

Mike Burgess

From: Guy Longley [REDACTED]
Sent: 14 June 2019 15:42
To: Planning Policy
Subject: EMS.2615 Northampton Part 2 Local Plan Consultation
Attachments: 07.5462.Northampton BC.Part 2 Plan.14.06.19.pdf; EMS.2615 Policy 13 Housing Mix.FINAL SIGNED.pdf; EMS.2615. Ch 7 Housing.FINAL SIGNED.pdf; EMS.2615.Ch14.Monitoring.FINAL SIGNED.pdf; EMS.2615.Ecton.Vision.FINAL SIGNED.pdf; EMS.2615.Policy 33.FINAL SIGNED.pdf

Please find attached representations in relation to the Part 2 Local Plan Consultation.

I would be grateful if you could acknowledge receipt of the submissions.

Guy

Guy Longley
Executive Director

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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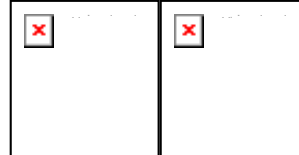
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GLO/07.glo.5462/EMS.2615

14 June 2019

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Northampton
NN1 1DE

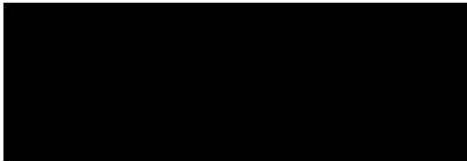
Dear Sir/Madam

Northampton Part 2 Local Plan – Proposed Submission Draft

Thank you for the opportunity to comment on the Submission Draft Version of the Part 2 Local Plan. Please find attached completed representation forms on behalf of Miller Homes in relation to their interests in land to the east of Northampton.

If you require any further information, please let me know.

Yours faithfully



GUY LONGLEY
Director

Enc: Completed representation forms



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.

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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)

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Part B Your representation(s).

Please fill in a separate sheet for each representation you wish to make

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- 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		Guy
Last name		Longley
Job title (where relevant)		Executive Director
Organisation (where relevant)	Miller Homes c/o Agent	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.

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2: Do you consider the Northampton Local Plan Part 2 to be legally compliant?	Yes		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				
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.

In the context of the shortfall in housing provision for Northampton, the Council has failed to properly investigate other options for addressing likely shortfalls through discussions with adjoining authorities, including Wellingborough District Council

3: Do you consider the Northampton Local Plan Part 2 to be sound?	Yes		No	✓
--	-----	--	----	---

3 (1): If NO, is this because it is: (please tick all that 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?	Paragraph number	Policy number	Policies Maps
		Policy 13	

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.

Policy 13 sets out requirements for housing mix on both market and affordable housing sites. The policy indicates that exceptions to this mix will be accepted only where they are evidenced by a robust assessment of needs.

The approach to securing a mix of housing on sites is overly prescriptive and fails to recognise that there can be a number of site-specific circumstances that would mean for a particular site, application of the prescribed mix would not be justified. For market housing, house builders are best placed to understand the market and will not build a mix of properties that are not in demand.

Whilst an overall district wide target may be appropriate, to slavishly apply this precise mix on all sites is not acceptable. It is noted that there is no indication of the size of site the policy will apply to.

The policy needs to be amended to make it clear that the percentages are a target and an alternative mix will be considered to reflect site specific circumstances. The percentages should also be expressed as ranges to provide further flexibility.

In terms of self-build and custom build housing, the policy advises that provision should be made for a proportion of serviced plots for self-build/custom build on sites of more than 100 dwellings. This policy is not supported. Paragraph 130 refers to the Self-Build register but does not present any evidence of the demand for self-build plots in Northampton Borough.

Larger sites are not suitable to accommodate self-build/custom build. Those with an interest in self-build are more likely to want a single plot and not secure a plot on a larger development. There are also operational issues in terms of site management of self-build units on larger development schemes operated by larger housebuilders.

The issue of self-build on larger housing sites was considered by the Inspector at the Blaby Part 2 Local Plan Examination. In recommending modifications to remove the requirement on a large housing allocation, the Inspector raised concerns over the robustness of the Self-Build Register as evidence of actual demand, the practical problems of providing self-build plots on larger sites, the risk of plots lying vacant and potential impacts on the viability of large sites.

Policy 13 should therefore be amended to remove the requirement to provide self-build plots on sites over 100 dwellings and frame the policy to reflect the aspiration to support self-build housing in the Borough.

The Policy also requires 4% of market dwellings to be constructed to M4(3) standards to enable wheelchair accessibility. This specific requirement is not supported by sufficiently robust evidence and should be deleted.

