



**NORTHAMPTON LOCAL PLAN PART 2  
PROPOSED SUBMISSION ROUND 2 CONSULTATION  
REGULATION 19**

**SUMMARY OF REPRESENTATIONS**  
December 2020

<b>Representation reference:</b> 35/1/1  <b>Name:</b> Historic England	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective - not consistent with national policy	<b>Comments:</b> Thank you for providing the Heritage Impact Assessment and the amendments to the policies, it is considered that our comments can be addressed by Statement of Common Ground.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 62/1/11  <b>Name:</b> Northamptonshire County Council / North Northants JPU	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> General. We note that there are a number of other policies that can significantly contribute to health and wellbeing and we support their inclusion and effective implementation, recognising the contribution they can make to health and wellbeing, notably policies on; <ul style="list-style-type: none"> <li>• Placemaking</li> <li>• Design</li> <li>• Neighbourhood centres</li> <li>• Sports facilities and playing pitches</li> <li>• Community facilities</li> <li>• Green infrastructure</li> <li>• Open spaces</li> </ul>	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 97/1/3  <b>Name:</b> Clayson Country Homes	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> At the outset, our client commends the efforts of the Borough Council up to this point in progressing their Part 2 Local Plan, particularly in light of the acute housing land supply issues which are faced within the Borough and the significant threat to housing delivery which the ongoing COVID 19 pandemic continues to have.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 97/1/4	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b>	<b>Comments:</b> It is refreshing to learn that the Borough Council are continuing to expedite the production of the Part 2 Local Plan and the	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<p><b>Name:</b> Clayson Country Homes</p>		<p>Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>following comments are framed against the current macro-economic climate, the challenges faced by the aforementioned pandemic and the changes which the organisation faces as it moves towards unitary status along with Daventry and South Northants Districts.</p> <p>The following are set out in order of appearance within the consultation document and do not seek to provide and exhaustive appraisal of the emerging DPD but rather responds to those pertinent points relevant to the respondent's landholding;</p> <p>It is agreed that an important challenge for Northampton, which the emerging LPP2 should seek to meet, is that of housing delivery for all tenures. The document's acknowledgement of the challenges posed by the dense built form within the legislative boundary of Northampton is welcomed and only serves to highlight the significant opportunity which greenfield sites, such as the client's, offer to meeting the existing and future development needs of the Borough.</p> <p>Furthermore, whilst there has been a historic under delivery of housing within the plan area since 2011, this has been further compounded in 2020 whereby almost two quarters of anticipated delivery has been lost due to the aforementioned ongoing global health crisis.</p>		
<p><b>Representation reference:</b> 97/1/23</p> <p><b>Name:</b> Clayson Country Homes</p>	<p><b>Refers to:</b> The Plan</p>	<p><b>Legal compliance and soundness:</b></p> <p>Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b></p> <p>It is considered that the document has been positively prepared with the objective to contribute towards the achievement of sustainable development. Whilst the above commentary has highlighted where elements of the document are ambiguous and unnecessarily duplicate provisions which are made elsewhere within the development plan or Framework, it remains the respondent's opinion that the document (subject to the above) is 'sound'.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

<b>Representation reference:</b> 97/1/26  <b>Name:</b> Clayson Country Homes	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Notwithstanding the points raised above, the client is in agreement that the LPP2 presents the most suitable strategy, when assessed against the reasonable alternatives, which is both deliverable and consistent with national policy. Therefore, against the backdrop of our client's land and property interests, the LPP2 is considered both legally compliant and sound in its content.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 144/1/3  <b>Name:</b> Daventry District Council	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> The progress being made on the preparation of the Northampton Part 2 Local Plan is welcomed by Daventry District Council The two issues identified at the first submission stage by Daventry District Council, relating to policy 24 (Open Space) and Gypsies and travellers, have been satisfactorily addressed and this is welcomed. In Daventry District Council's view, there are no duty to co-operate or legal compliance issues.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 148/1/4  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Our client commends the efforts of the Borough Council up to this point in progressing their Part 2 Local Plan, particularly in light of the acute housing land supply issues which are faced within the Borough and the significant threat to strategic development of all types which the ongoing COVID 19 pandemic continues to have.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 148/1/5  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> It is refreshing to learn that the Borough Council are continuing to expedite the production of the Part 2 Local Plan and the following comments are framed against the current macro-economic climate, the challenges faced by the aforementioned pandemic and the changes which the organisation faces as it moves towards unitary status along with Daventry and South Northants Districts	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<b>Representation reference:</b> 148/1/21  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> It is considered that the document has been positively prepared with the objective to contribute towards the achievement of sustainable development. Whilst the above commentary has highlighted where elements of the document are ambiguous and unnecessarily duplicate provisions which are made elsewhere within the development plan or Framework, it remains the respondent's opinion that the document (subject to the above) is 'sound'.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 195/1/3  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> At the outset, our client commends the efforts of the Borough Council up to this point in progressing their Part 2 Local Plan, particularly in light of the acute housing land supply issues which are faced within the Borough and the significant threat to housing delivery which the ongoing COVID 19 pandemic continues to cause.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 195/1/4  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> It is refreshing to learn that the Borough Council are continuing to expedite the production of the Part 2 Local Plan and the following comments are framed against the current macro-economic climate, the challenges faced by the aforementioned pandemic and the changes which the organisation faces as it moves towards unitary status along with Daventry and South Northants District.  The following are set out in order of appearance within the plan and do not seek to provide wholesale commentary in respect of the document but rather responds to those points relevant to the respondent's landholding;  It is agreed that an important challenge for Northampton, which the emerging LPP2 should seek to meet, is that of housing delivery for all tenures. The documents	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

			<p>acknowledgement of the challenges posed by the dense built form within the legislative boundary of Northampton is welcomed and only serves to highlight the significant opportunity which greenfield sites, such as the client's, offer to meeting the future development needs of the Borough.</p> <p>Furthermore, whilst there has been a historic under delivery of housing within the plan area since 2011, this has been further compounded in 2020 whereby almost two quarters of anticipated delivery has been stalled due to the ongoing global health crisis.</p>		
<p><b>Representation reference:</b> 195/1/21</p> <p><b>Name:</b> Mr B Cheer</p>	<p><b>Refers to:</b> The Plan</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> It is considered that the document has been positively prepared with the objective to contribute towards the achievement of sustainable development. Whilst the above commentary has highlighted where elements of the document are ambiguous and unnecessarily duplicate provisions which are made elsewhere within the development plan or Framework, it remains the respondent's opinion that the document (subject to the above) is 'sound'.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 195/1/25</p> <p><b>Name:</b> Mr B Cheer</p>	<p><b>Refers to:</b> The Plan</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Notwithstanding the points raised above, the client is in agreement that the LP2 presents the most suitable strategy, when assessed against the reasonable alternatives, which is both deliverable and consistent with national policy. Therefore, against the backdrop of our client's land and property interests, the LP2 is considered both legally compliant and sound in its content.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 197/1/3</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> The Plan</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p>	<p><b>Comments:</b> Northamptonshire County Council's Development Infrastructure and Funding and Growth team welcomes the opportunity to comment on the Draft Northampton Local Plan Part 2 (the Draft Plan) through the current Regulation 19</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

Northamptonshire County Council		Soundness: - not specified	(Round 2) consultation, supporting the development of planning policy at the local level. The comments contained within this response are supplementary to an earlier response, submitted in relation to the Round 1 consultation during June 2019, and should therefore be read in conjunction with our previous response.		
<b>Representation reference:</b> 197/1/24  <b>Name:</b> Northamptonshire County Council	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> 21. The County Council welcomes the approach adopted by Northampton Borough Council in preparing the Draft, which builds on the adopted West Northamptonshire Joint Core Strategy and positively supports the need for collaboration between local authorities and other partner organisations, to ensure that the ‘duty to co-operate’ obligation is met – particularly in relation to those areas of the borough allocated as Sustainable Urban Extensions (SUEs) and at other strategic housing sites including those in the Northampton Related Development Area.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 201/1/17  <b>Name:</b> Persimmon Homes	<b>Refers to:</b> The Plan and policies map	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective - not consistent with national policy	<b>Comments:</b> Along with David Wilson Homes, Persimmon Homes controls the Dallington Grange Sustainable Urban Extension (SUE), which is allocated for development in the adopted West Northamptonshire Joint Core Strategy, 2014 (JCS). An outline planning application for the SUE has achieved resolution to grant planning permission and it is anticipated that the Section 106 agreement will be finalised shortly.	<b>Suggested changes:</b> We would reiterate our earlier comments that it would be helpful for both decision-makers and stakeholders if the proposals map associated with the Part 2 Plan illustrated the committed SUEs around Northampton rather than these	<b>Officer comments:</b> The Local Plan Part 2 relates to Northampton's borough boundary. The SUEs are shown in the West Northamptonshire Joint Core Strategy (Local Plan Part 1).

				simply being shown as "white land."	
<b>Representation reference:</b> 217/1/1  <b>Name:</b> National Grid	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> No comments.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 218/1/1  <b>Name:</b> Danelaw Real Estate	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Considers the plan to be legally compliant and sound.	<b>Suggested changes:</b> None	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 225/1/1  <b>Name:</b> Anthony Smith	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements - not compliant with duty to cooperate	<b>Comments:</b> With the proposed increase in housing from 300 to 1100 houses Great Houghton would have a serious traffic problem. There is already a dangerous traffic problem with parked cars in the High Street for drivers to navigate. The junction with High Street and the Bedford Road is also very dangerous with no roundabout. The dramatic increase in traffic would be unsustainable through the village and would also create rabbit runs such as along Willow Lane. There are no facilities such as shop, school, bus route in the village which would mean driving to these facilities essential. There is only the village hall and playing field amenities which would be under increased pressure with such an increase in population. The very complicated means for village inhabitants to object to this plan (ie our email was rejected) has probably contributed to many not being able to object who would have wanted to.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The Council has undertaken a robust land availability assessment, as well as commissioned a detailed Heritage Impact Assessment and traffic modelling exercises. These assessments conclude that the development can be mitigated against and Policy 41 has been formulated to guide developers accordingly.



<p><b>Representation reference:</b> 225/1/2</p> <p><b>Name:</b> Anthony Smith</p>	<p><b>Refers to:</b> The Plan</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant:</p> <p>Plan is unsound: - not positively prepared - not justified</p>	<p><b>Comments:</b> The impact of this massive increase in housing to our quiet village will be very damaging. The congestion, noise and pollution of the increased traffic must be investigated. The safety of pedestrians, cyclists and traffic on already dangerous roads and junctions must be investigated. The lack of facilities ie school, shop, bus route, leisure centre must be investigated.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The Council has undertaken a robust land availability assessment, as well as commissioned a detailed Heritage Impact Assessment and traffic modelling exercises. These assessments conclude that the development can be mitigated against and Policy 41 has been formulated to guide developers accordingly.</p>
<p><b>Representation reference:</b> 228/1/1</p> <p><b>Name:</b> David Russell</p>	<p><b>Refers to:</b> The Plan</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - reason not specified</p>	<p><b>Comments:</b> The respondent indicated that the Plan was not legally compliant but gave no reason.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 238/1/3</p> <p><b>Name:</b> West Hunsbury Parish Council</p>	<p><b>Refers to:</b> The Plan and policies map</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> This objection concerns the failure of Local Plan Part 2 to allocate land as Amenity Green Space at the south of the wider Ladybridge Park/Wootton Brook Park open space (Map 1). This southernmost area comprises a multi-functional use area that is used for football pitches and various forms of informal recreation – such as walking, dog walking, picnics, informal sports and games.</p>	<p><b>Suggested changes:</b> Allocate Welland Valley FC as amenity green space.</p>	<p><b>Officer comments:</b> It is agreed that the evidence provided is sufficient to conclude that this site should be designated as an amenity green space. It is also noted that in the</p>

			<ul style="list-style-type: none"> <li>• The unallocated playing pitches are contiguous and used as one amenity area with the wider Ladybridge Park land to the north and east of the site</li> <li>• The more informal open space areas at Ladybridge/Wootton Brook Park, to the north and east of the objection site, are allocated as Amenity Green Space and benefit from the protection afforded to such land by Policy 28 of Local Plan Part 2.</li> <li>• There is clear and unambiguous evidence that the playing pitches have had continuous use as local amenity space and playing fields. The land was allocated as such in the 1997 Local Plan under Policy E6, Map 2</li> <li>• Part of the playing pitch site had originally been laid out as a cricket pitch before becoming ad hoc football pitches. This use was then formalised when the land was leased by Northampton Borough Council to Welland Valley Football Club (WVFC) who have improved the quality of the pitches. WVFC have been at this site since 2002.</li> <li>• By failing to protect the playing pitch/informal recreation area under Policy 28 is contrary to paragraph 97 of national planning policy</li> <li>• Sports pitches shown in figures 10, 11 and 12 of Part 3 of the Playing Pitch Strategy</li> </ul>		1997 Local Plan, the site had been allocated as greenspace. Modify the Policies Map and designate this area as amenity green space.
<b>Representation reference:</b> 244/1/5  <b>Name:</b> Bastion Group	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> The comments on the Plan and proposed changes requested as set out in these representations are limited in their nature, scale and extent but would ensure the Plan remains 'effective', 'justified' and 'consistent with national policy'. The changes are required to reinforce the overall general soundness of the Plan, which is vital to ensure that NBC can meet its objectively assessed housing need requirement, support economic growth and maintain its wider advantageous position in the Oxford to Cambridge Arc.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<b>Representation reference:</b> 248/1/2  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b>  Plan is unsound: - not effective	<b>Comments:</b> There are a number of improvements to the effectiveness in attached document. (which detail paragraph numbers).	<b>Suggested changes:</b> See comments.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 250/1/24  <b>Name:</b> St Clair Land and Developments LLP Old Bedford Road	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Whilst it is considered that whilst the document would benefit from revisions as set out above, the document does present a plan led approach to meeting those issues which are faced within the Borough. Given the acute housing needs issues faced in the area in recent years, it is considered that the emerging development plan document provides a positive vision and outlines a bold approach and framework to meeting both housing needs and other economic, social and environmental priorities.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Welcomed.
<b>Representation reference:</b> 250/1/25  <b>Name:</b> St Clair Land and Developments LLP Old Bedford Road	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> It is considered that the document has been positively prepared with the objective to contribute towards the achievement of sustainable development. Whilst the above commentary has highlighted where elements of the document are ambiguous and unnecessarily duplicate provisions which are made elsewhere within the development plan or Framework, it remains the respondent's opinion that the document (subject to the above) is 'sound'.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 250/1/30  <b>Name:</b> St Clair Land and Developments LLP Old Bedford Road	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Notwithstanding the points raised above, the client is in agreement that the LPP2 presents the most suitable strategy, when assessed against the reasonable alternatives, which is both deliverable and consistent with national policy. Therefore, against the backdrop of our client's land and property interests, the LPP2 is considered both legally compliant and sound in its content.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<b>Representation reference:</b> 251/1/2  <b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b>  Plan is unsound: - not justified - not effective - not consistent with national policy	<b>Comments:</b> Please see enclosed representations for justification of objection to the soundness of the Plan.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 229/1/2  <b>Name:</b> Barratt David Wilson Homes	<b>Refers to:</b> para. 1.1	<b>Legal compliance and soundness:</b>  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Paragraph 1.10 contains an error in so far so there is actually no legal duty to co-operate under the Local Act 2011 to consult with the Local Enterprise Partnership. The Town and County Planning (Local Planning England 2012) as amended, does not place a duty to co-operate with the LEPs and Local Nature Partnerships. Only regard must be had to their activities when preparing local plans, so long as their activities are relevant to plan-making.  Paragraph 1.13 states that the Statement of Common Ground (SOC) will be made prepared alongside the version of the Local Plan to be submitted to the Secretary of State. The NPPF states in paragraph 27, "in order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statement of common ground, documentation the cross boundary matters being addressed and progress in co-operating to address these. These should be produced using the approach set out in National Planning Guidance and be made publicly available through the plan-making process to provide transparency." The National Planning Practice Guidance states that "Authorities should have made a statement of common ground available on their website by the time they publish their draft plan, in order to provide communities and other Stakeholders with a transparent picture of how they have collaborated".	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The Localism Act 2011 introduced the Duty to Cooperate. The Town and Country Planning (Local Planning) (England) 2012 outlines the bodies prescribed for the purposes of meeting the legal duty to cooperate. Regulation 4 (2) sets out that Local Enterprise Partnerships should be involved in the DTC. This is outlined in Paragraph 1.11 of the LPP2. Paragraph 27 of the NPPF refers to strategic policies. The Northampton LPP2 does not

