

#109

COMPLETE

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Page 1

**Q1** 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.

I agree

Page 2: Part A: Personal Details

**Q2** Please provide your contact details in the boxes below. If you are an agent acting for another, please enter your client's details.

Name (required)	Ruth Austen
Job title (if appropriate)	Environmental Health and Licensing Manager
Organisation (where relevant)	Northampton Borough Council
Address 1 (required)	The Guildhall
Address 2	St Giles Sq
Town	Northampton
Postcode (required)	NN1 1DE
Email Address	[REDACTED]
Phone Number	[REDACTED]

**Q3** Are you making this representation as: Local Authority or Town/Parish Council

**Q4** Please enter type of organisation (for example, planning consultant, etc.)

further comments on behalf of Environmental Health and Licensing Team

Page 3: Agent details

**Q5** Please enter your details below: Respondent skipped this question

Page 4: Part B: Representation(s)

**Q6** Do you consider the Northampton Local Plan Part 2 to be legally compliant? **Yes**

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Page 5: Part B: Legal Compliance

**Q7** Do you consider the document to be not legally compliant because it is: (please tick all that you think apply)

**Respondent skipped this question**

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Page 6: Part B: Soundness

**Q8** Do you consider the Northampton Local Plan Part 2 to be sound? **No**

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Page 7: Part B: Soundness

**Q9** Do you consider the document to not be sound because it is: (please tick all that you think apply)

**Not justified,  
Not consistent with national policy**

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Page 8: Part B: Representation(s) - Local Plan Part 2 draft

**Q10** To which part of the Local Plan does this representation relate?

Paragraph number **196**

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**Q11** 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.

recommend that the paragraph is amended as shown in brackets below to provide clarity on requirements.

The Council's Low Emission Strategy (LES) aims to improve air quality and health across Northampton by reducing vehicle emissions through the accelerated take up of cleaner fuels and technologies (and the implementation of mitigation measures in new developments.) Evidence for the strategy found that whilst levels of nitrogen dioxide have improved in some areas of Northampton, concentrations (of NO<sub>2</sub> and particulate matter specifically PM 10's) at key locations have remained elevated over the last decade and at some locations, concentrations have increased, (resulting in declarations of Air Quality Management Areas.)

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**Q12** Do you wish to comment on other parts of the draft Local Plan? **Yes**

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Page 9: Part B: Representation(s) - Local Plan Part 2 draft (2/20)

**Q13** To which part of the Local Plan does this representation relate?

Paragraph number **197**

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**Q14** 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.

correction / amendment of paragraph to provide clarity on the current situation and ensure that the plan shows correct information.  
amendments shown in brackets

There are currently 7 Air Quality Management Areas (see Figure 15.– this map is missing the northern part of the Borough and does not show the Harborough Road AQMA). These are areas which exceed the Government's air quality objective and where there is relevant exposure to the public. (A consultation is presently underway to amalgamate all the central AQMA's into one large AQMA covering the town centre to promote consistency in applying the LES).

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**Q15** Do you wish to comment on other parts of the draft Local Plan? **Yes**

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Page 10: Part B: Representation(s) - Local Plan Part 2 draft (3/20)

**Q16** To which part of the Local Plan does this representation relate?

Policy number **28**

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**Q17** 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 Northampton Low Emissions Strategy is not mentioned in this policy, nor is there any mention of taxis or the plan to provide rapid charging points for electric taxis\*

It is therefore recommended that the policy is amended with the points in brackets to cover the following in accordance with the requirements of paragraphs 102d, 103 and 181 of the NPPF

Developments should be designed to incorporate, demonstrate and achieve the following sustainable travel principles:

(Provision of electric car charging points or the infrastructure to provide them at a later date.

Need for an air quality impact assessment in certain circumstances.)

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**Q18** Do you wish to comment on other parts of the draft Local Plan? **Yes**

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Page 11: Part B: Representation(s) - Local Plan Part 2 draft (4/20)

**Q19** To which part of the Local Plan does this representation relate?

Policy number **30**

**Q20** 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 Northampton Low Emissions Strategy is not mentioned in this policy, nor are taxis or the plan to provide rapid charging points for electric taxis.

It is therefore recommended that the policy is amended with the addition of the point shown in brackets

In order to deliver a high quality, accessible sustainable transport network, the Council will require developers to fund and financially contribute towards a range of transport schemes through the relevant legal agreements and planning conditions, in order to meet the growth requirements of this local plan, to mitigate the impacts of developments and to ensure they create a high quality, sustainable, accessible development that is well connected to the rest of the Borough. Developments will be supported where the developer can demonstrate that they do not have an unacceptable transport impact, that they promote sustainable forms of travel and they include sufficient mitigation measures, (in accordance with the Northampton Low Emissions Strategy).

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**Q21** Do you wish to comment on other parts of the draft Local Plan? **Yes**

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Page 12: Part B: Representation(s) - Local Plan Part 2 draft (5/20)

**Q22** To which part of the Local Plan does this representation relate?

Policy number **34**

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**Q23** 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.