Changes to Policy

The following changes to Policy 13 are proposed:

Policy 13

Type and Mix of Housing

Housing needs will be met by development providing a mix of dwelling types and sizes to meet current and forecast accommodation needs.

Market Housing

Proposals for market housing will be supported where they provide a mix of housing ~~in line with~~reflecting the following targets:

- ~~5~~x-~~x~~% - 1 bedroom flats
- ~~5~~x-~~x~~% - 2 bedroom flats
- ~~20~~x-~~x~~% - 2 bedroom houses
- ~~53~~x-~~x~~% - 3 bedroom houses
- ~~16~~x-~~x~~% - 4 bedroom houses
- ~~1~~x-~~x~~% - 5 or more bedroom houses

~~Exceptions to this mix will be supported where they are evidenced by a robust assessment of needs at an appropriate local level.~~In applying these targets, the Council will take into account site specific circumstances, viability issues and evidence of local needs.

Affordable Housing

Proposals for affordable housing will be supported where they provide mix of housing ~~in line with~~reflecting the following targets:

- ~~19~~x-~~x~~% - 1 bedroom flats
- ~~12~~x-~~x~~% - 2 bedroom flats
- ~~32~~x-~~x~~% - 2 bedroom houses
- ~~27~~x-~~x~~% - 3 bedroom houses
- ~~9~~x-~~x~~% - 4 bedroom houses
- ~~2~~x-~~x~~% - 5 or more bedroom houses

~~In applying these targets, the Council will take into account site specific circumstances, viability issues and evidence of local needs.~~Exceptions to this mix will be accepted only where they are evidenced by a robust assessment of needs at an appropriate local level.

Self-build and custom build housing

~~Proposals for self and custom build housing will be supported in suitable locations. The Council will maintain a register of prospective self and custom house builders and have regard to the register in its decision making, plan making, housing and regeneration functions.~~

~~On sites of more than 100 dwellings, provision should be made for a proportion of serviced plots of land to contribute towards meeting the evidenced demand for self build and custom build housing in Northampton. Serviced plots of land for self build and custom build housing will also be supported on other allocated sites or permitted windfall sites where, overall, this would not result in an over provision of this type of housebuilding when compared with the Council's supply/demand balance.~~

The Council will support proposals for self-build and custom build housing which include the creation of low cost and affordable housing.

Specialist Accommodation

The Council will support schemes that provide specialist accommodation that promotes independent living. Such schemes are particularly supported in areas with easy access to services and facilities, including public transport and retail and service centres. Proposals should be designed in a manner which will meet the specialised nature and care requirements of prospective occupiers.

Accessible Housing

To meet the needs of the Borough's residents and to deliver dwellings capable of meeting their occupants' changing circumstances over their lifetime, the Council will support the provision of an appropriate proportion of residential development ~~must be~~ designed to meet the requirements of M4(2) or its successor standard.

~~4% of all new market dwellings and 8% of affordable dwellings should be constructed to M4(3) standards, or their successor, to enable wheelchair accessibility.~~

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 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		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))

Miller Homes has interests in land adjacent to Northampton falling within Wellingborough District Council's area and has particular concerns about the approach taken in relation to the Duty to Cooperate and the failure to consider reasonable alternatives to address shortfalls in supply. It is important therefore that they are represented at the 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)	✓
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	14/5/19.
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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



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

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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)

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- d) Agent / Consultant (on behalf of) ☒
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**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		Guy
Last name		Longley
Job title (where relevant)		Executive Director
Organisation (where relevant)	Miller Homes c/o Agent	Pegasus Group
Address line 1		4 The Courtyard
Line 2		Church Street
Line 3		Lockington
City / Town		Derby
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Part B: Representation(s)

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Not prepared in accordance with the Local Development Scheme				
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In the context of the shortfall in housing provision for Northampton, the Council has failed to properly investigate other options for addressing likely shortfalls through discussions with adjoining authorities, including Wellingborough District Council.

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Not justified	✓
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
		Policy 33	

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.

Policy 33 sets out a list of sites allocated for development in the plan. This appears to largely replicate Policy 12 which lists sites allocated for housing and/or housing led development, although there are some differences in the list of sites, with more sites included in Policy 33. It is assumed that this is because Policy 33 deals with all development proposals not just housing. It is noted that the Proposals Map only refers to Policy 12 in its Key and there is no reference to Policy 33.

The replication of policies should be addressed and clarified, with Policy 33 amended to deal with non-residential allocations.

