.northampton.gov.uk/cil

From: Simon Barber Sent: 19 May 2019 22:08

To: Planning Policy

Subject: Re: NORTHAMPTON LOCAL PLAN PART 2 PROPOSED SUBMISSION CONSULTATION

Dear Paul Everard,

I now attach a copy of the draft submission for the Northampton Local Plan(Part 2) with my representations.

Yours faithfully,

Simon Barber

On 29/04/2019 17:14, Planning Policy wrote:

Dear Sir/Madam

In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council is consulting on the Proposed Submission of the Northampton Local Plan Part 2, Sustainability Appraisal and Habitats Regulations Assessment.

The Draft Plan was approved for consultation by the Council's Cabinet on 3 April 2019. A Statement of Fact and a Statement of Representation Procedure can be downloaded through the following links:

https://www.northampton.gov.uk/downloads/file/10945/05-statement-of-fact-nbc-2019

https://www.northampton.gov.uk/downloads/file/10947/06-statement-of-representations-procedure-notice-nbc-2019

If you have any representations to make, please do so, preferably using the online survey, by 5pm on 14 June 2019. Consultation begins on the 1 May 2019, and further information can be found by accessing the following link: www.northampton.gov.uk/lp2proposedsubmission.

The online representation form and evidence base documents will be available from 1 May.

Yours faithfully

Paul Everard
Planning Policy and Heritage Manager



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/

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 Cou	ncil collecting my per	rsonal data so	that they can	process my	reply to the
Northampton Loca	al Plan Part 2 Propos	ed Submission	Draft Regula	ation 19.	

/ Ye	es (please tick)
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Please co Response	9. Ref:	
This form	has 2 parts:	(For official use onl
Part A	Personal details	(* 3. 3
Part B	Your representation(s). Please fill in a separate sheet for each representation	entation you wish to
Part A: Pe	ersonal Details	
Q1: Are ya appropria	ou making this representation as? (Please tick as te)	
a) Res	sident or member of the general public	
b) Loc	al Authority or Town/Parish Council	
c) Lan	ndowner	
d) Age	ent / Consultant (on behalf of)	
e) Oth	er organisation (please specify which type of organis	ation below):
I am a m	ember of the English Regional Transport Association	
*If on a	egent is ennointed please complete only the Title No	ma and Organization

*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	Simon	
Last name	Barber	
Job title (where relevant)	Administrator	
Organisation (where	English Regional	
relevant)	Transport Association	
Address line 1	20 Fitzherbert House	
Line 2	KIngsmead	
Line 3		
City / Town	Richmond	
County	Surrey	
Postcode	TW10 6HT	
Telephone number		

Email (if provided we will	
always contact you this way)	

Part B: Representation(s)

vou

2:

Please use a separate sheet for each representation

consider

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.

No

the Yes

Northampton Local Plan Part 2					
to be legally compliant?					
If NO, is this because it is: (please tick all that you think apply)					
Not prepared in accordance with the Lo					
Not prepared in accordance with Involvement	the State	ment of	Community		
Not consistent with the regulatory requ		consultation	on		
Not compliant with the duty to cooperate					
Not accompanied by a compliant Susta	ainability Ap	praisal			
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. I am unsure					
3: Do you consider the Yes Northampton Local Plan Part 2 to be sound?					
3 (1): If NO, is this because it is: (pleas	se tick all tha	at you think	apply)		
Not positively prepared			/		
Not justified			/		
Not effective			/		
Not consistent with national policy			/		

4: To which part of the Local Plan does this representation relate?	•	Policy number	Policies Maps
a)Key Challenges & Opportunities for Northampton	71/72 page 27		
b)Housing	126 page 52	12(Ref.0288/0333)	
c)_Site Specific Allocations and Policies	218-222 page 94 223-224 pages 97-99	34 35(Ref.1005)	Figure 17
d)Appendix C:Schedule of Planning Obligation Requirements for Transport Schemes	Pages 127- 128		

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.

a)Key Challenges & Opportunities for Northampton

The Strategic Rail Opportunities should involve the protection of old railway trackbeds, particularly the Northampton-Bedford railway which the English Regional Transport Association(ERTA)welcomes support for reopening and consideration to fund a study in conjunction with other parties. Reopening that rail link will bring substantial benefits for both passengers and freight. In fact ERTA raised funds for commissioning a £1500 Pre-feasibility Study (Engineering Study) by the Scott Handley Partnership back in 2001 and a £1500 Merits Case Prefeasibility Outline looking at the case. This was generously supported by the Councils and the public at large at that time. The study provided a route option around interim development threats, largely accepted at a subsequent inquiry at Olney over Warrington Road and a new Road with offices. The benefits for Northampton will be as follows:

- Improved connections to Bedford and Olney
- Cream off excess traffic along M1/A45/A14/A428, particularly in peak-hours
- More parking spaces at Northampton Station
- Boost range/business cases for all routes associated with East-West Consortium
- More capacity for the West Coast Main Line

Furthermore, there must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); the old Bridge Street station should also be re-opened. The ERTA also wishes to see the Northampton – Peterborough line re-opened.

These matters should also be mentioned in Chapter 11(Movement) under paragraphs 200/201 page 86.

- b) Housing Since these housing developments are close to the main railway line, there should not be any housing development on those sites. Moreover these could obliterate old railway track-beds. In any case the housing will encourage more road traffic, and the town's roads are frequently congested. See also paragraphs 218-222 page 94
- c)Site Specific Allocations and Policies The Martins Yard Development should not go ahead since this is close to the main railway line, whether it is housing or office development. Moreover this could obliterate the old track-bed of the old Northampton Bedford railway(see later). In any case the housing and offices will encourage more road traffic, and the town's roads are frequently congested.
- d)<u>Appendix C:Schedule of Planning Obligation Requirements for Transport Schemes</u>

Northampton Northern Relief Road - This will shift traffic rather than removing it and the new road space will soon fill up with traffic. Furthermore it will also obliterate the track-bed of the old Northampton-Market Harborough railway line which ERTA also wishes to see re-opened.

St.James Inner Relief Road - This is a short-term project (apparently currently put on hold due to funds) and again, this will shift traffic rather than removing it and at best, given there is a considerable amount of commercial and domestic development in Northampton Borough, the new road space will soon fill up with traffic. It will also obliterate the old track-bed of the old Northampton - Bedford railway. There must be provision for a potential level crossing where the road crosses the old track-bed.

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 REC	GULATIONS A	SSESSM	<u>ENT</u>	
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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	
When the Northampton Local Plan Part 2 has been adopted	/
Other (please specify)	

10: Signature		Date	19 May 2019
	V		
	^		
	Simon Barber		

Thank you for taking the time to complete the form.

Please return it to:

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