It is suggested that the policy is amended with the addition of the comments shown in brackets to ensure compliance with paragraphs 178, and 180 of the NPPF 2019

On site LAA0333, the Council will support the delivery of at least 200 dwellings, subject to analysis of capacity (and to achieving a suitable standard of residential amenity with regard to noise and air quality, ) on the residual areas not required for commercial and/ or passenger rail services.

note SuDS may not be suitable on this site due to the previous contaminative use so the following amendment is recommended

Subject to detailed (contaminated land ) assessment, development on this site should maximise the use of Sustainable Drainage Systems (SuDS).

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**Q24** Do you wish to comment on other parts of the draft Local Plan? **Yes**

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Page 13: Part B: Representation(s) - Local Plan Part 2 draft (6/20)

**Q25** To which part of the Local Plan does this representation relate?

Policy number

**35**

**Q26** 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.

It should be noted that SuDS may not be suitable on this site due to the previous contaminative use

It is therefore suggested that the policy is amended to..

Subject to detailed (contaminated land) assessment, development on this site should maximise the use of Sustainable Drainage Systems (SuDS).

**Q27** Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 14: Part B: Representation(s) - Local Plan Part 2 draft (7/20)

**Q28** To which part of the Local Plan does this representation relate?

Policy number

**36**

**Q29** 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.

In order to meet the requirements of paragraph 108 a of the NPPF 2019 Criteria should include

Air Quality and Noise impact from the Brackmills Industrial Estate

**Q30** Do you wish to comment on other parts of the draft Local Plan? **Yes**

Page 15: Part B: Representation(s) - Local Plan Part 2 draft (8/20)

**Q31** To which part of the Local Plan does this representation relate?

Policy number

**38**

**Q32** 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.

note SuDS may not be suitable on this site due to the previous contaminative use. it is therefore suggested that the policy is amended with the words in brackets.

Subject to detailed (contaminated land )assessment, development on this site should maximise the use of Sustainable Drainage Systems (SuDS).

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**Q33** Do you wish to comment on other parts of the draft Local Plan? **Yes**

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Page 16: Part B: Representation(s) - Local Plan Part 2 draft (9/20)

**Q34** To which part of the Local Plan does this representation relate?

Paragraph number **table 10**

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**Q35** 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.

it is recommended that the amendments shown in brackets are added to achieve compliance with the requirements of paragraph 127f and 180a of the NPPF 2019

#### 4. Amenity and layout

This policy aims to ensure that the right level of amenity space is provided and the appropriate layout is designed (having regard to noise and air quality) when considering proposals. This will ensure that people's wellbeing are supported.

Target: schemes will be compliant with the space and amenity standards including the nationally described technical standards

#### 18. Residential development on upper floors

This policy seeks to ensure that residential schemes above the ground floors are undertaken in a manner which would not be detrimental to heritage and not affected by environmental concerns (such as noise and odour.)

Target: This is not an area which can be targeted. These units tend to be considered for alternative uses as and when they become vacant. This is more likely to be led by the open market

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**Q36** Do you wish to comment on other parts of the draft Local Plan? **No**

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Page 17: Part B: Representation(s) - Local Plan Part 2 draft (9/20)

**Q37** To which part of the Local Plan does this representation relate?

**Respondent skipped this question**

**Q38** 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.

Respondent skipped this question

**Q39** Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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Page 18: Part B: Representation(s) - Local Plan Part 2 draft (10/20)

**Q40** To which part of the Local Plan does this representation relate?

Respondent skipped this question

**Q41** 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.

Respondent skipped this question

**Q42** Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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Page 19: Part B: Representation(s) - Local Plan Part 2 draft (11/20)

**Q43** To which part of the Local Plan does this representation relate?

Respondent skipped this question

**Q44** 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.

Respondent skipped this question

**Q45** Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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Page 20: Part B: Representation(s) - Local Plan Part 2 draft (12/20)

**Q46** To which part of the Local Plan does this representation relate?

Respondent skipped this question

**Q47** 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.

Respondent skipped this question

**Q48** Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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Page 21: Part B: Representation(s) - Local Plan Part 2 draft (13/20)

**Q49** To which part of the Local Plan does this representation relate?

Respondent skipped this question

**Q50** 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.

Respondent skipped this question

**Q51** Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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Page 22: Part B: Representation(s) - Local Plan Part 2 draft (14/20)

**Q52** To which part of the Local Plan does this representation relate?

Respondent skipped this question

**Q53** 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.

Respondent skipped this question

**Q54** Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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Page 23: Part B: Representation(s) - Local Plan Part 2 draft (15/20)

**Q55** To which part of the Local Plan does this representation relate?

Respondent skipped this question



**Q56** 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.

Respondent skipped this question

**Q57** Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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Page 24: Part B: Representation(s) - Local Plan Part 2 draft (16/20)

**Q58** To which part of the Local Plan does this representation relate?

Respondent skipped this question

**Q59** 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.

Respondent skipped this question

**Q60** Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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Page 25: Part B: Representation(s) - Local Plan Part 2 draft (17/20)