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Equality Monitoring Form



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Not justified	✓
Not effective	✓
Not consistent with national policy	

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	Paras 116-126		

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Paragraphs 116-126 of Chapter 7 to the Part 2 Plan set out the proposed approach to adjusting the housing trajectory to deal with shortfalls in provision in Northampton Borough over the early part of the plan period. Paragraph 116 notes that between 2011-2018, delivery has been 1,475 dwellings short of requirement to provide 6,613 dwellings over that period. This represents a 22% shortfall against requirements and is a significant issue. This failure to meet housing needs also means that affordable housing needs are not being met. The West Northamptonshire Joint Authorities Monitoring Report 2017-2018 records a total of 668 affordable houses being completed in the Northampton Related Development Area (NRDA) between 2015-2018. The Joint Core Strategy (JCS) expected some 5,115 dwellings to be completed in the NRDA in this period with a target of 35% (1,790 dwellings) being affordable. This shows that there are significant shortfalls in affordable provision for the NRDA.

To deal with this shortfall the Part 2 Plan proposes a flat rate delivery of 1,136 dwellings from 2019-2024.

Paragraph 120 advises that the Council has researched alternative sites in the borough exhaustively and there are no other sources of supply that could address this short-term shortfall. Policy 12 proceeds to allocate a total of 81 housing sites ranging in size from 2 to 800 dwellings, to provide a total of 4,538 dwellings. It is understood that half of the sites are located on brownfield sites and around 1,000 of the proposed dwellings are in lower value zones in the City where there may be issues of viability. This suggests that delivery on a number of proposed allocations will be challenging.

The approach the Part 2 Plan has taken has been to limit its approach to accommodating the shortfall to potential sites within its administrative area. This has meant that the Council has had to propose the allocation of a large number of sites for housing development across the city. It has failed to consider reasonable alternatives to address this shortfall through discussions with neighbouring authorities through the Duty to Cooperate, including Wellingborough District Council. As a result, the potential for sustainable growth on the edge of Northampton to ensure that the shortfalls early in the plan period are met as soon as possible has not been properly considered.

The adjustment of the trajectory to effectively back-phase housing provision is not supported as it fails to address clear housing needs in the early part of the plan period and fails to make-up existing shortfalls in provision. For five-year land supply, the National Planning Policy Framework (NPPF) is clear that shortfalls should be made up as soon as possible.

The attached Table 1 looks at the proposed revised delivery trajectory against the JCS expectations. This shows the shortfall increasing up to 2022-23 to some 3,500 dwellings.

The proposed approach set out in the Part 2 Plan fails to properly address critical shortfalls in provision in Northampton Borough and means that there will continue to be a shortfall in provision until the latter stages of the plan period. This means that the Council's failure to address real housing needs will continue.

There are opportunities for the early delivery of housing on the edge of Northampton to help to address shortfalls in provision. The Plan fails to address these opportunities by not working proactively through the Duty to Cooperate with neighbouring authorities.

The West Northamptonshire authorities are commencing a review of the Strategic Plan with consultation scheduled for August 2019. This will not address immediate issues of shortfalls in the early part of the plan period and as currently framed does not present a proactive consideration of opportunities for growth to the east of Northampton within Wellingborough.

To address the issues of shortfall, the Council should commit to an early review of the Part 2 Plan, working in conjunction with Daventry District Council, South Northamptonshire and Wellingborough to identify sites for development adjoining Northampton to address housing shortfalls pending the completion of a wider strategic review of the plan.

Table 1: Analysis of Trajectory

	JCS	Cumulative	Actual Comps	New Trajectory	Cumulative	Shortfall Against JCS
2011-12	423	423	423		423	0
2012-13	516	939	516		939	0
2013-14	785	1,724	834		1,773	49
2014-15	1,039	2,763	877		2,650	-113
2015-16	1,132	3,895	739		3,389	-506
2016-17	1,292	5,187	884		4,273	-914
2017-18	1,426	6,613	865		5,138	-1,475
2018-19	1,544	8,157		673	5,811	-2,346
2019-20	1,588	9,745		1,136	6,947	-2,798
2020-21	1,491	11,236		1,136	8,083	-3,153
2021-22	1,355	12,591		1,136	9,219	-3,372
2022-23	1,278	13,869		1,136	10,355	-3,514
2023-24	1,025	14,894		1,136	11,491	-3,403
2024-25	900	15,794		1,476	12,967	-2,827
2025-26	875	16,669		1,476	14,443	-2,226
2026-27	815	17,484		1,476	15,919	-1,565

2027-28	695	18,179		1,476	17,395	-784
2028-29	694	18,873		1,476	18,871	-2
Total	18,873		5,138	13,733		

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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 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		Yes, I wish to participate at the oral examination	✓

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))

Miller Homes has interests in land adjacent to Northampton falling within Wellingborough District Council's area and has particular concerns about the approach taken in relation to the Duty to Cooperate and the failure to consider reasonable alternatives to address shortfalls in supply. It is important therefore that they are represented at the 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)	✓
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	14/6/19
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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



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:

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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		Guy
Last name		Longley
Job title (where relevant)		Executive Director
Organisation (where relevant)	Miller Homes c/o agent	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.