			The plan by delaying the SOC, NBC are not demonstrating their statutory duty of co-operation on strategic matters.		contain strategic policies; strategic policies for Northampton are contained in the Part 1 Local Plan - the West Northamptonshire Joint Core Strategy.
<p><b>Representation reference:</b> 229/1/3</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> para. 1.1</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Paragraph 1.1 does not refer to the review of the policies of the West Joint Core strategy Local Plan Part 1 (WNJCS) as required by Regulation 10A Town and Country (Local Planning) (England) Regulations 2012 (as amended), that was carried out in December 2019. As a result of the review, policies; SA,S3,S7,S11,C2,H2, H4,H6 and T5 required action, in order to conform with the NPPF 2019. In further representations, I raise concerns that the findings of the review have not been considered in this draft submission Local Plan Part 2. The draft plan, by virtue of being inconsistent with the review of the West Northants Joint Core Strategy findings, is therefore not consistent with national policy.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Include wording at para 1.1: and reviewed in December 2019 as set out in Regulation 10A Town and Country (Local Planning) (England) Regulations 2012 (as amended). Some policies within the West Northamptonshire Joint Core Strategy will be reviewed as a part of the West Northamptonshire Strategic Plan (WNSP) preparation. Where policies are out of date they are superseded by policies within the Northampton LPP2.</p>

					<p>* The WNJCS has its own SA policy which is in conformity with the NPPF,</p> <p>* Policy S3 should continue to be used for housing purposes and the LPP2 does this</p> <p>* Policy S7 Relates to employment evidence. Employment evidence for the WNSP will be reviewed. The LPP2 has its own up to date employment evidence</p> <p>* Policy S11 relates to low carbon and renewable energy and will be updated for the WNSP. The LPP2 contains policies in line with the latest Government guidance on reducing carbon emissions specifically in Policy 5 and throughout the LPP2</p> <p>* Policy C2 Relates to connections in</p>
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					<p>relation to new developments. This will be updated for WNSP. The LPP2 contains detailed policy on sustainable transport and travel in Policy 32</p> <p>* Policy H2 AH will be reviewed but remain valid for LPP2s</p> <p>* Policy H4 (Sustainable housing) will be updated in WNSP as now out of date. The LPP2 contains up to date requirements for housing in Policies 3, 5 and 14</p> <p>* Policy H6 (Gypsies, Travellers and Travelling Showpeople) will be reviewed for WNSP. Policy 16 of the LPP2 supersedes this policy.</p> <p>* Policy T5 relates to Towcester Racecourse which is not a concern for</p>
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					the Northampton LPP2
<p><b>Representation reference:</b> 200/1/3</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Chapter 1 and general</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> It is the HBF's opinion that the Northampton LPP2 makes inadequate reference to its strategic context. The adopted WNJCS established an objectively assessed housing need (OAHN) of 25,758 dwellings for Northampton. For the plan period 2011 – 2029, the adopted WNJCS sets out in Policy S3 a housing requirement of about 18,870 dwellings for Northampton. As set out in Policy 4 of the adopted WNJCS the remainder of Northampton's housing need is met by Sustainable Urban Extensions (SUEs) in the Northampton Related Development Area (NRDA) for 5,750 dwellings in Daventry and 3,850 dwellings in South Northamptonshire. The housing requirement set out in the adopted WNJCS is a minimum.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Paragraph 1.1 sets out the policy context for the LPP2. Throughout the document the strategic context is continually referenced, including through the strategic objectives.</p>
<p><b>Representation reference:</b> 200/1/4</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Chapter 1 and general</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The WNJCS was found sound on the basis that a review should be undertaken and adopted by 2020. It is proposed that the adopted WNJCS will be replaced by West Northamptonshire Strategic Plan (WNSP). The Joint Local Development Scheme (LDS) programmes Regulation 18 consultation in April 2019, Regulation 19 consultation in December 2020, submission for examination in April 2021, examination from September 2021 onwards and adoption by January 2022. The programmed adoption of the WNSP by January 2022 is 2 years later than the adoption date of 2020 for the review of the WNJCS on which the WNJCS was found sound. It is also noted that the Regulation 18 consultation was delayed until October rather than April 2019 so the preparation of the WNSP is already behind schedule.</p> <p>From December 2019 (5 years after adoption), the strategic policies including the OAHN / housing requirement in the adopted WNJCS should be considered out of date. There is</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The Policies of the West Northamptonshire Joint Core Strategy were reviewed in December 2019 in line with Regulation 10A of the Town and Country (Local Planning) (England) Regulations 2012 (as amended). The proposed revised standard methodology for the calculation of housing has not yet been implemented.</p>



			potentially a gap of at least 2 years before adoption of the WNSP whilst strategic policies of the adopted WNJCS should be considered out of date. Under the 2019 NPPF, the Council should have a 5 YHLS against either a housing requirement set out in an adopted Plan (2,367 dwellings per annum in adopted WNJCS) or an LHN (2,139 dwellings per annum) where strategic policies are more than 5 years old (para 73). If the Government’s proposals for a revised standard methodology for the calculation of LHN are implemented, then the LHN for WN will increase to 2,645 dwellings per annum.		
<p><b>Representation reference:</b> 229/1/1</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Chapter 1</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p>	<p><b>Comments:</b> Paragraph 1.10 contains an error in so far so there is actually no legal duty to co-operate under the Local Act 2011 to consult with the Local Enterprise Partnership. The Town and County Planning (Local Planning England 2012) as amended, does not place a duty to co-operate with the LEPs and Local Nature Partnerships. Only regard must be had to their activities when preparing local plans, so long as their activities are relevant to plan-making.</p> <p>Paragraph 1.13 states that the Statement of Common Ground (SOC) will be made prepared alongside the version of the Local Plan to be submitted to the Secretary of State. The NPPF states in paragraph 27, “in order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statement of common ground, documentation the cross boundary matters being addressed and progress in co-operating to address these. These should be produced using the approach set out in National Planning Guidance and be made publicly available through the plan-making process to provide transparency.” The National Planning Practice Guidance states that “Authorities should have made a statement of common ground available on their website by the time they publish their draft</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The Localism Act 2011 introduced the Duty to Cooperate. The Town and Country Planning (Local Planning) (England) 2012 outlines the bodies prescribed for the purposes of meeting the legal duty to cooperate. Regulation 4 (2) sets out that Local Enterprise Partnerships should be involved in the DTC. This is outlined in Paragraph 1.11 of the LPP2. Paragraph 27 of the NPPF refers to strategic policies. The Northampton</p>

			<p>plan, in order to provide communities and other Stakeholders with a transparent picture of how they have collaborated".</p> <p>The plan by delaying the SOC, NBC are not demonstrating their statutory duty of co-operation on strategic matters.</p>		<p>LPP2 does not contain strategic policies; strategic policies for Northampton are contained in the Part 1 Local Plan - the West Northamptonshire Joint Core Strategy.</p>
<p><b>Representation reference:</b> 243/1/3</p> <p><b>Name:</b> Lisa Dawson</p>	<p><b>Refers to:</b> para. 1.18</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI - not compliant with duty to cooperate</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Within the 195 page document "Northampton Local Plan Part 2 2011-2029; Proposed Submission - Round 2 June 2020" (page 11) you state that "this is the first stage of the plan preparation process and consultation took place in May/June 2016. The public were consulted...."</p> <p>At NO point was any resident of Cosgrove Road and or Cosgrove Way made aware or any proposals to build on the area referred to as "The Green" until the Chronicle &amp; Echo ran an article on the 13th July 2020 inviting residents to review a 200 page document.</p> <p>I would like it noted at this point, that a lot of residents are either elderly and/or disabled and many do not have access to Social Media. I do not think that the Council have met their legal obligation in notifying residents of the proposals.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The Council has undertaken consultations in accordance with the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 as modified. This includes making the documents available for inspection at a principal office and other places (such as libraries) during normal office hours; and published on the local authority website. The Council also advertised each stage of consultation within Local Newspapers.</p>

					Full details of consultation at each stage of the LPP2's progress can be found in the Consultation Statement on the Council's website. The Council have met their full legal obligations regarding publicising the production of the LPP2.
<b>Representation reference:</b> 35/1/2  <b>Name:</b> Historic England	<b>Refers to:</b> para. 2.27	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Sound.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 250/1/19  <b>Name:</b> St Clair Land and Developments LLP Old Bedford Road	<b>Refers to:</b> Policy 14	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> The respondent welcomes the pragmatic approach taken by the Council within Policy 14 and is refreshed to learn of the flexible approach the Council have taken by not prescribing a housing mix based on the outputs of the Strategic Housing Market Assessment. This approach will allow for housing delivery to flexibly respond to changing housing requirements over time.	<b>Suggested changes:</b> However, in regard to self and custom build housing, whilst the requirements for such housing are justified, it is considered that the 3-year period (to allow for the reversion to other forms of housing)	<b>Officer comments:</b> It takes 3 years for a planning permission to be implemented. It is considered reasonable to allow the same time line to be applied to this requirement.

				should be reduced to 1 year to ensure that housing delivery is maintained.	
<p><b>Representation reference:</b> 200/1/16</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Chapter 2</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> By 1st April 2019, 5,727 dwellings had been delivered against 8,157 dwellings in the housing trajectory of the adopted WNJCS resulting in an under-delivery of 2,430 dwellings (see Table 1). The Council cannot demonstrate a 5 YHLS between 2019/20 – 2023/24 against the housing trajectory set out in Appendix 3 of the adopted WNJCS, a 20% buffer for persistent under-delivery and a Sedgefield approach to recouping shortfalls. The 5 YHLS is calculated as only 3.13 years.</p> <p>The Council is proposing the application of a 5% buffer to the 5 YHLS calculation because of its 2019 Housing Delivery Test (HDT) results. The 5 YHLS between 2019/20 – 2023/24 using a 5% buffer and Sedgefield is calculated as 4.5 years. However, the Council should not be complacent in using a 5% buffer because the HDT is measured against the lowest denominator of either household projections or housing requirement.</p> <p>As the Council can still not demonstrate a 5 YHLS (only 4.5 years), a different housing trajectory to that set out in the adopted WNJCS is proposed. The Council proposes using Liverpool rather than Sedgefield approach to recouping shortfalls combined with a stepped trajectory. The stepped trajectory uses actual completions for 2011/12 – 2018/19, baseline of 981 dwellings between 2019/20 – 2023/24 and 1,609 dwellings between 2024/25 – 2028/29. This stepped trajectory backloads the meeting of housing needs. A Liverpool approach without any stepping is 1,295 dwellings per annum. This proposed change of housing trajectory irrespective of the Council's legal opinion is inconsistent with the adopted WNJCS. The use of a Liverpool approach and a stepped housing</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The Northampton Local Plan Part 2 is delivering the WNJCS. The Council's decision to amend the trajectory is in conformity to the adopted JCS. Para 5.40 of the JCS makes reference to the trajectory being updated annually as part of the Annual Monitoring Report. Para 5.41 states that although the trajectory will be reprofiled each year, the delivery will always be compared to the base trajectory. Flexibility exists within the Plan and housing trajectory that allows for development to be brought forward to mitigate the impact</p>

			trajectory represents a double deferral to the delivery of housing needs. This is not just a theoretical mathematical numbers exercise but households in need of homes, it is unacceptable to expect them to be continuously waiting until later in the plan period before their current housing needs are addressed. If the Council cannot demonstrate a 5 YHLS on adoption of the LPP2 and maintain a 5 YHLS throughout the remainder of the plan period then the LPP2 is unsound.		of delays on individual sites.
<b>Representation reference:</b> 200/1/5  <b>Name:</b> HBF	<b>Refers to:</b> Chapter 2 and general	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> WN is also now included within the Oxford – Milton Keynes – Cambridge Growth Arc, where a significant uplift in the delivery of new homes is envisaged by 2050. The Council should recognise economic benefits of such growth. The Economic Footprint of House Building in England & Wales Report commissioned by HBF estimates for every one additional house built, the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27,754 towards affordable housing, £806 towards education, £297 towards open space / leisure, £1,129 extra in Council tax and £26,339 spent in local shops.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The Oxford to Cambridge Arc, and Northampton's place within the Arc is referenced throughout the LPP2.
<b>Representation reference:</b> 35/1/3  <b>Name:</b> Historic England	<b>Refers to:</b> Chapter 2	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> The respondent considered some elements of the plan to be sound, but not others. Recommendations were provided to improve the effectiveness of the plan. On this basis, it was considered that the respondent considers the plan to be unsound because it is not effective.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 248/1/3  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> para. 2.58	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective	<b>Comments:</b> It is extremely welcome to see a council considering new rail destinations, so often councils limit themselves to meekly asking for a couple of extra services on existing routes, so to see new destinations being both considered and route for them protected is extremely welcome.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<b>Representation reference:</b> 248/1/5  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> para. 2.60	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective	<b>Comments:</b> 2.60 - It is also encouraging that the council is actively supporting the EEH projects to identify & provide these new destinations, which makes it disappointing that the most important corridor to satisfy the connectivity gaps identified by EEH (towards Wellingborough) is not on the maps in the local plan despite being mentioned in the supporting text.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> This was omitted in error. This is being recommended for inclusion in Policy 34 and the Policies Map as part of the minor modifications.
<b>Representation reference:</b> 248/1/6  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> para. 2.60	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective	<b>Comments:</b> The EEH project has not progressed as far as identifying potential alignments - so we have, as detailed in this report. (pages 22-28) For this reason we suggest that the “Brackmills” corridor is in fact significantly more important to protect than Market Harborough. At a regional level a Leicester-Rugby connection may offer the same strategic benefits to Northampton (better access to East Midlands Airport & Leicester), alongside local freight benefits at Lutterworth, and be a higher priority option than a Northampton-Market Harborough connection, which would allow it's preservation in the current leisure use format for future use, which in turn makes protection of both “Brackmills” corridors even more crucial.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> This was an omission. Modify the Policies Map accordingly.
<b>Representation reference:</b> 97/1/22  <b>Name:</b> Clayson Country Homes	<b>Refers to:</b> Chapter 3 and Vision	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In conclusion, whilst it is considered that whilst the document would benefit from revisions as set out above, the document does present a plan led approach to meeting those issues which are faced within the Borough. Given the acute housing needs issues faced in the area in recent years, it is considered that the emerging development plan document provides a positive vision and outlines a bold approach and framework to meeting both housing needs and other economic, social and environmental priorities.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<p><b>Representation reference:</b> 148/1/8</p> <p><b>Name:</b> St Clair Land and Developments LLP</p>	<p><b>Refers to:</b> Chapter 3 and Vision</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> It is key to the success of the LPP2 that the DPD helps to deliver the priorities set out in the Northampton Economic Growth Strategy 2020-2025 which was published in May 2020. The documents vision correctly identifies that by the end of the plan period Northampton will be the heart of West Northamptonshire and play a key role in the Oxford-Cambridge Arc Corridor. To this end, the respondents site will assist in the realisation of this vision.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 195/1/5</p> <p><b>Name:</b> Mr B Cheer</p>	<p><b>Refers to:</b> Chapter 3 and Vision</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Therefore, the emerging LPP2 is required to be pragmatic in its response to housing needs and should serve to significantly boost supply as required by the content of the National Planning Policy Framework. To this end, the client welcomes the reference to housing delivery within the proposed vision on Page 32 and the accompanying strategic objectives, particularly Objective 2.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 148/1/9</p> <p><b>Name:</b> St Clair Land and Developments LLP</p>	<p><b>Refers to:</b> Objective 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> The objectives set out within the document are supported, particularly Objective 4 which seeks to capitalise on existing economic contributors and to strengthen and diversify the economy through taking advantage of Northampton's internationally well- placed location. The respondent's site is key to this objective in its proximity to the A45 and M1.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 250/1/7</p> <p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>	<p><b>Refers to:</b> Objective 2</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> The emerging LPP2 is required to be pragmatic in its response to housing needs and should serve to significantly boost supply as required by the content of the National Planning Policy Framework. To this end, the client welcomes the reference to housing delivery within the proposed vision on Page 32 and the accompanying strategic objectives, particularly Objective 2.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

<p><b>Representation reference:</b> 97/1/5</p> <p><b>Name:</b> Clayson Country Homes</p>	<p><b>Refers to:</b> Objective 2</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> Therefore, the emerging LPP2 is required to be pragmatic in its response to housing needs and should serve to significantly boost supply as required by the content of the National Planning Policy Framework. To this end, the client welcomes the reference to housing delivery within the proposed vision on Page 32 and the accompanying strategic objectives, particularly Objective 2.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 62/1/3</p> <p><b>Name:</b> Northamptonshire County Council / North Northants JPU</p>	<p><b>Refers to:</b> para. 3.3 and Objective 8</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> Strategic objective 8 Firstly, we welcome the fact that health and wellbeing are explicitly recognised within the Local Plan Part 2, integral as they are to creating sustainable communities. Specifically, we support the inclusion of strategic objective 8 – Public Health. We welcome the fact that the important role of planning in supporting health and wellbeing is acknowledged, both from the perspective of creating new development that supports healthy and active lifestyles as well as the importance of securing appropriate infrastructure through the planning process to support the provision of appropriate and accessible local health services. This is very much in line with the increased focus on health and wellbeing within the National Planning Policy Framework, notably the sections referred to below: 8. Promoting healthy and safe communities 91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>



