

[REDACTED]

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**From:** Nick Sandford [REDACTED]  
**Sent:** 14 June 2019 14:59  
**To:** Planning Policy  
**Subject:** Northampton Borough Council submission draft local plan  
**Attachments:** Northampton Borough Council submission draft local plan.docx

I have enclosed some brief comments on the Submission Draft of your local plan.

Best wishes

Nick Sandford  
Regional External Affairs Officer  
The Woodland Trust

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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**

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### 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):

Conservation charity

*\*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	Nick	
Last name	Sandford	
Job title (where relevant)	Regional External Affairs Officer	
Organisation (where relevant)	The Woodland Trust	
Address line 1	Kempton Way	
Line 2	Dysart Road	
Line 3		
City / Town	Grantham	
County	Lincs	

Postcode	NG31 6LL	
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	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 <b>NO</b>, is this because it is: (please tick all that you think apply)</b>	
Not positively prepared	
Not justified	
Not effective	
Not consistent with national policy	x

<b>4: To which part of the Local</b>	Paragraph	Policy	Policies
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Plan does this representation relate?	number	number	Maps
Policy 25 on Biodiversity			

**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 wording of Policy 25 states that development should aim to secure a net gain in biodiversity. We support this aim but it is important to also state that this should not involve any loss of irreplaceable habitats such as ancient woodland or ancient/veteran trees.

Unless this is stated, the policy is not consistent with Para 175c of the National Planning Policy Framework, which specifies that loss of ancient woodland or veteran trees should only be allowed in wholly exceptional circumstances. We would like to see this wording reflected in your Local Plan.

**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**



<b>10: Signature</b>	<b>Nick Sandford</b>	<b>Date</b>	<b>14 June 2019</b>
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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.

