

[REDACTED]

From: [REDACTED]
Sent: 13 June 2019 09:37
To: Planning Policy
Cc: Thomas Bowler
Subject: NLP2 Submission Draft

[REDACTED] has shared a OneDrive file with you. To view it, click the link below.

[REDACTED]

Dear Sir/Madam

Please find attached formal submission on behalf of Great Houghton Parish Council.

As I am away from office should you have any queries relating to this submission please contact our chairman Cllr Thomas Bowler on the above email address

Kind regards

Mike

Mike Billingham CILCA
Parish Clerk
Great Houghton Parish Council
[REDACTED]

Tel: [REDACTED]
Email: [REDACTED]

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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

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):

Great Houghton Parish Council

**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	Mike	
Last name	Billingham	
Job title (where relevant)	Parish Clerk	
Organisation (where relevant)		
Address line 1		
Line 2		
Line 3		
City / Town		
County		
Postcode		
Telephone number		

Email (if provided we will always contact you this way)		
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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	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				X
Not consistent with the regulatory requirements for consultation				X
Not compliant with the duty to cooperate				X
Not accompanied by a compliant Sustainability Appraisal				X

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.

NBC have failed to properly cooperate with all relevant parties including the Parish Council in relation to policy 36 – The Green Gt Houghton (LAA1098) in Considering and identifying suitable measures to mitigate the considerable impact of additional traffic generated by the development as highlighted to them by Highways England in the sustainability appraisal as a substantial reason against such development. In particular NBC has failed to cooperate in accordance with section 33A (2) (a) & (b) of the PCP Act 2004

The proposed Policy 36 is not compliant with the Sustainability appraisal carried out by NBC which identified that the current road structure is not sufficient to deal with increased traffic generated by such a sizable development that will greatly prejudice social, environmental and economic factors and therefore not sustainable.

The size of the development will more than treble the current households in Great Houghton from 300 to 1100. There is no School, no shops, and no public transport system. NBC have failed to engage constructively and actively in any process or to cooperate in providing a sustainability assessment of the adverse impact that such lack of facilities will have on residents within the development and has failed to cooperate with the Parish Council and other agencies in identifying how such impact will be mitigated.

The process adopted by NBC for the second stage consultation with the wider public has been both restrictive in its circulation and complicated in its

completion to the extent than numerous residents, without planning experience and knowledge, have been unable to understand or comprehend the format and questions. The advice and guidance supporting the process does not provide a full and comprehensive explanation enabling the lay-person to properly complete the process. The consultation distribution process has created access problems and delays resulting in insufficient time for many to consider and determine their representations. NBC Planning office have interfered with the democratic process by intercepting and rejecting representations from members of the public having unilaterally determined and advised that the representation was not compliant. This has adversely influenced numerous objectors from continuing with their representations.

3: Do you consider the Northampton Local Plan Part 2 to be sound?	Yes		No	No
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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	
Not consistent with national policy	

4: To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
The Green Gt Houghton		36	LAA1098

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.

- To cooperate with the Parish Council and other agencies on addressing impact of traffic movements within the reports that provide evidence of impact on Great Houghton in order for the plan to be positively prepared and justified.

- To cooperate with the provision of information regarding upgrade of existing infrastructure known as 'The Green' from the proposed link to Minor junction
- - To identify how Issue with single track road, extremely difficult for vehicles passing will be addressed in order to be justified and effective
- To identify how Issue with pedestrian safety, no footpaths currently, but the existing section of The Green within the development is being upgrade for foot / cycle movements. This should extend to the full extent of the green in order for the plan to be positively prepared, justified and effective
- -To provide assessment of Air quality impact within surrounding areas. The significant increase in anticipated vehicular movements will have a dramatic effect on the local residents, passing cyclists and general environment
- - To provide assessment of safety linked to potential additional traffic movement through Great Houghton and its impact on surrounding network of routes very popular with cyclists and walkers.
- To specify measures to '**mitigate the impact of additional traffic generated by the development**' as stated in Policy 36, that must be taken in order for the proposed submission to be considered sound.
- A formal 7.5 tonne weight limit must be introduced preventing HGV's from travelling through the village between the A428 Bedford Road and the B526 Newport Pagnell Road before Policy 36 could be considered as positively prepared or justified.
- The Bedford Road /High Street junction must be improved to ensure safety for both road users and pedestrians alike.

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	Policy 36
Comments	Not sustainable for following reasons:

	<ul style="list-style-type: none"> • Road network not suitable for such a sizeable development. • No footpaths or cycleways connect development with major road network • No public transport system • No school, shops or medical centres
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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	NO	Yes , 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))

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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)	

10: Signature		Date	11 June 2019
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**Thank you for taking the time to complete the form.
Please return it to:**

Email: [REDACTED]

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