			<p>92. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> <p>b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;</p> <p>and Planning Guidance relating to Health and Wellbeing:  <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p>		
<p><b>Representation reference:</b> 35/1/4</p> <p><b>Name:</b> Historic England</p>	<p><b>Refers to:</b> Objective 6</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Sound and welcomed.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 97/1/6</p> <p><b>Name:</b> Clayson Country Homes</p>	<p><b>Refers to:</b> Policy 1</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In response to the content of Policy 1 of the LPP2, it is considered that this policy could be suitably revised and amended to remove any repetition of Chapter 5, in particular Para 11, of the NPPF.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 1 sets out the presumption in favour of sustainable development in line with the NPPF and the West Northamptonshire Joint Core Strategy, as well as for the remainder of the LPP2. No modification required.</p>
<p><b>Representation reference:</b> 123/1/3</p> <p><b>Name:</b> Henry Martin Ltd</p>	<p><b>Refers to:</b> Policy 1</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> Policy 1 - Presumption in Favour of Sustainable Development This policy is welcomed because will enable sustainable development to come forward in the Borough over the plan period. It will also ensure that decision-makers adopt a positive</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

		Plan is unsound: - not effective	and proactive approach towards development proposals as required by paragraphs 11 and 38 of the NPPF and Policy SA of the West Northamptonshire Joint Core Strategy Local Plan (Part 1).		
<b>Representation reference:</b> 148/1/10  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 1	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In response to the content of Policy 1 of the LPP2, it is considered that this policy could be suitably revised and amended to remove any repetition of Chapter 5, in particular Para 11, of the NPPF.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The policy reinforces the message that this presumption in sustainable development is required within this predominantly urban area which is dominated by heritage assets and natural environment.
<b>Representation reference:</b> 195/1/6  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> Policy 1	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In response to the content of Policy 1 of the LPP2, it is considered that this policy could be suitably revised and amended to remove any repetition of Chapter 5, in particular Para 11, of the NPPF.	<b>Suggested changes:</b> Remove the repetition.	<b>Officer comments:</b> The policy reinforces the message that this presumption in sustainable development is required within this predominantly urban area which is dominated by heritage assets and natural environment.
<b>Representation reference:</b> 200/1/29	<b>Refers to:</b> Policy 1	<b>Legal compliance and soundness:</b>	<b>Comments:</b> Policy 1 : Presumption in favour of sustainable development	<b>Suggested changes:</b> This policy is unnecessary	<b>Officer comments:</b> The policy reinforces the

<p><b>Name:</b> HBF</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Policy 1 sets out the presumption in favour of sustainable development. The 2019 NPPF confirms that Local Plans should avoid unnecessary duplication including repetition of policies in the NPPF itself (para 16f). The presumption in favour of sustainable development is clearly set out in the 2019 NPPF (para 11). In attempting to repeat national policy there is a danger that some inconsistencies creep in and lead to small but critical differences between national and local policy causing difficulties in interpretation and relative weighting.</p>	<p>therefore it should be deleted.</p>	<p>message that this presumption in sustainable development is required within this predominantly urban area which is dominated by heritage assets and natural environment.</p>
<p><b>Representation reference:</b> 250/1/8</p> <p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>	<p><b>Refers to:</b> Policy 1</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In response to the content of Policy 1 of the LPP2, it is considered that this policy could be suitably revised and amended to remove any repetition of Chapter 5, in particular Para 11, of the NPPF.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The policy reinforces the message that this presumption in sustainable development is required within this predominantly urban area which is dominated by heritage assets and natural environment.</p>
<p><b>Representation reference:</b> 172/1/19</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> para. 5.28 and Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design expectations, and how these will be tested (NPPF 2019, Paragraph 124).</p>	<p><b>Suggested changes:</b> These should be reworded as follows: POLICY 4 - AMENITY AND LAYOUT Development will be required to create and protect a high standard of</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to the plan will clarify the policy. Modify Policy 4 and para 5.28 to include wording in brackets []. POLICY 4 - AMENITY AND LAYOUT</p>

				<p>amenity for occupiers. In particular new development should ensure:</p> <ul style="list-style-type: none"> <li>• New development is not overbearing upon existing buildings or open spaces</li> <li>• External private or communal garden space, in its extent and design, meets the reasonable needs of its users. The design of new communal garden areas should seek to create spaces that provide opportunities for privacy or seclusion for residents</li> <li>• The outlook and visual amenity afforded from within buildings and private / communal garden areas should be satisfactory taking account of the relationship with</li> </ul>	<p>Development will be required to create and protect a high standard of amenity for occupiers. In particular new development should ensure:</p> <ul style="list-style-type: none"> <li>• New development is not overbearing upon existing buildings or open spaces</li> <li>• External private or communal garden space, in its extent and design, meets the reasonable needs of its users. The design of new communal garden areas should seek to create spaces that provide opportunities for privacy or seclusion for residents</li> <li>• The outlook and visual amenity afforded from within buildings and private / communal garden areas should be satisfactory</li> </ul>
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				<p>neighbouring buildings and the wider street scene, including the design of parking, boundary treatments and landscaping</p> <ul style="list-style-type: none"> <li>• Shared circulation space and routes to private entrances within flatted development should be welcoming, and be naturally lit wherever possible</li> <li>• Provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards, or successor guidance</li> <li>• There is adequate access to both high quality recreational and semi-natural green spaces for all residents</li> </ul>	<p>taking account of the relationship with neighbouring buildings and the wider street scene, including the design of parking, boundary treatments and landscaping</p> <ul style="list-style-type: none"> <li>• Shared circulation space and routes to private entrances within flatted development should be welcoming, and be naturally lit wherever possible</li> <li>• Provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards, or successor guidance</li> <li>• There is adequate access to both high quality recreational and semi-natural green spaces for all residents</li> </ul>
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				<ul style="list-style-type: none"> <li>• Tat [all] developments include high-quality public realm</li> <li>• There are adequate facilities for the storage of bins, including recycling, which are effectively designed for ease of use, access and layout</li> </ul> <p>5.28 Plannig [including through the usage of design tools such as Building for a Healthy Life (BHL)], can assist in creating environments that support and encourage healthy lifestyles and also in identifying and securing facilities needed for the health and care system. Good design can do this through:</p>	<ul style="list-style-type: none"> <li>• hTat [all] developments include high-quality public realm</li> <li>• There are adequate facilities for the storage of bins, including recycling, which are effectively designed for ease of use, access and layout</li> </ul> <p>5.28 Plannig [including through the usage of design tools such as Building for a Healthy Life (BHL)], can assist in creating environments that support and encourage healthy lifestyles and also in identifying and securing facilities needed for the health and care system. Good design can do this through:</p>
<b>Representation reference:</b> 172/1/17	<b>Refers to:</b> para. 5.5	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design	<b>Suggested changes:</b> These should be reworded as follows:	<b>Officer comments:</b> It is agreed that a proposed modification to the

<p><b>Name:</b> Homes England</p>		<p>Soundness: - not specified</p>	<p>expectations, and how these will be tested (NPPF 2019, Paragraph 124).</p>	<p>All development should be well designed and of a high quality, meeting urban design principles outlined in The Design Companion for Planning and Placemaking<sup>15</sup> and National Design Guide<sup>16</sup>. The Council also believes that meeting Building for Life criteria [and the new Building for a Healthy Life (BHL)] helps achieve urban design principles. Building for Life (BfL) [is a design tool designed to help structure discussions about proposed new residential development]. The Council supports use of BfL, [and the updated BHL and successor design tools] as well as other relevant</p>	<p>plan will clarify the paragraph. Amend para 5.5 to include the wording in brackets []. All development should be well designed and of a high quality, meeting urban design principles outlined in The Design Companion for Planning and Placemaking<sup>15</sup> and National Design Guide<sup>16</sup>. The Council also believes that meeting Building for Life criteria [and the new Building for a Healthy Life (BHL)] helps achieve urban design principles. Building for Life (BfL) [is a design tool designed to help structure discussions about proposed new residential development]. The Council supports use of BfL, [and the</p>
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				guidance, including the Design Companion for Planning and Placemaking, National Design Guide and Active Design <sup>17</sup> to help structure pre-application discussions between local communities, the Council and the developer of a proposed scheme.	updated BHL and successor design tools] as well as other relevant guidance, including the Design Companion for Planning and Placemaking, National Design Guide and Active Design <sup>17</sup> to help structure pre-application discussions between local communities, the Council and the developer of a proposed scheme.
<b>Representation reference:</b> 35/1/5  <b>Name:</b> Historic England	<b>Refers to:</b> Policy 2	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Placemaking bullet points 4, 5 and 6 are sound.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 75/1/3  <b>Name:</b> Town Centre Conservation Area Advisory Committee	<b>Refers to:</b> Policy 2	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective - not consistent with national policy	<b>Comments:</b> Policy 2 Placemaking (pp38) Beyond responding to and enhancing the historic environment, there is a need to restore where it has been lost or damaged and maintain what is left.	<b>Suggested changes:</b> Amend this bullet point to: “Maintaining and where necessary restoring, as well as responding to and enhancing locally distinct townscape, landscape and	<b>Officer comments:</b> The NPPF seeks to conserve and enhance the historic environment which includes designated and non-designated assets and their settings. Policy 31 of the LPP2 sets out



				historic environment characteristics".	the requirements on how to achieve this. No modification required.
<b>Representation reference:</b> 97/1/7  <b>Name:</b> Clayson Country Homes	<b>Refers to:</b> Policy 2	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Similarly, in terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The contents of Policies 2 and 3 contain elements specific to Northampton Borough and build on the NPPF. No modification required.
<b>Representation reference:</b> 97/1/9  <b>Name:</b> Clayson Country Homes	<b>Refers to:</b> Policy 2	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The preparation of SPDs is, by virtue of regulations, required to be linked to a policy. It is not considered necessary to provide a link to any future SPDs particularly as there is no guarantee that those SPDs will be prepared.
<b>Representation reference:</b> 148/1/11  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 2	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> in terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The policy has been formulated to provide interpretation of the NPPF for application at the local level.

<b>Representation reference:</b> 148/1/13  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 2	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need to mention this in a policy.
<b>Representation reference:</b> 172/1/12  <b>Name:</b> Homes England	<b>Refers to:</b> Policy 2	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Soundness: - not specified	<b>Comments:</b> Homes England's Strategic Plan commits the Agency to improving design quality including through the use of Building for Life 12 (BfL12; now Building for a Healthy Life, see below) and other tools. Homes England welcomes the references to design quality and the opportunities to deliver quality design in Policies 2,3,4,6 & 7.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 195/1/7  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> Policy 2	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Similarly, in terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.	<b>Suggested changes:</b> Remove repetitions.	<b>Officer comments:</b> The policy has been formulated to provide interpretation of the NPPF for application at the local level.
<b>Representation reference:</b> 195/1/9  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> Policy 2	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.	<b>Suggested changes:</b> Provide reference to future SPDs in policy 2.	<b>Officer comments:</b> SPDs by their very nature can be prepared to provide details on the implementation of the policy. There is no need for SPDs to be referenced in a policy.

<p><b>Representation reference:</b> 229/1/4</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 2</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The policy refers to “easily accessible”, but is not explicit in what is meant by “ease”. Does this relate to the time taken to access these facilities? Safe? Convenient? The NPPF provides more context to the term “ease”. Paragraph 91 (a) of the NPPF states that “Planning Policies and decisions should aim to achieve healthy, inclusive and safe places which, for example, through mixed use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods”. The policy does not refer to the need to provide safe and accessible healthy communities as referenced in paragraph 91 (b) of the NPPF. The policy by virtue of its lack of explicitly in terms of the word ease and there being no reference made to the need to provide safe and accessible health communities, is therefore not consistent with national policy,</p>	<p><b>Suggested changes:</b> Incorporate a mix of accessible facilities, through street layouts that allow for easy, safe pedestrian and cycle connections for day to day living... or providing easy, safe, and pedestrian and cycle connections through street layouts to those facilities nearby.</p>	<p><b>Officer comments:</b> The Northampton LPP2 does not need to replicate what is in the National Planning Policy Framework. No modification required.</p>
<p><b>Representation reference:</b> 250/1/9</p> <p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>	<p><b>Refers to:</b> Policy 2</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The policy has been formulated to provide interpretation of the NPPF for application at the local level.</p>
<p><b>Representation reference:</b> 250/1/11</p> <p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>	<p><b>Refers to:</b> Policy 2</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD’s which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need for this to</p>

			overall aims and objectives for the Borough over the life of the plan.		be mentioned in a policy.
<b>Representation reference:</b> 60/1/3  <b>Name:</b> Northamptonshire Police	<b>Refers to:</b> Policy 3	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> I am pleased to note the reference to security and crime prevention in Policy 3 Design.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 75/1/4  <b>Name:</b> Town Centre Conservation Area Advisory Committee	<b>Refers to:</b> Policy 3	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective - not consistent with national policy	<b>Comments:</b> A healthy design should include access to nature and natural environments, and taking the opportunity to create natural environments. This is important not only in existing natural sites at the edge of the town, but also for improving the lives of people living within the town centre by encouraging nature all around them, and creating green corridors of habitat for wildlife.	<b>Suggested changes:</b> Therefore add a bullet point “Designs should create areas of natural environment which prioritise nature, and where allow visual, aural and where possible physical access to people. For small scale sites this may include retaining or creating gardens with soft, permeable surfaces and planting which encourages wildlife, for larger scale sites this may include larger wildlife areas with suitable habitat to encourage nature.”	<b>Officer comments:</b> Policy 27 of the LPP2 requires new developments to sustain and enhance existing, and support the creation of, Northampton's green infrastructure. This includes ensuring green infrastructure assets are protected, managed, maintained and connected. Development proposals will need to demonstrate how they make a positive contribution to projects identified in Northampton Green Infrastructure Plan. Policy 3 requires new developments

				<ul style="list-style-type: none"> <li>- Add a bullet point "Materials and design should respect and respond to the local vernacular."</li> <li>- Add a bullet point "Design codes should be developed for conservation areas"</li> </ul>	to incorporate design coding. Conservation Areas within the borough are guided by Appraisals and Management Plans. Combined with Policy 3 LPP2 it is considered that no modification is necessary to the policy.
<p><b>Representation reference:</b> 75/1/5</p> <p><b>Name:</b> Town Centre Conservation Area Advisory Committee</p>	<b>Refers to:</b> Policy 3	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> When assessing sustainability, the assessment of environmental impact should include construction and loss of 'embodied energy' in existing housing stock.</p>	<p><b>Suggested changes:</b> Amend bullet point to "Should be as sustainable as possible and constructed in a sustainable fashion, including an assessment of the whole-life from site clearance, to building, to maintenance, to demolition."</p>	<p><b>Officer comments:</b> Policy 3 contains the following bullet point: 'Be as sustainable as possible and constructed in a sustainable fashion'. This is considered to cover the point made by the respondent. No modification required.</p>
<p><b>Representation reference:</b> 97/1/8</p> <p><b>Name:</b> Clayson Country Homes</p>	<b>Refers to:</b> Policy 3	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Similarly, in terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The contents of Policies 2 and 3 contain elements specific to Northampton Borough and build on the NPPF. No</p>

					modification required.
<b>Representation reference:</b> 97/1/10  <b>Name:</b> Clayson Country Homes	<b>Refers to:</b> Policy 3	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The preparation of SPDs is, by virtue of regulations, required to be linked to a policy. It is not considered necessary to provide a link to any future SPDs particularly as there is no guarantee that those SPDs will be prepared.
<b>Representation reference:</b> 148/1/12  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 3	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The policy has been formulated to provide interpretation of the NPPF for application at the local level.
<b>Representation reference:</b> 148/1/14  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 3	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need to mention this in a policy.
<b>Representation reference:</b> 172/1/13	<b>Refers to:</b> Policy 3	<b>Legal compliance and soundness:</b>	<b>Comments:</b> Homes England's Strategic Plan commits the Agency to improving design quality including through the use of Building	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<p><b>Name:</b> Homes England</p>		<p>Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>for Life 12 (BfL12; now Building for a Healthy Life, see below) and other tools.</p> <p>Homes England welcomes the references to design quality and the opportunities to deliver quality design in Policies 2,3,4,6 &amp; 7.</p>		
<p><b>Representation reference:</b> 172/1/18</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design expectations, and how these will be tested (NPPF 2019, Paragraph 124).</p>	<p><b>Suggested changes:</b> These should be reworded as follows: POLICY 3 DESIGN To assist in the achievement of good placemaking, new developments should be designed to:</p> <ul style="list-style-type: none"> <li>• Incorporate sustainable design at the beginning of the development process</li> <li>• Ensure safety, security, amenity, accessibility and adaptability</li> <li>• Have full regard to the needs for security and crime prevention, with crime prevention measures</li> </ul>	<p><b>Officer comments:</b> It is agreed that a proposed modification to the plan will clarify the policy. Modify Policy 3 to include the wording in brackets []: To assist in the achievement of good placemaking, new developments should be designed to:</p> <ul style="list-style-type: none"> <li>• Incorporate sustainable design at the beginning of the development process</li> <li>• Ensure safety, security, amenity, accessibility and adaptability</li> <li>• Have full regard to the needs for security and crime prevention, with crime</li> </ul>