2: Do you consider the Northampton Local Plan Part 2 to be legally compliant?	Yes		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				
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.

In the context of the shortfall in housing provision for Northampton, the Council has failed to properly investigate other options for addressing likely shortfalls through discussions with adjoining authorities, including Wellingborough District Council.

3: Do you consider the Northampton Local Plan Part 2 to be sound?	Yes		No	✓
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3 (1): If NO , is this because it is: (please tick all that 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?	Paragraph number	Policy number	Policies Maps
	236-241 Monitoring		

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.

Chapter 14 of the Submission Draft Plan sets out the approach to implementation and monitoring of the plan. Monitoring indicators are set out for the policies included in the plan. For Policy 12 the indicator refers to the annual preparation of a 5 year housing land supply. For Policy 33, Development Allocations, the monitoring framework advises that progress will be monitored through planning applications and annual monitoring reports.

The proposed approach to implementation and monitoring is deficient. The suggested indicator for housing delivery is not clear in setting a specific target or identifying triggers or mechanisms to address issues relating to the under-delivery of housing.

We have made separate comments in relation to the Part 2 Plans proposal to adjust the JCS housing trajectory to back-phase housing delivery. As already set out, this fails to address critical shortfalls in delivery of housing in the early part of the plan period to meet real needs. The plan as framed fails to address this issue.

The plan should include a commitment to immediately commence the preparation of a Joint Plan with neighbouring authorities to identify additional allocations adjoining Northampton to address housing shortfalls pending the preparation of a wider review of the Strategic 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

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Paragraph	
Comments	

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No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination	✓
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When the Northampton Local Plan Part 2 has been adopted	✓
Other (please specify)	

10: Signature		Date	14/5/19
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☒

Yes (please tick)

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**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		Guy
Last name		Longley
Job title (where relevant)		Executive Director
Organisation (where relevant)	Miller Homes c/o agent	Pegasus Group
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Line 2		Church Street
Line 3		Lockington
City / Town		Derby
County		Derbyshire
Postcode		DE74 2SL
Telephone number		
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Part B: Representation(s)

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Not consistent with the regulatory requirements for consultation				
Not compliant with the duty to cooperate				✓
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In the context of the shortfall in housing provision for Northampton, the Council has failed to properly investigate other options for addressing likely shortfalls through discussions with adjoining authorities, including Wellingborough District Council.

3: Do you consider the Northampton Local Plan Part 2 to be sound?	Yes		No	✓
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3 (1): If NO, is this because it is: (please tick all that 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?	Paragraph number	Policy number	Policies Maps
	74		

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 74 of the Submission Draft Plan sets out the vision for the Part 2 Plan and explains that it draws on the vision as set out in the West Northamptonshire Joint Core Strategy (JCS), amended to reflect the particular characteristics relevant to Northampton.

The proposed vision refers to Northampton being at the heart of West Northamptonshire and playing a key role in the Oxford-Cambridge corridor. It is not appropriate for the vision for the Part 2 Plan to include reference to the Oxford-Cambridge corridor without consideration of the associated growth implications. These are different to the levels of growth set out in the JCS and proposed to be delivered through the Part 2 Plan.

The West Northamptonshire Joint Planning and Infrastructure Board has recently considered a report on the proposed Issues Consultation for the new West Northamptonshire Strategic Plan. This outlines a potential Arc-related growth scenario that would result in a requirement for 61,700 dwellings between 2019 and 2041, an annual rate of 2,800 dwellings compared with the JCS provision of 1,048 dwellings a year. The Issues consultation is scheduled to commence in August 2019.

The Vision for the Part 2 Plan should be amended to remove reference to the Oxford-Cambridge Corridor, with the text making it clear that the implications of the growth implications for the Oxford-Cambridge Arc will be addressed through the new West Northamptonshire Strategic Plan.

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SUSTAINABILITY APPRAISAL

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Paragraph	
Comments	

HABITATS REGULATIONS ASSESSMENT

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Paragraph	
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Comments	
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No , I do not wish to participate at the oral examination		Yes , I wish to participate at the oral examination	✓
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10: Signature		Date	14/5/19
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