**Q61** To which part of the Local Plan does this representation relate?

Respondent skipped this question

**Q62** 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.

Respondent skipped this question

**Q63** Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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Page 26: Part B: Representation(s) - Local Plan Part 2 draft (18/20)

**Q64** To which part of the Local Plan does this representation relate?

Respondent skipped this question

**Q65** 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.

Respondent skipped this question

**Q66** Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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Page 27: Part B: Representation(s) - Local Plan Part 2 draft (19/20)

**Q67** To which part of the Local Plan does this representation relate?

Respondent skipped this question

**Q68** 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.

Respondent skipped this question

**Q69** Do you wish to comment on other parts of the draft Local Plan?

Respondent skipped this question

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Page 28: Part B: Representation(s) - Local Plan Part 2 draft (20/20)

**Q70** To which part of the Local Plan does this representation relate?

Respondent skipped this question

**Q71** 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.

Respondent skipped this question

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Page 29: Part B: Representation(s) - Sustainability Appraisal

**Q72** Do you wish to comment on the Sustainability Appraisal?

No

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Page 30: Part B: Representation(s) - Sustainability Appraisal

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<b>Q73</b> To which part of the Sustainability Appraisal does this representation relate?	<b>Respondent skipped this question</b>
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<b>Q74</b> Comments	<b>Respondent skipped this question</b>
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<b>Q75</b> Do you wish to comment on other parts of the Sustainability Appraisal?	<b>Respondent skipped this question</b>
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Page 31: Part B: Representation(s) - Sustainability Appraisal (2/6)

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<b>Q76</b> To which part of the Sustainability Appraisal does this representation relate?	<b>Respondent skipped this question</b>
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<b>Q77</b> Comments	<b>Respondent skipped this question</b>
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<b>Q78</b> Do you wish to comment on other parts of the Sustainability Appraisal?	<b>Respondent skipped this question</b>
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Page 32: Part B: Representation(s) - Sustainability Appraisal (3/6)

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<b>Q79</b> To which part of the Sustainability Appraisal does this representation relate?	<b>Respondent skipped this question</b>
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<b>Q80</b> Comments	<b>Respondent skipped this question</b>
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<b>Q81</b> Do you wish to comment on other parts of the Sustainability Appraisal?	<b>Respondent skipped this question</b>
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Page 33: Part B: Representation(s) - Sustainability Appraisal (4/6)

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<b>Q82</b> To which part of the Sustainability Appraisal does this representation relate?	<b>Respondent skipped this question</b>
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<b>Q83</b> Comments	<b>Respondent skipped this question</b>
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<b>Q84</b> Do you wish to comment on other parts of the Sustainability Appraisal?	<b>Respondent skipped this question</b>
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Page 34: Part B: Representation(s) - Sustainability Appraisal (5/6)

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<b>Q85</b> To which part of the Sustainability Appraisal does this representation relate?	<b>Respondent skipped this question</b>
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**Q86** Comments

Respondent skipped this question

**Q87** Do you wish to comment on other parts of the Sustainability Appraisal?

Respondent skipped this question

Page 35: Part B: Representation(s) - Sustainability Appraisal (6/6)

**Q88** To which part of the Sustainability Appraisal does this representation relate?

Respondent skipped this question

**Q89** Comments

Respondent skipped this question

Page 36: Part B: Representation(s) - Habitats Regulation Assessment

**Q90** Do you wish to comment on the Habitats Regulation Assessment?

No

Page 37: Part B: Representation(s) - Habitats Regulations Assessment

**Q91** To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

**Q92** Comments

Respondent skipped this question

**Q93** Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

Page 38: Part B: Representation(s) - Habitats Regulations Assessment (2/6)

**Q94** To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

**Q95** Comments

Respondent skipped this question

**Q96** Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

Page 39: Part B: Representation(s) - Habitats Regulations Assessment (3/6)

**Q97** To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

**Q98** Comments

Respondent skipped this question

**Q99** Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

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Page 40: Part B: Representation(s) - Habitats Regulations Assessment (4/6)

**Q100** To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

**Q101** Comments

Respondent skipped this question

**Q102** Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

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Page 41: Part B: Representation(s) - Habitats Regulations Assessment (5/6)

**Q103** To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

**Q104** Comments

Respondent skipped this question

**Q105** Do you wish to comment on other parts of the Habitats Regulations Assessment?

Respondent skipped this question

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Page 42: Part B: Representation(s) - Habitats Regulations Assessment (6/6)

**Q106** To which part of the Habitats Regulations Assessment does this representation relate?

Respondent skipped this question

**Q107** Comments

Respondent skipped this question

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Page 43: Part B: Representation(s) - Examination

**Q108** 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

**Q109** 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))

would be willing to do so if required,

**Q110** Do you wish to be notified when:

**The Council submit the Northampton Local Plan (Part 2) to the Government?**

,

**The Inspector's report is published?**

Page 44: Equality Monitoring

[REDACTED]

[REDACTED]

[REDACTED]

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