				<p>incorporated into the site layout and building design</p> <ul style="list-style-type: none"> <li>• Ensure residents' privacy and adequate levels of sunlight and daylight</li> <li>• Be as sustainable as possible and constructed in a sustainable fashion</li> </ul> <p>* Create legible and permeable street layouts and public spaces with good pedestrian/cycle routes and public transport access, high quality landscaping and street furniture, avoiding a motor vehicle-dominated approach</p> <ul style="list-style-type: none"> <li>• Incorporate green roofs and living walls into the building design where possible</li> <li>• Achieve the Building for Life an [updated Building for a</li> </ul>	<p>prevention measures incorporated into the site layout and building design</p> <ul style="list-style-type: none"> <li>• Ensure residents' privacy and adequate levels of sunlight and daylight</li> <li>• Be as sustainable as possible and constructed in a sustainable fashion</li> </ul> <p>* Create legible and permeable street layouts and public spaces with good pedestrian/cycle routes and public transport access, high quality landscaping and street furniture, avoiding a motor vehicle-dominated approach</p> <ul style="list-style-type: none"> <li>• Incorporate green roofs and living walls into the building design where possible</li> <li>• Achieve the Building for Life an</li> </ul>
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				<p>Healthy Life certification]          Opportunities for the provision of street trees and soft landscaping should be taken and subject to the other criteria of this policy.          Small scale developments (for 10 dwellings or less) including infill, corner plot and backland development, should ensure continuity in the way the buildings enclose and relate to the street. Small scale developments should respect their context.</p>	<p>[updated Building for a Healthy Le]          Opportunities for the provision of street trees and soft landscaping should be taken and subject to the other criteria of this policy.          Small scale developments (for 10 dwellings or less) including infill, corner plot and backland development, should ensure continuity in the way the buildings enclose and relate to the street. Small scale developments should respect their context.</p>
<p><b>Representation reference:</b> 195/1/8</p> <p><b>Name:</b> Mr B Cheer</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> Similarly, in terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The policy has been formulated to provide interpretation of the NPPF for application at the local level.</p>
<p><b>Representation reference:</b> 195/1/10</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some</p>	<p><b>Suggested changes:</b> Provide reference to future SPDs in policy 3.</p>	<p><b>Officer comments:</b> SPDs by their very nature are there to provide details on</p>

<b>Name:</b> Mr B Cheer		Plan is sound.	future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.		the implementation of the policy. There is no need to reference it in the policy itself.
<b>Representation reference:</b> 200/1/30  <b>Name:</b> HBF	<b>Refers to:</b> Policy 3	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Policy 3 : Design Under Policy 3 new developments should be designed to achieve the Building for Life certification. The Council's policy approach to good placemaking should accord with the 2019 NPPF, the latest NPPG and the National Design Guide. The Building for Life 12 (edition 2018) has been replaced by Building for a Healthy Life (edition 2020). The HBF is supportive of the use of best practice guidance, however the use of such guidance should remain voluntary rather than becoming a mandatory policy requirement, which developers are obliged to use as a pre- condition for the Council's support.	<b>Suggested changes:</b> The requirement to achieve Building for Life certification should be deleted.	<b>Officer comments:</b> It is agreed that a modification be proposed to update the plan. Replace Building for Life (edition 2018) with 'Building for a Healthy Life' (Edition 2020).
<b>Representation reference:</b> 229/1/5  <b>Name:</b> Barratt David Wilson Homes	<b>Refers to:</b> Policy 3	<b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> The policy refers to the need to incorporate sustainable design, but this is a vague statement with no reference to within the preceding paragraphs as to what is envisaged for sustainable design. It is not considered necessary to include "be as sustainable as possible and constructed in a sustainable fashion", as the first bullet point of this policy covers these matters. There is no mention of a Supplementary Planning Document (SPD) that will elaborate on the sustainable design requirements. Without an SPD or further elaboration of what is meant by sustainable design, it will prove difficult to cost in site appraisals. This part of the policy is, therefore, not effective.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 5 sets out the requirements that developments will need to meet to achieve sustainable design. No modification required.

<p><b>Representation reference:</b> 229/1/6</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The need for design coding for major Developments (10 or more dwellings or the development is to be carried out on a site area of 0.5ha or more and it is not known how many houses will be generated) as a carte blanche approach would, perhaps, be rather onerous. The requirement for a Design Code for a major Development should be considered on a case by case basis. This part of the policy is therefore not justified.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone a full viability assessment and it concludes that Design requirements (in Policy 3) are not an onerous cost over and above that provided in BCIS. No modification required.</p>
<p><b>Representation reference:</b> 229/1/7</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> There is no acknowledgement in the policy of the ability to consider a site's inherent characteristics that would prohibit the ability to achieve the policy's requirement. Nor is there the ability to consider site viability.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone a viability assessment and it has been concluded that the plan is viable. Each site is therefore expected to meet the requirements of Policy 3. No modification required.</p>
<p><b>Representation reference:</b> 229/1/8</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b></p>	<p><b>Comments:</b></p>	<p><b>Suggested changes:</b> The policy should, therefore, be</p>	<p><b>Officer comments:</b> Amend Policy 3 Replace Building for</p>

<p><b>Name:</b> Barratt David Wilson Homes</p>		<p>Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Whilst a positive element of the design policy is to achieve BFL accreditation, to achieve such accreditation can only be done after the scheme is built.</p>	<p>amended to state that the criteria outlined in “Building for Healthy communities” should be used as a toolkit throughout the planning process to benchmark the design.</p>	<p>Life certification with 'Building for a Healthy Life certification' The Council considers that all developments should meet Building for a Healthy Life criteria. No modification required with regards to criteria being used as a toolkit.</p>
<p><b>Representation reference:</b> 229/1/9</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The definition of small scale development of 10 dwellings or less conflicts with the definition of Major Development as stated in s(2) Part 1 of the Town and Country Planning Development Management Procedure Order 2015. The policy has no justification in requiring a design code for 10 or more dwellings and its not effective in allowing the considering of viability and site inherent characteristics.</p>	<p><b>Suggested changes:</b> Modification - To assist in the achievement of good place making, new Developments should be designed, where the site’s characteristics and site’s viability allows to:-</p> <ul style="list-style-type: none"> <li>• Incorporate sustainable design from the outset (an SPD will be produce in due course)...</li> <li>• Strike out “be as sustainable possible and constructed in a</li> </ul>	<p><b>Officer comments:</b> The definition of major development within the Town and Country Planning Development Management Procedure Order 2015 is 'the provision of dwelling houses where (i) the number of dwelling houses to be provided is 10 or more'. The LPP2 has undergone a viability assessment and the Plan has been found viable.</p>

				<p>sustainable fashion..”</p> <ul style="list-style-type: none"> <li>• Incorporate a Design Code, where required through negotiations between the Council and applicant to ensure consistency of design approach.</li> <li>• To enable the criteria referenced in “Building for Healthy Communities” to be achieved.</li> </ul>	No modification required.
<p><b>Representation reference:</b> 244/1/17</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Bastion support the overall policy approach set out in Policy 3 and consider that the components established are essential to secure high-quality development both on the site and across Northampton. There are, however, two elements of this policy we suggest are reviewed and wording amended to provide a more effective policy and one that is consistent with national policy.</p> <p>The requirement to achieve Building for Life (BfL) Certification – it should be noted that there is no longer a formal accreditation for BfL 12. We suggest that if use of BfL is to be encouraged through Policy 3, it should be articulated as a requirement for a planning application to have regard to and provide a score against the BfL 12 criteria.</p>	<p><b>Suggested changes:</b></p> <ul style="list-style-type: none"> <li>• Achieve the Building for Life Certification Planning Applications should have regard to and provide a score of the proposals against the Building for Life 12 criteria.</li> </ul>	<p><b>Officer comments:</b> It is agreed that Policy 3 needs to be updated to reflect the reference to Building for a Healthy Life. Modify Policy 3 accordingly.</p>
<p><b>Representation reference:</b> 244/1/18</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b></p>	<p><b>Comments:</b> The reference to incorporating Design Coding in major developments to ensure consistency of design approach is not</p>	<p><b>Suggested changes:</b> We recommend that this wording is</p>	<p><b>Officer comments:</b> In order to ensure the quality of new</p>

<p><b>Name:</b> Bastion Group</p>		<p>Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>considered to be sufficiently specific or clear for an effective policy position. Major development as set out in the Plan glossary relates to all developments over 10 homes or over 0.5ha for residential or over 1000m2 of floorspace or 1 hectare for non- residential development. Whilst Bastion support the use and value of Design Coding on large strategic sites, it is not considered necessary on small / medium scale 'major developments', i.e. those below circa 200 homes, especially not for residential developments of between 10 – 100 homes. It is possible that such applications are pursued in detail at the outset and as such full design detail is provided and would be justified and explained through a Design and Access Statement required as part of a planning application.</p>	<p>amended so that it is more precise in its requirements as follows:</p> <ul style="list-style-type: none"> <li>• Incorporate design coding (in the case of major developments) for consistency of design approach</li> </ul> <p>Design Codes should be prepared for all strategic scale major residential or residential led developments (above 200 units).</p>	<p>development in Northampton is kept consistent, design coding for developments of differing sizes is considered necessary.</p>
<p><b>Representation reference:</b> 250/1/10</p> <p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The policy has been formulated to provide interpretation of the NPPF for application at the local level.</p>
<p><b>Representation reference:</b> 250/1/12</p> <p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need to mention it in a policy.</p>

			overall aims and objectives for the Borough over the life of the plan.		
<p><b>Representation reference:</b> 251/1/4</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 3 requires that new developments are required to 'achieve the Building for Life certification'. The Council's policy approach to good placemaking should accord with the NPPF and the latest PPG. The PPG1 confirms that the National Design Guide, which 'sets out the characteristics of well-design places and demonstrates what good design means in practice', should also be read alongside. Firstly, the Building for Life 12 (edition 2018) has since been replaced by Building for a Healthy Life (edition 2020) and therefore its inclusion does not represent the most up-to-date assessment framework; though BHL2 does indeed note that 'as BHL is the new name for Building for Life 12, local authorities can use BHL without having to rewrite existing policy documents.'</p>	<p><b>Suggested changes:</b> Replace Building for Life (edition 2018) with 'Building for a Healthy Life' (Edition 2020).</p>	<p><b>Officer comments:</b> Agreed. Modify the plan and replace Building for Life (edition 2018) with 'Building for a Healthy Life' (Edition 2020).</p>
<p><b>Representation reference:</b> 251/1/5</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 3</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Notwithstanding, whilst the Developers are supportive of the use of best practice guidance, imposing the requirement to achieve Building for Life certification on new developments should remain discretionary rather than becoming a mandatory policy requirement.</p> <p>Indeed, the policy wording does not refer to minimum development thresholds and would therefore appear applicable to all new development. Such a proposed approach does not accord with the PPG3 which advises the following:  'What are assessment frameworks and how can they be used appropriately? Assessment frameworks are a set of criteria against which a design can be assessed. They can cover a range of issues that</p>	<p><b>Suggested changes:</b> In this regard, any minimum development threshold should apply to large scale housing and mixed use developments proposing approximately 500 dwellings or more.</p>	<p><b>Officer comments:</b> Amend Policy 3 Replace Building for Life certification with 'Building for a Healthy Life certification'. The Council considers that all developments should meet Building for a Healthy Life criteria. No modification required.</p>

			<p>are important for securing well-designed places (such as Building for Life 12) or may focus on particular considerations such as climate change or health.</p> <p>Local planning authorities and developers may wish to use assessment frameworks to inform the design and evaluation of proposals, and support discussions with local communities and other interests about the creation of good places. Frameworks are effective when the issues within them are considered in relation to the particular context and character of a local area. Authorities may wish to refer to the use of specific frameworks in their policies or supplementary planning guidance that are most relevant to the vision for their area, although it is important to ensure that they are used in a proportionate way and do not conflict with national or local planning policy.’ [Emphasis added]</p> <p>The Developers consider the requirement to achieve Building for Life certification on all new developments is disproportionate and unjustified, contrary to NPPF Paragraph 35 which considers plans and its policies ‘sound’ provided they are justified.</p> <p>Its inclusion would create the requirement to secure certification/commendation on all new development, with details likely requiring approval at the reserved matters or pre-commencement stage.</p> <p>In this regard, it is noted that BHL Commendations can be applied for on developments which meet the green light criteria contained within BHL, subject only to the BHL Review and its approval<sup>4</sup>.</p> <p>In cases for non-large-scale housing development, such a process adds unnecessary cost and delay to the decision-making process, contrary to NPPF Paragraph 59 which states that land with permission should be developed without</p>		
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			<p>unnecessary delay. In any event, the design of applications for small and medium-scale residential development will already be subject to review by the Council's Urban Design Officer against the requirements draft Policy 2 (Placemaking) and elsewhere in Policy 3. To add another layer of design scrutiny through the requirements of a BHL Review would be unnecessary and burdensome.</p> <p>The requirement to achieve Building for Life certification should be deleted or, alternatively, its wording amended to include a minimum development threshold to align with the objectives and suggested use of assessment frameworks stated within NPPF Paragraph 129:  'Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for Life. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.' [Emphasis added]</p>		
<p><b>Representation reference:</b> 201/1/4</p> <p><b>Name:</b> Persimmon Homes</p>	<p><b>Refers to:</b> para. 5.9</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> The plan's evidence base does not elaborate on this commentary and we would submit that paragraph 5.9 alone is inadequate for demonstrating need for internal space standards in Northampton. For instance, there is no clarity as to the precise size of each of the dwellings in the of the sample used, the locational split of the developments across the Borough and whether this is representative of the planned housing supply, which parts of the NDSS guidance were met</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The Council has prepared an Optional Higher Technical Standards paper (July 2020) which outlines the need to comply with the NDSS.</p>

		- not consistent with national policy	and which were not, or how substantial the shortfall against the NDSS was across the sample. Importantly, the lack of evidence also does not allow consideration of the specific size and tenure of these units that fell short against the NDSS or how this relates to the Council’s preferred housing mix.		
<p><b>Representation reference:</b> 75/1/6</p> <p><b>Name:</b> Town Centre Conservation Area Advisory Committee</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 4 Amenity and layout (pp40-41)</p> <ul style="list-style-type: none"> <li>• We understand that the average life of a house is 90 years, so this demonstrates the importance of high standards and resilience to climate change and catastrophic events such as pandemics.</li> <li>• In the post-COVID era we should be demanding higher standards than minimum set before COVID. Setting standards based on the minimum will only reduce the health and wellbeing of residents.</li> <li>• Setting external amenity spaces to meet the “reasonable needs of its users” is too vague and open to abuse (second bullet point of policy).</li> <li>• Northampton should set its own standards through an updatable SPD, which should never be less than national minimum requirements and can enforce the higher standards that Northampton’s residents deserve. This will be more flexible to incorporate improvements in the future.</li> <li>• The standards should also apply to conversions, not just to new builds, and to HIMOs.</li> </ul>	<p><b>Suggested changes:</b></p> <ul style="list-style-type: none"> <li>- Therefore amend the second bullet point by changing “reasonable needs of its users” to “Northampton SPD standards”.</li> <li>- And amend the fifth bullet point to: “Provision of at least the minimum internal and external space standards and storage areas as set out in the Northampton SPD, for new builds and conversions including HIMOs.”</li> <li>- apply at least the new build space standards to conversions and HiMOS – see also Policy 15 p69-70.</li> </ul>	<p><b>Officer comments:</b> The preparation of SPDs is, by virtue of regulations, required to be linked to a policy. It is not considered necessary to provide a link to any future SPDs particularly as there is no guarantee that those SPDs will be prepared. Policy 3 of the LPP2 requires new developments to achieve Building for Life certification. Policy 4 requires provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards. No modification required.</p>

<p><b>Representation reference:</b> 97/1/11</p> <p><b>Name:</b> Clayson Country Homes</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The preparation of SPDs is, by virtue of regulations, required to be linked to a policy. It is not considered necessary to provide a link to any future SPDs particularly as there is no guarantee that those SPDs will be prepared.</p>
<p><b>Representation reference:</b> 172/1/14</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Soundness: - not specified</p>	<p><b>Comments:</b> Homes England's Strategic Plan commits the Agency to improving design quality including through the use of Building for Life 12 (BfL12; now Building for a Healthy Life, see below) and other tools. Homes England welcomes the references to design quality and the opportunities to deliver quality design in Policies 2,3,4,6 &amp; 7.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 195/1/11</p> <p><b>Name:</b> Mr B Cheer</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.</p>	<p><b>Suggested changes:</b> Provide reference to future SPDs in policy 4.</p>	<p><b>Officer comments:</b> SPDs by their very nature are there to provide details on the implementation of the policy. There is no need to reference it in the policy itself.</p>

<p><b>Representation reference:</b> 200/1/31</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 4 : Amenity &amp; Layout requires that new development should ensure provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards (NDSS) or successor guidance.</p> <p>If the Council wishes to apply the optional NDSS to new build dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f &amp; Footnote 46). Footnote 46 states that “policies may also make use of the NDSS where the need for an internal space standard can be justified”. As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that “where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing” (ID: 56- 020-20150327). Before adopting the NDSS, the Council should provide a local assessment evidencing the case for Northampton.</p> <p>The Council has not demonstrated via its desktop research (para 5.9) any evidence of need for the NDSS. The Council undertook a desktop study of circa 100 developments granted consent between 2015 – 2018, which concluded that 50% met NDSS, therefore there is no systemic problem to resolve. This correlates with the HBF’s own evidence. The HBF is not aware of any evidence that market dwellings not meeting the NDSS have not sold or that those living in these dwellings consider that their housing needs are not met. There is no evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings. The HBF in partnership with National House Building Council (NHBC) undertake an annual independently verified National New</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The NDSS Technical Paper sets out the Council's evidence for adopting optional Nationally Described Space Standards. No modification required.</p>
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			Homes Customer Satisfaction Survey. The 2019 Survey demonstrates that 91% of new home buyers would purchase a new build home again and 89% would recommend their housebuilder to a friend. The results also conclude that 93% of respondents were happy with the internal design of their new home, which does not suggest that significant numbers of new home buyers are looking for different layouts or house sizes to that currently built.		
<b>Representation reference:</b> 200/1/32  <b>Name:</b> HBF	<b>Refers to:</b> Policy 4	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> The NDSS should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as “requiring something because it is essential or very important rather than just desirable”. The identification of a need for the NDSS should identify the harm caused or may be caused in the future. If it had been the Government’s intention that generic statements simply stating in some cases the NDSS had not been met justified adoption of the NDSS then the standard would have been incorporated as mandatory in Building Regulations, which is not the case.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The NDSS Technical Paper sets out the Council’s evidence for adopting optional Nationally Described Space Standards. No modification required.
<b>Representation reference:</b> 200/1/33  <b>Name:</b> HBF	<b>Refers to:</b> Policy 4	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> To test the cumulative impact of policy requirement compliancy, the Council’s viability assessment should be based on NDSS. The Council’s Plan Viability Study by Aspinall Verdi has not properly tested the impacts of introducing the NDSS. The average house sizes tested are not NDSS compliant (see Tables 5-11, 5-12 & 5-13). The Council’s viability assessment should recognise that the requirement for NDSS reduces the number of dwellings per site, therefore the amount of land needed to achieve the same number of dwellings must be increased. The efficient use of land is less because development densities have been decreased. At the same time, infrastructure and other contributions fall on fewer dwellings per site, which may challenge viability, delivery of affordable	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Table 5-3 of the Viability Assessment sets out that the MHCLG NDSS have been used to determine viability of the Plan. No modification required.

			housing and release of land for development by landowners especially in lower / middle value areas and on brownfield sites.		
<b>Representation reference:</b> 200/1/34  <b>Name:</b> HBF	<b>Refers to:</b> Policy 4	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> The impact of adopting NDSS on affordability should also be assessed. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. Over the last two decades housing affordability in the Borough has worsened. In 1997, the median affordability ratio was 3.1, which has more than doubled by increasing to 7.02 in 2019. The Council should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all dwellings will impact on affordability and effect customer choice. The introduction of the NDSS for all dwellings may lead to customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs. A future purchaser needing a 2 bedroomed home may only be able to afford a 2 bed / 3 person dwelling of 70 square metres with one double bedroom and one single bedroom rather than 2 bed / 4 person dwelling of 79 square metres with two double bedrooms. This may lead to the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. Non-NDSS compliant dwellings may be required to ensure that those on lower incomes can afford a property, which meets their bedroom requirements.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The policy has been assessed as being viable.
<b>Representation reference:</b> 200/1/35  <b>Name:</b> HBF	<b>Refers to:</b> Policy 4	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified	<b>Comments:</b> The Council should assess any potential adverse impacts on meeting demand for starter homes / first-time buyers because the greatest impacts are on smaller dwellings, which may affect delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be determined by market affordability at relevant price points of dwellings and maximising absorption rates. An adverse impact on the	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The policy has been assessed as being viable.

		<ul style="list-style-type: none"> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	affordability of starter home / first time buyer products may translate into reduced or slower delivery rates.		
<b>Representation reference:</b> 200/1/36  <b>Name:</b> HBF	<b>Refers to:</b> Policy 4	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<b>Comments:</b> The Council should also consider if additional families, who can no longer afford to buy a NDSS compliant home, will be pushed into affordable housing need. An unintended consequence of the Council's policy approach may be an increased need for affordable housing at the same time as the cumulative impact of compliancy with policy requirements reduces the viability of development and lessens delivery of affordable housing.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The policy has been assessed as being viable.
<b>Representation reference:</b> 200/1/37  <b>Name:</b> HBF	<b>Refers to:</b> Policy 4	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<b>Comments:</b> If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date.  The requirement for NDSS should be deleted. If the NDSS is adopted then the Council should put forward appropriate proposals for transitional arrangements.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> It is considered that the development industry will have sufficient time to comply with the policy requirements and a transitional arrangement is not deemed necessary.
<b>Representation reference:</b> 201/1/3  <b>Name:</b>	<b>Refers to:</b> Policy 4	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> Local planning authorities can require compliance with the Nationally Described Space Standards (NDSS) through the local plan process but the Planning Practice Guidance (PPG) is clear	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The Council has prepared an Optional Higher

Persimmon Homes		<p>Plan is unsound:  - not justified  - not effective  - not consistent with national policy</p>	<p>that the need for the NDSS must be established in the authority area. The PPG refers to three key aspects that should be assessed as part of this:</p> <p>Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes</p> <p>Viability – the impact of adopting the space standard should be considered as part of the plan’s viability assessment with account taken of the impact of potentially larger dwellings on the land supply. Local planning authorities will also need to consider the impact on affordability where a space standard is to be adopted</p> <p>Timing – There may need to be a reasonable transition period following the adoption of a new policy on space standards to enable developers to factor the cost of space standards into future acquisitions.</p> <p>Where demonstrating need is concerned, the only commentary is in paragraph 5.9 of the supporting text to draft Policy 4. This states that  “The Council undertook desktop research of just over 100 housing developments granted planning permission between 2015 and 2018, and concluded that around half of the schemes met most of the guidance set out in the NDSS.”</p>		<p>Technical Standards paper (July 2020) which outlines the need to comply with the NDSS.</p>
<p><b>Representation reference:</b> 201/1/5</p> <p><b>Name:</b>  Persimmon Homes</p>	<p><b>Refers to:</b>  Policy 4</p>	<p><b>Legal compliance and soundness:</b>  Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p><b>Comments:</b>  There is no comprehensive explanation of how viability implications of the NDSS have been tested. We note the following commentary at paragraph 5.18 of the Plan Viability Study (June 2020):</p>	<p><b>Suggested changes:</b>  None specified.</p>	<p><b>Officer comments:</b>  All developments are required to provide at least the minimum internal space standards and</p>



		<ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p>“In devising suitable floor areas to use we have had regard to MHCLG minimum space standards and new build developments coming forward in the borough.”</p> <p>Simply having “had regard” to the NDSS amongst other factors in deciding on the relevant floor areas to use in appraisals is different from assessing the viability, affordability and supply implications of applying these standards to all future forthcoming schemes over the plan period. In discussing draft Policy 4, Appendix 1 to the Plan Viability Study (June 2020) does not reference the NDSS at all and states that the associated costs have been dealt with through “scheme design and allowance for external works.” This is an ambiguous statement and does not give the necessary confidence that NDSS has been properly integrated into the viability modelling. In addition, contrary to the requirements of the PPG, there is no commentary on the impacts of requiring larger dwellings on the future land supply (a significant consideration given the largely urban nature of the authority’s area) nor any qualitative consideration of the corresponding impacts upon affordability.</p>		<p>storage areas as set out in the Nationally Described Space Standards, or successor guidance. This has been tested through the LPP2’s viability assessment and has been found to be achievable. No modification required.</p>
<p><b>Representation reference:</b> 201/1/6</p> <p><b>Name:</b> Persimmon Homes</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:  <ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul> </p>	<p><b>Comments:</b> Finally, no consideration has been given to the desirability or otherwise of a transitional period and we would expect this to be assessed in light of the commentary in the PPG.</p>	<p><b>Suggested changes:</b> Finally, no consideration has been given to the desirability or otherwise of a transitional period and we would expect this to be assessed in light of the commentary in the PPG.</p>	<p><b>Officer comments:</b> The LPP2 is expected to be adopted in the second half of 2021. There is sufficient opportunity for developers to transition into the new policy requirements between now and then.</p>
<p><b>Representation reference:</b> 201/1/7</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b></p>	<p><b>Comments:</b></p>	<p><b>Suggested changes:</b></p>	<p><b>Officer comments:</b></p>

<p><b>Name:</b> Persimmon Homes</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Persimmon therefore OBJECTS to Policy 4 in its current form since it is not justified by proportionate evidence nor is it compliant with national policy.</p>	<p>The part of the policy that requires compliance with the NDSS should be deleted.</p>	<p>The Council has prepared an Optional Higher Technical Standards paper (July 2020) which outlines the need to comply with the NDSS. All developments are required to provide at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards, or successor guidance. This has been tested through the LPP2's viability assessment and has been found to be achievable. No modification required.</p>
<p><b>Representation reference:</b> 229/1/10</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared</p>	<p><b>Comments:</b> Paragraph 127 of the NPPF refers to the need to provide a high standard of amenity for existing and future occupiers with footnote 46 stating that planning policies should make use of the Government's optional technical standards for accessible and adaptable housing, where this would identify a need for such properties. The need for such properties has not been evidenced. Paragraph 5.9 states "The Council undertook desktop research of just over 100 Housing Developments granted planning permission between 2015 and 2018 and concluded that around</p>	<p><b>Suggested changes:</b> Modification A qualitative study needs to be carried out and a more explicit quantitative study needs to be conducted to determine if there is a need for NDSS properties within</p>	<p><b>Officer comments:</b> The LPP2 has undergone a full viability assessment and it concludes that Nationally Described Space Standards as set out as a requirement in Policy 4 can be met.</p>

		<p>- not justified - not effective - not consistent with national policy</p>	<p>half of the schemes met most of the guidance set out in the NDSS". Surveying 100 applications, of which 50% complied with the standards, has not identified a need, based on amenity grounds nor is it explicit as to what constituted meeting an NDSS housetype. To analyse the standard of amenity of the occupants within the Borough, would also take into account a qualitative approach, through surveys of people's opinions as to whether they found their non-NDSS housetype to be of poor amenity.</p> <p>For the policy to be effective it needs to stipulate that the application of NDSS can only be secured through an Outline Permission or Full application. Through QC opinions on sites within Northamptonshire County, that BDW would be happy to share with Northampton Borough Council, the application of NDSS cannot be sought through a Reserved Matters Application, as NDSS does not fall within the definition of Reserved Matters.</p> <p>The NDSS requirements as stated within the policy requires to compliance of both internal floorspce and Storage areas of NDSS. This is inconsistent with the adopted Local plan part 2 for Daventry District Council who only require internal floorspace compliance.</p> <p>Introducing an NDSS criteria, will result in larger houses being built but at what cost to the Council in terms of projected financial S106 obligations? To build to NDSS criteria does not directly recapture cost through a proportionate increase sale price. In turn, this will lead to increased viability studies accompanying applications, to demonstrate that a particular site is not viable with this stipulation.</p> <p>The policy is therefore not been adequately justified as to why NDSS is required and why storage spaces are required and nor is it effective</p>	<p>Northampton Borough. Should such studies conclude that there is a need for such houses, then the policy will need to be modified to specify what exactly is expected rather than using the phase "at least" accordingly:-</p> <ul style="list-style-type: none"> <li>• "Provision of NDSS space standards in so far as ... will be required taking into account the site's viability"</li> </ul>	<p>No modification required.</p>
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<p><b>Representation reference:</b> 250/1/13</p> <p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need to mention this in a policy.</p>
<p><b>Representation reference:</b> 251/1/6</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 4 requires that new development should ensure 'provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards (NDSS) or successor guidance.' Should the Council wish to apply the optional NDSS to new build dwellings, this should be done in accordance with Footnote 46 of NPPF Paragraph 127(f): 'Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.' As set out under Paragraph 31, all policies should be 'underpinned by relevant and up-to-date evidence', and 'should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.' Additionally, the PPG5 sets out: 'Where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Local planning authorities should take account of [need, viability and timing]'</p>	<p><b>Suggested changes:</b> The Developers consider that NDSS should only be introduced on a 'need to have' rather than a 'nice to have' basis: the identification of a need for NDSS should identify the harm caused or may be caused in the future.</p>	<p><b>Officer comments:</b> The NDSS Technical Paper sets out the Council's evidence for adopting optional Nationally Described Space Standards.</p>

			<p>Before adopting the NDSS, the Council should provide a local assessment evidencing the case for Northampton. The Council has not demonstrated any evidence of need for the NDSS via its desktop research<sup>6</sup></p> <p>The Council undertook a desktop research of circa 100 developments granted consent between 2015 and 2018, which concluded that around half of the scheme met most of the guidance set out in NDSS; as such, there is clearly not a systemic problem which requires resolution.</p> <p>The Developers consider that NDSS should only be introduced on a 'need to have' rather than a 'nice to have' basis: the identification of a need for NDSS should identify the harm caused or may be caused in the future.</p>		
<p><b>Representation reference:</b> 251/1/7</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> To test the cumulative impact of policy requirement compliancy, the Council's viability assessment should be based on NDSS, however it would appear the Council's Plan Viability Study (Aspinall Verdi, June 2020) has not properly tested the impacts of introducing NDSS.</p> <p>The average house sizes tested are not NDSS compliant (see Tables 5-11, 5-12 &amp; 5-13). The Council's viability assessment should recognise that the requirement for NDSS decreases site density and, thus, additional land is required in order to achieve the same number of dwellings. It should also recognise that decreased densities results in a less efficient use of land and, at the same time, infrastructure and other contributions fall on fewer dwellings per site, which may challenge viability, delivery of affordable housing and release of land for development by landowners.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Table 5-3 of the Viability Assessment sets out that the MHCLG NDSS have been used to determine viability of the Plan. No modification required.</p>
<p><b>Representation reference:</b> 251/1/8</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> The impact of adopting NDSS on affordability should also be assessed given the direct relationship between unit size, cost, value and affordability. Simply put, an increase in unit size is likely to result in an increase in build costs; in turn this will</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The policy has been assessed as viable.</p>

Duncan Investments Ltd - Site E of Towcester Rd		Plan is unsound: - not justified - not effective - not consistent with national policy	undoubtedly increase the cost of new housing in a Borough where affordability has significantly worsened in the last decade. An inflexible policy approach to NDSS for all dwellings is likely to impact on affordability and have a negative effect on customer choice: the introduction of NDSS for all dwellings may lead to customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs.		
<b>Representation reference:</b> 251/1/9  <b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd	<b>Refers to:</b> Policy 4	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective - not consistent with national policy	<b>Comments:</b> In this regard, the Council has not assessed the potential adverse impact on meeting demand for starter homes or first-time buyers, as outlined by the PPG7: '[...] evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.' The delivery rates on many sites will be driven by market affordability at the relevant price points of dwellings and thus maximising absorption rates. An adverse impact on the affordability of starter home and/or first-time buyer products may translate into reduced or slower delivery rates.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The policy has been assessed as being viable.
<b>Representation reference:</b> 251/1/10  <b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd	<b>Refers to:</b> Policy 4	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective - not consistent with national policy	<b>Comments:</b> Moreover, the Developers note that no assessment has been provided of how many more households will be pushed into affordable housing need as a result of the adoption of the NDSS and the increased costs, as outlined by the PPG8: '[...] the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.'	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The policy has been assessed as viable.

			An unintended consequence of the Council's policy approach may be an increased need for affordable housing at the same time as the cumulative impact of compliancy with policy requirements reduces the viability of development and lessens delivery of affordable housing.		
<p><b>Representation reference:</b> 251/1/11</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 4</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements, as advised by the PPG9: '[...] there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.' Any land acquisitions underpinning residential sites may have been secured prior to any proposed introduction of the NDSS and therefore these sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date. The requirement for NDSS should be deleted or, if adopted, the Council should put forward appropriate proposals for transitional arrangements.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> It is considered that the development industry has sufficient time to implement this policy. Transitional arrangements are not required.</p>
<p><b>Representation reference:</b> 53/1/3</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 5</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Policy 5 Carbon Reduction, Community Energy Networks, Sustainable Design and Construction, and Water Use - SUPPORT Policy 5 refers to residential developments being required to minimise water consumption by meeting the optional requirement of 110 litres/per person/per day. Anglian Water and the Environment Agency and Natural England has issued advice to local planning authorities (copy attached) stating that there is evidence to demonstrate a need for optional water efficiency standard to be applied in the</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			<p>Anglian Water supply area. As such we fully support the inclusion of this standard in the policy.</p> <p>We note that changes have made to refer to water re-use measures in response to comments made by Anglian Water as part of the earlier pre-submission consultation.</p> <p>Opportunities for a more holistic and integrated approach to water management should form part of the plan, to encourage multi-functional water management assets which support other community objectives. This approach combines different elements of water management (e.g. combining SuDS with a water re-use system to both manage runoff and provide an alternative non-potable water supply) together with town planning and design (e.g. integrating the planted SuDS features throughout a development to contribute to 'greener' streetscapes).</p> <p>For the reasons set out above we fully support the reference made to development proposals incorporating water re-use measures wherever possible to reduce demand on existing water supply and impact on existing sewerage infrastructure.</p>		
<p><b>Representation reference:</b> 75/1/7</p> <p><b>Name:</b> Town Centre Conservation Area Advisory Committee</p>	<p><b>Refers to:</b> Policy 5</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Refurbishment of existing building stock should not simply use the same sustainable construction methods as new build, it must allow for different historic construction methods (e.g. dampproof treatments are not the same for solid wall construction) and the need to preserve and enhance character of heritage assets (e.g. replacing windows not appropriate).</p>	<p><b>Suggested changes:</b> Therefore add a bullet point "For the conversion, maintenance and refurbishment of historic and traditional buildings, methods and materials will be appropriate to the age and construction of the building. This is particularly important for</p>	<p><b>Officer comments:</b> Policy 31 of the LPP2 details the requirement to specifically protect designated and non-designated heritage assets. Policy 7 of the LPP2 requires development to incorporate sustainable drainage systems into designs.</p>



				<p>heritage assets (designated and non-designated).”</p> <ul style="list-style-type: none"> <li>- Add a bullet point (all development proposals section): “Incorporate absorbent and natural external surfaces, trees and vegetation to avoid water run-off.”</li> <li>- In accordance with the NPPF paragraph 163c, add a bullet point: “Incorporate sustainable drainage systems, unless there is clear evidence it would be inappropriate”.</li> </ul>	No modification required.
<p><b>Representation reference:</b> 97/1/12</p> <p><b>Name:</b> Clayson Country Homes</p>	<p><b>Refers to:</b> Policy 5</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> The respondent accepts the significant challenge which a changing climate poses and has no significant comments in respect of the content of Policy 5. However, there are concerns over the inclusion of water efficiency standards within the last paragraph of the Policy and in particular Part G2 of the Building Regulations, where this requirement is already covered by legislation it is considered that repetition within Policy 5 is not required and places yet a further burden on Applicants. There are also concerns over how this element of the policy will be monitored.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The Environment Agency has confirmed that the Anglian Water area is an area of water stress. As such measures to ensure reduced water consumption are required to prevent this issue from getting worse. No</p>

					modification required.
<b>Representation reference:</b> 148/1/15  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 4	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need to mention this in a policy.
<b>Representation reference:</b> 148/1/16  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 5	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> The respondent accepts the significant challenge which a changing climate poses and has no significant comments in respect of the content of Policy 5. However, there are concerns over the inclusion of water efficiency standards within the last paragraph of the Policy and in particular Part G2 of the Building Regulations, where this requirement is already covered by legislation it is considered that repetition within Policy 5 is not required and places yet a further burden on Applicants. There are also concerns over how this element of the policy will be monitored.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 195/1/12  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> Policy 5	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> The respondent accepts the significant challenge which a changing climate poses and has no significant comments in respect of the content of Policy 5. However, there are concerns over the inclusion of water efficiency standards within the last paragraph of the Policy and in particular Part G2 of the Building Regulations, where this requirement is already covered by legislation it is considered that repetition within Policy 5 is not required and places yet a further burden on Applicants. There are also concerns over how this element of the policy will be monitored.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 5 seeks to provide policy direction on water efficiency standards for developments within Northampton, in conformity to guidelines. Monitoring details of all policies can be

					found in Chapter 14 of the plan.
<b>Representation reference:</b> 200/1/38  <b>Name:</b> HBF	<b>Refers to:</b> Policy 5	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Policy 5 : Carbon Reduction, Community Energy Networks, Sustainable Design & Construction and Water Use Under Policy 5 planning applications for major development must include a Sustainability Statement setting out their approach to adaptation to climate change and carbon reduction. All development proposals should, where possible, incorporate decentralised energy networks and actively promote energy efficiency and use of renewable energy sources where there is opportunity to do so.  The 2019 NPPF states that policies should be clearly written and unambiguous (para 16). The policy does not provide a clear indication as to how an applicant should prepare a planning application nor how a decision-maker should react to a development proposal.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Details of how to apply for planning permission are on the Planning Portal. No modification required.
<b>Representation reference:</b> 200/1/39  <b>Name:</b> HBF	<b>Refers to:</b> Policy 5	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> The Council has declared a Climate Emergency and is committed to a target of making Northampton carbon neutral by 2030 (paras 2.48 & 5.11). It is the HBF's opinion that the Council's policy approach should reflect the Government's proposals as set out in the Future Homes Standard consultation, which ended on 7th February 2020. The UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. It is the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. The Government's consultation addressed :- <ul style="list-style-type: none"> <li>• options to uplift standards for Part L (Conservation of Fuel &amp; Power) and changes to Part F (Ventilation) Building Regulations</li> </ul>	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The Government's guidance has not yet been finalised.

			<ul style="list-style-type: none"> <li>transitional arrangements to encourage quicker implementation ; and</li> <li>clarifying the role of Councils in setting energy efficiency standards.</li> </ul> <p>The HBF’s response recognises and supports the need to move to The Future Homes Standard but the Government’s preferred Option 2 for a 31% reduction in carbon emissions compared to the current Part L 2013 requirements in 2020 would be difficult and risky to deliver given the immaturity of the supply chain for the production / installation of heat pumps, and the additional load that would be placed on local electricity networks when coupled with Government proposals for the installation of electric vehicle charging points (EVCP) in new homes. The HBF and its Members favour the Government’s Option 1 for a 20% reduction in emissions in 2020 (involving higher fabric efficiency standards than Option 2) and then a further step to Option 2 standards by 2023, which would allow more time for the supply chain to gear up for the scale of demand entailed. The HBF submission argues that “a stepped and incremental approach should be adopted given, in particular, the large requirement for supply chain and infrastructure investment and skills training to support this ambition. The consensus is that Option 1 should be implemented within 2020, with Option 2 being implemented within two to three years in approximately 2023. Our membership sees that transitional arrangements around this implementation should be 18 – 24 months”.</p>		
<b>Representation reference:</b> 200/1/40  <b>Name:</b> HBF	<b>Refers to:</b> Policy 5	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound:	<b>Comments:</b> It is also noted that the Council proposes incorporation of decentralised energy networks. The Council is referred to the Department for Business, Energy and Industrial Strategy consultation on Heat Networks : Building A Market Framework (ended on 1st June 2020). Currently, there are no sector specific protections for heat network consumers, unlike for	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Policy 5 is in conformity to para 151 of the NPPF.

		<ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p>people on other utilities such as gas, electricity or water. Some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. These concerns should be considered by the Council.</p> <p>The Council's viability assessment excludes any costs for Future Homes Standard or the cost of connection to decentralised energy scheme. The Government's consultation estimated Future Homes Standard costs between £2,557 - £4,847 per dwelling.</p>		
<p><b>Representation reference:</b> 200/1/41</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 5</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p><b>Comments:</b> Policy 5 also states that residential development proposals should demonstrate that dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in Building Regulations Part G2. Water reuse &amp; recycling, rainwater &amp; stormwater harvesting and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply.</p> <p>All new dwellings achieve a mandatory level of water efficiency of 125 litres per day per person under Building Regulations, which is higher than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The WMS dated 25th March 2015 confirmed that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG". If the Council wishes to adopt the optional</p>	<p><b>Suggested changes:</b> The requirement for the optional water efficiency standard is unjustified by supporting evidence. This policy requirement should be deleted.</p>	<p><b>Officer comments:</b> The Anglian Water region is particularly vulnerable to the impacts of climate change and is identified as an area of serious water stress. As such the optional requirement of 110 litres / person / day is justified. No modification required.</p>

			standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the NPPG (ID 56-013 to 56-017). The NPPG refers to “helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand” however the Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The Anglian Water company area may be considered an area of water stress but Northampton Borough is only part of this wide area, the Council has provided no evidence that the Borough itself is a water stressed area.		
<b>Representation reference:</b> 229/1/11  <b>Name:</b> Barratt David Wilson Homes	<b>Refers to:</b> Policy 5	<b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> The policy does not distinguish between residential and commercial development. Different types of development maybe able to capture different levels of carbon reduction. Whilst the policy is rather flexible in terms of what is expected in terms of carbon reduction, the ability to achieve carbon reduction can take a number of forms at varying cost. Does the policy envisage the use of a fabric first approach?	<b>Suggested changes:</b> None.	<b>Officer comments:</b> It will be for the applicant to demonstrate how the development meets the requirements of Policy 5, including details on materials. The policy applies to residential and commercial development. No modification required.
<b>Representation reference:</b> 229/1/12  <b>Name:</b>	<b>Refers to:</b> Policy 5	<b>Legal compliance and soundness:</b> Plan is not legally compliant:	<b>Comments:</b> Whilst the policy states “Where possible, incorporate decentralised energy networks” Ofgem rules are written as such that future occupants of buildings should have the freedom to choose their energy suppliers, albeit something	<b>Suggested changes:</b> Ofgem rules are written as such that future occupants of buildings should have the freedom	<b>Officer comments:</b> Paragraph 151 sets out that plans should: c) identify opportunities for development to

Barratt David Wilson Homes		<p>- not compliant with duty to cooperate</p> <p>Plan is unsound:  - not positively prepared  - not justified  - not effective  - not consistent with national policy</p>	that NBC have no control over. It is worth mentioning these regulations.	to choose their energy suppliers, albeit something that NBC have no control over. It is worth mentioning these regulations.	draw its energy supply from decentralised, renewable or low carbon energy supply systems and for colocating potential heat customers and suppliers. No modification required.
<b>Representation reference:</b> 229/1/13  <b>Name:</b> Barratt David Wilson Homes	<b>Refers to:</b> Policy 5	<b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> For the policy to be effective, in its current guise, reference to an SPD is required. The SPD would make explicit what specific detail is required in regard to the issues referenced in the policy and the LPA would be expected to be submitted in a Sustainability Statement. The SPD can also;- <ul style="list-style-type: none"> <li>• refer to any carbon off set fund/off-site provision that would be captured through a S106 obligation</li> <li>• a user friendly toolkit which can calculate carbon reduction</li> <li>• any on-going monitoring of performance</li> <li>• at what stage in planning this can be addressed i.e. not through a Reserved Matters application</li> </ul>	<b>Suggested changes:</b> Modification The policy does not render the plan unsound but only with a supporting SPD which covers in depth, explicitly what is expected to be required in regards to the issues that are to be covered in a Sustainability Statement.	<b>Officer comments:</b> The preparation of SPDs is, by virtue of regulations, required to be linked to a policy. It is not therefore considered necessary to provide a link to any future SPDs.
<b>Representation reference:</b> 234/1/3  <b>Name:</b> Diversified Property Fund For Charities	<b>Refers to:</b> Policy 5	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared	<b>Comments:</b> Whilst it is not believed that this is their intention, the implication of these policies, as presently worded, is that a proposal for the change of use of a unit in excess of 1,000sqm would require the submission of a Sustainability Statement, Health Impact Assessment and Travel Plan. Applied to Grafton Trade Park, this could mean that a straightforward change of use application for one of the larger units (for example, to	<b>Suggested changes:</b> DPFC therefore suggest that these policies are amended to clarify that they apply solely to proposals for new build	<b>Officer comments:</b> It is important that these requirements apply to all developments because they all have impacts on sustainability, health

		<ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p>allow another car rental operator within the Trade Park) would trigger the need for such burdensome documents. Such requirements would appear to be inappropriate and disproportionate for such modest changes of use and ought to be removed.</p> <p>DPFC therefore suggest that these policies are amended to clarify that they apply solely to proposals for new build floorspace over 1,000sqm and not to changes of use of existing floorspace.</p>	<p>floorspace over 1,000sqm and not to changes of use of existing floorspace.</p>	<p>and transport related matters. No modification required.</p>
<p><b>Representation reference:</b> 241/1/6</p> <p><b>Name:</b> British Horse Society</p>	<p><b>Refers to:</b> Policy 5</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> 'Movement and access... walking and cycling' excludes equestrians. Horse riders have access to only 22% of the public rights of way network and carriage drivers to just 5%. Invariably equestrians have to use the road network to access their nearest bridleway or byway and it is important that they are able to do this safely and are provided with safe routes just as walkers and cyclists are. Including equestrians provides even better value for the public purse. Over 90% of equestrians are women and 37% of these are over 45 years of age and over a third would pursue no other physical activity (Church et al, 2010 and NHS,2019). 'Horse riding induces physiologically positive effects such as muscle strength, balance...and psychologically positive changes' (Sung et al, 2015). In the current climate mental health is hugely important and horse riding and carriage driving play a large part in enhancing physical and psychological health therefore should be included in improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel.</p>	<p><b>Suggested changes:</b> In the current climate mental health is hugely important and horse riding and carriage driving play a large part in enhancing physical and psychological health therefore should be included in improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 250/1/14</p>	<p><b>Refers to:</b> Policy 5</p>	<p><b>Legal compliance and soundness:</b></p>	<p><b>Comments:</b> The respondent accepts the significant challenge which a changing climate poses and has no significant comments in</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The Anglian Water region is particularly</p>



<p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>		<p>Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>respect of the content of Policy 5. However, there are concerns over the inclusion of water efficiency standards within the last paragraph of the Policy and in particular Part G2 of the Building Regulations, where this requirement is already covered by legislation it is considered that repetition within Policy 5 is not required and places yet a further burden on Applicants. There are also concerns over how this element of the policy will be monitored</p>		<p>vulnerable to the impacts of climate change and is identified as an area of serious water stress. As such the optional requirement of 110 litres / person / day is justified. No modification required.</p>
<p><b>Representation reference:</b> 251/1/12</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 5</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 5 requires that all development proposals should 'where possible, incorporate decentralised energy networks'. NPPF Paragraph 16 states that policies should be 'clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. The policy does not provide a clear indication as to how and when an applicant should demonstrate that the incorporation of decentralised energy networks is not possible.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Should an applicant not be able to incorporate a decentralised energy network, then evidence should be provided. No modification required.</p>
<p><b>Representation reference:</b> 251/1/13</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 5</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Additionally, the Council's Plan Viability Study (Aspinall Verdi, June 2020) does not include any costs for the provision of, or connection to, decentralised energy schemes. It is noted from the Future Homes Standard consultation that implementing decentralised energy schemes would add between £2,557 - £4,847 to the build-cost per dwelling. The Developers therefore object to the requirements of this policy on the basis of its viability not being tested. Should the Council wish to require the incorporation of decentralised energy networks, it is critical for its viability to be tested in the Study.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The policy has been assessed as viable.</p>

<p><b>Representation reference:</b> 251/1/14</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 5</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 5 also states the following: 'For residential development, proposals should demonstrate that dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in Building Regulations Part G2. Water reuse and recycling and rainwater and stormwater harvesting and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply.'</p> <p>In determining the standard which should be applied to new dwellings, the PPG11 confirms: 'All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.'</p> <p>Should the Council wish to adopt the higher optional standard for water efficiency of 110 litres per person per day, a clear need for this should be established based on the following, as also advised by the PPG:</p> <ul style="list-style-type: none"> <li>• existing sources of evidence.</li> <li>• consultations with the local water and sewerage company, the Environment Agency and catchment partnerships.</li> <li>• consideration of the impact on viability and housing supply of such a requirement.</li> </ul> <p>The Developers acknowledge that the higher optional standard has been tested through the Council's Plan Viability Study (Aspinall Verdi, June 2020) and that Anglian Water were consulted as part of the Draft Proposed Submission Consultation (June 2019). However, Anglian Water's response did not disclose any locally specific evidence to suggest whether Northampton Borough is</p>	<p><b>Suggested changes:</b> The requirement for the higher water efficiency standard is unsound because it is unjustified and inconsistent with national policy. This policy requirement should be deleted.</p>	<p><b>Officer comments:</b> The Anglian Water region is particularly vulnerable to the impacts of climate change and is identified as an area of serious water stress. As such the optional requirement of 110 litres / person / day is justified. No modification required.</p>
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			<p>itself an area of serious water stress; instead, its response outlined:</p> <p>'We understand that the Environment Agency considers that the area served by Anglian Water is an area of serious water stress as defined in the Environment Agency 2013 'Water stressed areas final classification report'. Therefore we would fully support the optional water efficiency standard being applied within the Northampton Local Plan area.' [Emphasis added]</p> <p>Whilst the area served by Anglian Water may be considered an area of water stress, the administrative boundary of Northampton Borough forms only part of this wide area; Anglian Water nor the Council have provided any further evidence which clearly demonstrates that the Borough itself is a water stressed area. This is supported by the PPG12 which confirms:</p> <p>'In addition to these primary data sources, locally specific evidence may also be available, for example collaborative 'water cycle studies' may have been carried out in areas of high growth.'</p>		
<p><b>Representation reference:</b> 241/1/3</p> <p><b>Name:</b> British Horse Society</p>	<p><b>Refers to:</b> para. 5.25</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Paragraph refers to 'walking and cycling'. Horse riding (and carriage driving) are accepted in the Active Travel strategy as healthy activity.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 241/1/4</p> <p><b>Name:</b> British Horse Society</p>	<p><b>Refers to:</b> para. 5.25</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Paragraph refers to leisure spaces, etc however Public Rights of Way are not specifically mentioned.</p>	<p><b>Suggested changes:</b> PRoW must be promoted, expanded and protected for shared user benefit.</p>	<p><b>Officer comments:</b> It is agreed that the plan could be strengthened by making references to public rights of way. Modify Policy 32 accordingly.</p>

<p><b>Representation reference:</b> 241/1/5</p> <p><b>Name:</b> British Horse Society</p>	<p><b>Refers to:</b> para. 5.28</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> 'Movement and access... walking and cycling' excludes equestrians. Horse riders have access to only 22% of the public rights of way network and carriage drivers to just 5%. Invariably equestrians have to use the road network to access their nearest bridleway or byway and it is important that they are able to do this safely and are provided with safe routes just as walkers and cyclists are. Including equestrians provides even better value for the public purse. Over 90% of equestrians are women and 37% of these are over 45 years of age and over a third would pursue no other physical activity (Church et al, 2010 and NHS,2019). 'Horse riding induces physiologically positive effects such as muscle strength, balance...and psychologically positive changes' (Sung et al, 2015). In the current climate mental health is hugely important and horse riding and carriage driving play a large part in enhancing physical and psychological health therefore should be included in improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel.</p>	<p><b>Suggested changes:</b> In the current climate mental health is hugely important and horse riding and carriage driving play a large part in enhancing physical and psychological health therefore should be included in improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 57/1/1</p> <p><b>Name:</b> Hardingstone Parish Council</p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified</p>	<p><b>Comments:</b> Whilst the document mentions the importance of Health and Wellbeing, it is felt that there is little joined up thinking. There is substantial development without the appropriate increases for GP surgeries or whether Northampton General Hospital can cope with the expanding population when both seem to be at breaking point.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The plan has been prepared using updated evidence base and also in consultation with key stakeholders who are responsible for various infrastructure provision including healthcare provision. The Infrastructure</p>

					Delivery Plan 2019 has also been used to update the requirements for infrastructure in Northampton.
<p><b>Representation reference:</b> 62/1/4</p> <p><b>Name:</b> Northamptonshire County Council / North Northants JPU</p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> We fully support the inclusion of Policy 6 on the topic of health and wellbeing. This is clearly in alignment with NPPF and reflects the significant local health and wellbeing challenges in Northampton Borough that have been identified by the partners involved in the Northamptonshire Health and Care Partnership (<a href="https://northamptonshirehcp.co.uk/">https://northamptonshirehcp.co.uk/</a>). If designed correctly, new developments can play a much greater role in supporting health and wellbeing by supporting healthier lives, rather than making them difficult to attain. This is something we definitely need to achieve to address local health and wellbeing challenges in the Borough.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 62/1/5</p> <p><b>Name:</b> Northamptonshire County Council / North Northants JPU</p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Health Impact Assessment The requirement to undertake Health Impact Assessments will be an effective, robust and proportionate way to ensure that planning decisions contribute to these local and national health and wellbeing policy objectives, in accordance with existing guidance. The requirement for health impact assessment will allow / enable:</p> <ul style="list-style-type: none"> <li>• Developers / applicants to systematically identify the health and wellbeing implications of their proposals and therefore whether they are meeting relevant (national and local) planning policy requirements in relation to health and wellbeing.</li> <li>• Make improvements (for example in design / layout) to mitigate any negative health and wellbeing impacts</li> </ul>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			<p>or maximise the positive contributions to health and wellbeing.</p> <ul style="list-style-type: none"> <li>• The planning authority to judge the contribution the development proposals make to health and wellbeing and thus how they meet the health and wellbeing requirements of NPPF and LPP2 Policy 6.</li> <li>• Inform discussion / consideration of the proposals by consultees such as the local Public Health team and Clinical Commissioning Group.</li> </ul> <p>This approach is aligned to the Planning Practice Guidance. The submitted Health Impact Assessment would inform the views / representations of health sector consultees such as the Northamptonshire Director of Public Health and the local clinical commissioning groups. It would do this by identifying any significant impact on the health and wellbeing of the local population or particular groups within it and inform consideration of whether the new development would have a significant or cumulatively significant effect on health infrastructure and/or the demand for healthcare services.</p>		
<p><b>Representation reference:</b> 62/1/8</p> <p><b>Name:</b> Northamptonshire County Council / North Northants JPU</p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Physical activity Very simply, our population is generally not being active enough to maintain good health and wellbeing. The Northamptonshire Physical Activity &amp; Sport Framework – More Active, More Often (<a href="https://www.northamptonshiresport.org/files/59369/northamptonshiremoreactivemoreoften-lowres-mar18.pdf">https://www.northamptonshiresport.org/files/59369/northamptonshiremoreactivemoreoften-lowres-mar18.pdf</a>) notes that we are spending significant amounts of our lives in poor health and one of the most important factors in this is that we are not being physically active enough. Achieving higher levels of active travel is likely to require significant investment in the public realm and walking and cycling infrastructure. Specific aspects that should be addressed include:</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			<ul style="list-style-type: none"> <li>• Way marking – ensuring walking and cycling routes are clear, prominent and easily navigable. You may have good walking / cycling routes but if people cannot easily find where they are going, they are less likely to use them.</li> <li>• Safe and attractive – walking and cycling routes need to be appealing if they are to be used on a mass scale. Safety is a key aspect of this and should be addressed through high quality infrastructure, including cycleways that are segregated from motor vehicle traffic.</li> <li>• Cycle parking – needs to be prominently located, to make it accessible and genuinely appealing to use. This has the added benefit of raising the profile of cycling as a means of travel.</li> <li>• Places to rest / stop – for many people, particularly those with mobility issues, having places to stop and rest will be critical.</li> </ul>		
<p><b>Representation reference:</b> 62/1/9</p> <p><b>Name:</b> Northamptonshire County Council / North Northants JPU</p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Social inclusion Although many people favour travel by car, a significant proportion of the population do not have access to a motor vehicle and therefore a focus on infrastructure for car travel can greatly exacerbate social inequalities. This in turn is not good for community wellbeing or the local economy.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 62/1/10</p> <p><b>Name:</b> Northamptonshire County Council / North Northants JPU</p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Air quality NBC has had several air quality management areas in the town centre for a number of years and I understand is considering amalgamating those into one larger town centre air quality management area. Given the amount of housing growth planned in / adjacent to Northampton and the likely levels of associated car travel, this is likely become even more of an</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The policies contained in the local plan seeks to promote sustainable travel which will contribute towards</p>

			issue. A significant change in approach to sustainable travel is likely to be required to bring air pollution levels below the statutory levels.		a reduction in air pollution levels.
<p><b>Representation reference:</b> 75/1/8</p> <p><b>Name:</b> Town Centre Conservation Area Advisory Committee</p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Providing access to nature improves wellbeing and can also improve health by promoting physical activity. There is a need to both provide new natural environment on site, and to provide routes to natural environment off-site. This is even more important where the development site was previously a natural environment, the development of which removes opportunities for local residents to experience nature.</p>	<p><b>Suggested changes:</b> Therefore add a new bullet point: “Promoting access to the natural environment by both providing new natural environment on site, and providing routes to other natural environments nearby e.g. creation of foot-paths”.</p>	<p><b>Officer comments:</b> Policy 27 of the LPP2 requires new developments to sustain and enhance existing, and support the creation of, Northampton's green infrastructure. This includes ensuring green infrastructure assets are protected, managed, maintained and connected. Additionally, new development will need to demonstrate how it improves connectivity to the Local Level Green Infrastructure network beyond the site boundary. No modification required.</p>
<p><b>Representation reference:</b> 97/1/13</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> In terms of Policy 6, whilst the justification for a rapid health impact assessment to support applications of 10 or more dwellings appears justified and reasonable. It once again places</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> It is a requirement of the NPPF to create places that</p>



Clayson Country Homes		Plan is sound.	further validation burdens on developers at a time when the Government’s overarching intention is to simplify and streamline the planning system to ensure that the economy recovers from the impact of COVID 19. Nonetheless, whilst the need for such an assessment is accepted by the respondent, it is urged that the requirements for such an assessment, the tool for doing so and the specific requirements for such a submission should be clearly signposted within the LPP2.		are safe, inclusive and accessible and which promote health and well-being. As such proposals should demonstrate how they meet the policies with the NPPF using guidelines set out in Planning Practice Guidance.
<p><b>Representation reference:</b> 113/1/20</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<b>Refers to:</b> Policy 6	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> We do not believe the Plan to be justified by evidence or effective in dealing with Sports pitches and amenity space, specifically in relation to the following policies: Policy 6 – Health and Wellbeing, Policy 23 – Sports facilities, and playing pitches Policy 28 – Providing open space East Hunsbury is an area without sports pitches and future developments should be required to make provision for community access. There are many in our community who are, or have been, members of Welland Valley Football Club over the years, and the parish council are concerned that the location of the football pitches (off of Ladybridge Drive (Wootton Brook) is not classified as Amenity Green Space. The land has been used as pitches for a number of years and is a prime example of an area of land which should be maintained as amenity green space. The Parish Council would expect that any planning application for development of sites within East Hunsbury would include provision of open space, sports and recreation facilities, and suitable measures to ensure the maintenance of these spaces for the future. The use of management companies has created</p>	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The LPP2 seeks to encourage healthy lifestyles through a variety of policies (6, 23 and 28). Policy 23 sets out that development resulting in the loss the loss of existing sports related community facilities, which is well used and valued, will only be acceptable if adequate alternative provision exists. Policy 28 of the LPP2 requires new major development to sustain or enhance open spaces, and

			an unnecessary burden for residents in other areas, and other ways of managing open space should be encouraged.		contribute to open space provision as set out in the standards in Policy 28. It is agreed that there is evidence to suggest that the area in Welland Valley FC (Off Ladybridge Drive) should be designated as Amenity Green Space. Modify the Policies Map accordingly.
<b>Representation reference:</b> 172/1/15  <b>Name:</b> Homes England	<b>Refers to:</b> Policy 6	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Soundness: - not specified	<b>Comments:</b> Homes England's Strategic Plan commits the Agency to improving design quality including through the use of Building for Life 12 (BfL12; now Building for a Healthy Life, see below) and other tools. Homes England welcomes the references to design quality and the opportunities to deliver quality design in Policies 2,3,4,6 & 7.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 172/1/20  <b>Name:</b> Homes England	<b>Refers to:</b> Policy 6	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Soundness: - not specified	<b>Comments:</b> As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design expectations, and how these will be tested (NPPF 2019, Paragraph 124).	<b>Suggested changes:</b> These should be reworded as follows: POLICY 6 - HEALTH AND WELLBEING The health and wellbeing of communities will be maintained and	<b>Officer comments:</b> It is agreed that a proposed modification to the plan will clarify the policy. Modify Policy 6 with to include wording in brackets []- last bullet point:

				<p>improved by requiring development to contribute to creating an age friendly, healthy and equitable living environment through:</p> <ul style="list-style-type: none"> <li>• Creating an inclusive built and natural environment;</li> <li>• Promoting and facilitating active and healthy lifestyles;</li> <li>• Preventing negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality;</li> <li>• Providing access for all to health and social care facilities; and</li> <li>• Promoting access for all to green spaces, sports facilities,</li> </ul>	<p><b>POLICY 6 - HEALTH AND WELLBEING</b>  The health and wellbeing of communities will be maintained and improved by requiring development to contribute to creating an age friendly, healthy and equitable living environment through:</p> <ul style="list-style-type: none"> <li>• Creating an inclusive built and natural environment;</li> <li>• Promoting and facilitating active and healthy lifestyles;</li> <li>• Preventing negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality;</li> <li>• Providing access for all to</li> </ul>
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				play and recreation opportunities in accordance with the Standards set out in this plan and the Open Space, Sport and Recreation Strategy. [ • Use of design tools such as Building for a Healthy Life (BHL)]	health and social care facilities; and • Promoting access for all to green spaces, sports facilities, play and recreation opportunities in accordance with the Standards set out in this plan and the Open Space, Sport and Recreation Strategy. [ • Use of design tools such as Building for a Healthy Life (BHL)]
<b>Representation reference:</b> 195/1/13  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> Policy 6	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In terms of Policy 6, whilst the justification for a rapid health impact assessment to support applications of 10 or more dwellings appears justified and reasonable. It once again places further validation burdens on developers at a time when the Government's overarching intention is to simplify and streamline the planning system to ensure that the economy recovers from the impact of COVID 19. Nonetheless, whilst the need for such an assessment is accepted by the respondent, it is urged that the requirements for such an assessment, the tool for doing so and the specific requirements for such a submission should be clearly signposted within the LPP2.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> A rapid health impact assessment can be carried out using updated templates which can be obtained from the Council or the relevant public health body. It is not considered necessary to include this in the plan. No modification required.
<b>Representation reference:</b> 201/1/8	<b>Refers to:</b> Policy 6	<b>Legal compliance and soundness:</b>	<b>Comments:</b> Draft Policy 6 requires that all residential developments of 10 or more dwellings, or 1,000 or more square metres to be	<b>Suggested changes:</b> For these reasons, we do not consider	<b>Officer comments:</b> Paragraph 91 of the NPPF sets out that

<p><b>Name:</b> Persimmon Homes</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>supported by a rapid Health Impact Assessment (HIA) in order to determine if a more substantial HIA is necessary. Larger developments of 100 dwellings or more will be expected to complete a more “substantial” HIA that must be submitted in support of any relevant planning applications.</p> <p>The purpose of undertaking an HIA, according to paragraph 5.29 of the supporting text, is to enable the identification and assessment of the likely effects that a proposed development will have on the health and wellbeing of the community. However, it is not clear what substantive content the Council will expect HIAs to include or in what format this should be presented. It is similarly unclear what benefit or new information undertaking these assessments will provide over and above the already extensive documentation that must accompany a planning application for major development.</p> <p>Most if not all of the factors mentioned in paragraph 5.28 as influencing healthy lifestyles are already covered by planning, design and access statements; transport statements; and Environment Statements prompted by the draft of policies that already deal with ensuring adequate living conditions, opportunities for sustainable travel and so forth.</p>	<p>that draft Policy 6 insofar as it requires the submission of HIAs is justified. We therefore OBJECT to this requirement and suggest its deletion for soundness.</p>	<p>Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</p> <p>a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or</p>
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					<p>community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. Applicants are expected to research what should be included in a Health Assessment, addressing points</p>
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					raised in the NPPF. No modification required.
<p><b>Representation reference:</b> 229/1/14</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> What justification has been provided to produce a more substantial Health Assessment for 100 dwellings or more and what would this entail?</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Paragraph 91 of the NPPF sets out that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</p>

					<p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</p>
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					Applicants are expected to research what should be included in a Health Assessment, addressing points raised in the NPPF. No modification required.
<p><b>Representation reference:</b> 234/1/4</p> <p><b>Name:</b> Diversified Property Fund For Charities</p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Whilst it is not believed that this is their intention, the implication of these policies, as presently worded, is that a proposal for the change of use of a unit in excess of 1,000sqm would require the submission of a Sustainability Statement, Health Impact Assessment and Travel Plan. Applied to Grafton Trade Park, this could mean that a straightforward change of use application for one of the larger units (for example, to allow another car rental operator within the Trade Park) would trigger the need for such burdensome documents. Such requirements would appear to be inappropriate and disproportionate for such modest changes of use and ought to be removed.</p>	<p><b>Suggested changes:</b> DPFC therefore suggest that these policies are amended to clarify that they apply solely to proposals for new build floorspace over 1,000sqm and not to changes of use of existing floorspace.</p>	<p><b>Officer comments:</b> It is important that these requirements apply to all developments because they all have impacts on sustainability, health and transport related matters. No modification required.</p>
<p><b>Representation reference:</b> 250/1/15</p> <p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In terms of Policy 6, whilst the justification for a rapid health impact assessment to support applications of 10 or more dwellings appears justified and reasonable. It once again places further validation burdens on developers at a time when the Government's overarching intention is to simplify and streamline the planning system to ensure that the economy recovers from the impact of COVID 19. Nonetheless, whilst the need for such an assessment is accepted by the respondent, it is urged that the requirements for such an assessment, the tool for doing so and the specific requirements for such a submission should be clearly signposted within the LPP2.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Paragraph 91 of the NPPF sets out that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including</p>

					<p>opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and</p>
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					<p>continual use of public areas; and  c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. Applicants are expected to research what should be included in a Health Assessment, addressing points raised in the NPPF. No modification required.</p>
<p><b>Representation reference:</b> 251/1/15</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Policy 6</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p><b>Comments:</b> Policy 6 requires the following: ‘All residential developments of 10 or more dwellings, or 1,000 or more square metres will be required to be supported by a rapid health impact assessment in order to determine if a more substantial health impact assessment is necessary. Larger</p>	<p><b>Suggested changes:</b> The Developers strongly disagree with this approach as it creates uncertainty and</p>	<p><b>Officer comments:</b> Paragraph 91 of the NPPF sets out that Planning policies and decisions should aim to</p>

<p>Duncan Investments Ltd - Site E of Towcester Rd</p>		<p>- not justified - not effective - not consistent with national policy</p>	<p>developments, of 100 dwellings or more, will be expected to compete a more substantial health impact assessment to support their application.’</p> <p>The Developers acknowledge the need for health impact assessments as part of applications for residential development, particularly as these enable the identification of the likely effects of a proposed development on the health and wellbeing of the community.</p> <p>The policy justification makes reference to the ‘Rapid Health Impact Assessment tool’ and it is understood this relates to the Northamptonshire Rapid Health Impact Assessment Tool for Planning (August 2019). The Developers agree with this approach as its inclusion creates certainty as to the form of health impact assessment considered acceptable at the determination stage.</p> <p>However, no definition is provided for ‘a more substantial health impact assessment’ nor any criteria set outlining when the need for such an assessment is triggered.</p>	<p>risks the decision-making stage becoming unnecessarily protracted. The Developers propose that this part of the policy is amended as follows (remove words in brackets):</p> <p>‘All residential developments of 10 or more dwellings, or 1,000 or more square metres will be required to be supported by a rapid health impact assessment (in order to determine if a more substantial health impact assessment is necessary). Larger developments, of 100 dwellings or more, will be expected to compete a more substantial health impact assessment to support their application.’</p>	<p>achieve healthy, inclusive and safe places which:</p> <p>a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through</p>
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				<p>The deletion of this element will ensure a consistent policy approach in line with NPPF Paragraph 16 which states that policies should be 'clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'.</p>	<p>the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. Applicants are expected to research what should be included in a Health Assessment, addressing points raised in the NPPF. No modification required.</p>
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<p><b>Representation reference:</b> 53/1/5</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> para. 5.34 and Policy 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> Following the publication of the previous version of the Local Plan there is new water sector guidance relating to the adoption of SuDS where they meet the legal definition of sewers, This is expected to simplify the process for developers applying to Anglian Water to adopt SuDS features.</p>	<p><b>Suggested changes:</b> It is therefore suggested that the related supporting text (para 5.34) is updated to refer to Design and Construction Guidance.</p>	<p><b>Officer comments:</b> It is agreed that the updated guidance should be referred to in the plan. Update paragraph 5.34 to refer to Anglian Water Sustainable Drainage Systems manual or successor documents.</p>
<p><b>Representation reference:</b> 53/1/6</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> para. 5.34</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> We also note that it refers to major development proposals incorporating SuDS into the design and safeguarding access to Anglian Water's existing water and water recycling infrastructure. Policy BN7A of the adopted West Northamptonshire Core Strategy requires the incorporation of SuDS in development wherever practicable. As such it doesn't limit the use of SuDS to major development proposals. Therefore the wording as proposed is inconsistent with the Core Strategy which would be read together with Part 2 Local Plan. It is also important to emphasise that maintaining access to our existing infrastructure is essential for all development proposals and is not limited to major development proposals as suggested.</p>	<p><b>Suggested changes:</b> We would therefore ask that para 5.34 is amended as follows: 'Anglian Water's SuDS adoption handbook and the water sector Design and Construction Guidance sets out the circumstances in which SuDS features will be adopted by Anglian Water'</p>	<p><b>Officer comments:</b> It is agreed that the updated reference should be added to the plan. Amend 5.34 as follows: 'Anglian Water's SuDS adoption handbook and the water sector Design and Construction Guidance sets out the circumstances in which SuDS features will be adopted by Anglian Water'.</p>
<p><b>Representation reference:</b> 172/1/21</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> para. 5.34, 5.35</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design expectations, and how these will be tested (NPPF 2019, Paragraph 124).</p>	<p><b>Suggested changes:</b> Amend to include: 5.33 In addition, NCC has published its Local Standards and Guidance for</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to the plan will clarify the policy. Modify the glossary to include</p>

				<p>Surface Water Drainage in Northamptonshire2</p> <p>1. The guide is a living document, which is updated regularly with new emerging information. The Guide is designed to assist developers in the design of a surface water drainage system in order to meet the required local standards and to support local planning authorities in considering drainage proposals for new developments. Developments are required to consider flood risk, mitigate and where possible reduce flooding. Brownfield sites are required to reduce discharge of surface water from the site by 40%. This betterment is</p>	<p>suggested wording in brackets in para 5.34.</p> <p>Add new paragraph at 5.35.</p> <p>5.34 Anglian Water as sewerage company for the area has also produced surface water management guidance in relation to evidence that applicants will be required to provide to demonstrate compliance with the surface water hierarchy. [Sustainable Drainage Systems, known as SuDS are an alternative way to manage surface water by reducing or delaying rainwater run off. They aim to mimic the way rainfall drains naturally rather than conventional piped methods, which cause problems such as flooding,</p>
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				<p>likely to be increased in the near future to a reduction to greenfield run off rates in line with restrictions placed on discharge of surface water sewers by Anglian Water from brownfield sites into Anglian Water owned surface water sewers.</p> <p>5.34 Anglian Water as sewerage company for the area has also produced surface water management guidance in relation to evidence that applicants will be required to provide to demonstrate compliance with the surface water hierarchy. [Sustainable Drainage Systems, known as SuDS are an alternative way to manage surface water by reducing</p>	<p>pollution or damage to the environment. Anglian Water promote the use of SuDS as a sustainable and natural way of controlling surface water run-off]. Anglian Water's SUDs Adoption handbook sets out the circumstances in which SUDs features would be adopted by Anglian Water. [5.35. SuDS should be multiuse, rather than set aside solely for the purpose of water storage; Building for a Healthy Life states that well-designed multi-functional sustainable drainage will incorporate play and recreational opportunities.]</p>
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				<p>or delaying rainwater run off. They aim to mimic the way rainfall drains naturally rather than conventional piped methods, which cause problems such as flooding, pollution or damage to the environment. Anglian Water promote the use of SuDS as a sustainable and natural way of controlling surface water run-off]. Anglian Water's SUDs Adoption handbook sets out the circumstances in which SUDs features would be adopted by Anglian Water.</p> <p>[5.35 SuDS should be multiuse, rather than set aside solely for the purpose of water storage; Building for a Healthy Life states that well-</p>	
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				designed multi-functional sustainable drainage will incorporate play and recreational opportunities.]	
<p><b>Representation reference:</b> 53/1/4</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> Policy 7 Flood Risk and Water Management - OBJECT (in part) - EFFECTIVE We note that changes have been made to Policy 7 in response to comments made by Anglian Water and Northamptonshire County Councils as LLFA. We welcome reference made to meeting the standards for surface water as set out in documents produced both by the LLFA and Anglian Water following our previous comments on this policy.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 53/1/7</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> We also note that it refers to major development proposals incorporating SuDS into the design and safeguarding access to Anglian Water's existing water and water recycling infrastructure. Policy BN7A of the adopted West Northamptonshire Core Strategy requires the incorporation of SuDS in development wherever practicable. As such it doesn't limit the use of SuDS to major development proposals. Therefore the wording as proposed is inconsistent with the Core Strategy which would be read together with Part 2 Local Plan. It is also important to emphasise that maintaining access to our existing infrastructure is essential for all development proposals and is not limited to major development proposals as suggested.</p>	<p><b>Suggested changes:</b> We would therefore ask that Policy 7 is amended as follows removing wording in brackets: 'For all (major) development'.</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification will strengthen the policy. It is recommended that Policy 7 be modified to remove wording in brackets: 'For all (major) development'.</p>

<p><b>Representation reference:</b> 97/1/14</p> <p><b>Name:</b> Clayson Country Homes</p>	<p><b>Refers to:</b> Policy 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> The discussion of the Borough's housing land supply position, as set out within Chapter 7 is welcomed as is the acknowledgement of the acute housing land supply issues which have arisen over the past 5 years. Allied to this, the Council's acknowledgement in respect of the issues arising from the historic over reliance upon the SUE's around the town is welcomed. The production of the LPP2 will allow for complimentary growth on a range of different sites across the Borough which will serve to compliment, rather than compete with, the delivery of the larger strategic sites.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 97/1/15</p> <p><b>Name:</b> Clayson Country Homes</p>	<p><b>Refers to:</b> Policy 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> It is clear from Call for Sites submissions and the Council's Land Availability Assessment that the development options available within the Borough have been exhaustively considered and that there are no other sources of supply other than those which have been identified for development within the accompanying proposals map.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 113/1/3</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> We do not believe that the plan is justified by evidence or effective in dealing with the cumulative impact of proposed development sites specifically in relation to the following policies: Policy 7 – Flood risk and water management Areas of East Hunsbury have experienced serious flooding events in recent years, and the impact of further development on proposed sites will heighten the risk of further events. Proposed developments should take account of the impact on East Hunsbury as a whole and mitigation measures put in place where required. East Hunsbury Parish Council is working with Northamptonshire County Council on the Pathfinder 3 Project and the outcome of this will need to be considered for planning in the future.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 7 of the LPP2 supports proposals that assist in the management of flood risk and ensure flood risk is not increased elsewhere and provide flood risk reduction / betterment. Sustainable drainage systems must also be incorporated into</p>

					the design of all major development. Policy BN7 of the West Northamptonshire Joint Core Strategy also supports development that complies with the flood risk assessment and management requirements set out in NPPF, the West Northamptonshire Strategic Flood Risk Assessments and the Environment Agency hazard maps. No modification required.
<b>Representation reference:</b> 148/1/22  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Whilst we do not dispute the findings of the Sustainability Appraisal, it is clear that for the purposes of progressing the LPP2 suitable mitigation is built in through the inclusion of Policy 7: Flood Risk and Water Management. Any application for the future development of the site will be supported by technical information to demonstrate that successful flood risk avoidance is possible at the site and that it will not impact upon the deliverability of the site for commercial purposes.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 172/1/16	<b>Refers to:</b> Policy 7	<b>Legal compliance and soundness:</b>	<b>Comments:</b> Homes England's Strategic Plan commits the Agency to improving design quality including through the use of Building	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<p><b>Name:</b> Homes England</p>		<p>Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>for Life 12 (BfL12; now Building for a Healthy Life, see below) and other tools. Homes England welcomes the references to design quality and the opportunities to deliver quality design in Policies 2,3,4,6 &amp; 7.</p>		
<p><b>Representation reference:</b> 172/1/22</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Policy 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design expectations, and how these will be tested (NPPF 2019, Paragraph 124).</p>	<p><b>Suggested changes:</b> These should be reworded as follows: POLICY 7 - FLOOD RISK AND WATER MANAGEMENT Proposals that:</p> <ul style="list-style-type: none"> <li>• assist in the management of flood risk and ensure flood risk is not increased elsewhere and provide flood risk reduction/betterment; and</li> <li>• proposals which comply with relevant guidance for flood risk management and standards for surface water produced by the Lead Local Flood Authority and Anglian Water (or successor</li> </ul>	<p><b>Officer comments:</b> No modification required as addressed in new paragraph 5.35.</p>

				documents) will be supported. For all development: <ul style="list-style-type: none"> <li>Suitable access must be provided and maintained for water supply and drainage infrastructure</li> <li>Sustainable drainage systems must be incorporated into the design [as multi use space]</li> </ul>	
<b>Representation reference:</b> 195/1/14  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> Policy 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> The discussion of the Borough's housing land supply position, as set out within Chapter 7, is welcomed as is the acknowledgement of the acute housing land supply issues which has arisen over the past 5 years. Allied to this, the Council's acknowledgement in respect of the issues arising from the historic over reliance upon the SUE's around the town is welcomed. The production of the LPP2 will allow for complimentary growth on a range of different sites across the Borough which will serve to compliment, rather than compete with, the delivery of the larger strategic sites.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 244/1/19  <b>Name:</b> Bastion Group	<b>Refers to:</b> Policy 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Policy 7 Flood Risk and Water Management Bastion support the policy approach taken to incorporating SuDS into all major development. To ensure that this is consistent with national policy the policy should indicate that SuDS are required unless there is clear evidence to suggest this	<b>Suggested changes:</b> The policy wording should be amended as follows: For all major development:	<b>Officer comments:</b> Policy BN7A of the West Northamptonshire Joint Core Strategy sets out that

			is inappropriate, in accordance with paragraph 163 of the NPPF and Paragraph: 079 Reference ID: 7-079-20150415 of the Planning Practice Guidance (revised 2015). There may be some instances where SuDS are utilised but supplemented by additional drainage measures to achieve the most appropriate drainage strategy for a site.	•Sustainable drainage systems must be incorporated unless there is clear evidence to demonstrate this is not appropriate.	development should use SuDS wherever practicable. No change.
<b>Representation reference:</b> 23/1/5  <b>Name:</b> University of Northampton	<b>Refers to:</b> Policy 10	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective - not consistent with national policy	<b>Comments:</b> Following our comments in relation to the first Proposed Submission Version of the Local Plan in May 2019, we are pleased to see that Policy 10 (Supporting and Safeguarding the University of Northampton Waterside Campus) has been amended to refer to safeguarding the site for education and ancillary uses (previously referred to just education uses). This amendment will ensure that the policy is flexible in the event that any ancillary uses are proposed, such as retail, restaurants or healthcare. The supporting policy text also makes reference to the outline planning permission which includes 35,000 sq. m of commercial floorspace on the south eastern part of the site, which is welcomed.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 30/1/14  <b>Name:</b> Northamptonshire County Council	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI	<b>Comments:</b> In my view elements of the plan do not meet the stated 'principle of engagement in planning' of 'engaging the community and stakeholders in the early stages of plan-making and at subsequent stages'. For example, Site 0657 (Fraser Road) is in the list of proposed allocations. In the 2017 Sites Consultation Paper, this site was indicated as 'not being taken forward for further investigation'. It then appeared as a residential allocation on the policies map for the previous local plan draft submission version consultation. I have no record of either a public or direct consultation from the council regarding changes to the site assessments. For many sites this would not be an issue but in this case the assessment for site LAA0657 states that the site 'is not in proximity to any designated	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> In July 2019, the Government introduced a new set of guidelines in terms of what constitutes a "deliverable" housing site for the purposes of plan making. This meant that the Council was required to review its development

			biodiversity or geodiversity site'. In fact the site is adjacent to Talavera East Potential Wildlife Site and within 1km of other local PWS, and Billing Arbours Local Wildlife Site. These could face increased visitor pressure – and its associated ecological impacts – as a result of residential development. While this might not have rendered site LAA0657 inappropriate for development it does suggest that other sites might have been incorrectly represented in the changes to the site assessments.		plan allocations prior to submitting it to the Planning Inspectorate. The updates were also used to inform the preparation of the Five Year Housing land Supply for 2018/19. Policy 29 of the LPP2 recognises other biodiversity assets and has been strengthened to include reference to Potential Wildlife Sites and that applicants are required to protect or enhance these.
<b>Representation reference:</b> 90/1/1  <b>Name:</b> Friends of Northampton Castle	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> FONC believes that the addition of an Heritage Impact Assessment to the evidence base has benefited the Plan, but that this has not fed through entirely to the overall plan. The aim should be to "define a positive strategy to afford appropriate protection and .. make a positive contribution to local character and distinctiveness" ( Historic Environment Good Practice ) not simply to add warning signs to areas of sensitivity.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The relevant recommendations from the Heritage Impact Assessment have been incorporated into the plan including strengthened policies.
<b>Representation reference:</b> 90/1/2  <b>Name:</b>	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Legal compliance: - not specified	<b>Comments:</b> The lack of a strong strategy for the Historic environment of Northampton is particularly unfortunate in respect of Northampton Castle, where there are contradictory development versus protection and enhancement demands.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The policies contained in the local plan, including those affecting



<p>Friends of Northampton Castle</p>		<p>Soundness: - not specified</p>	<p>The Northampton Forward proposals treat the Castle vicinity as town centre development opportunities, the Neighbourhood Plan for Spring Boroughs treats them as a chance to contribute to local character and distinctiveness. A strategic approach should be taking account of the whole of the Area 1 described in the HIA, including both the heritage assets on the east side of St Andrews Road and the development proposals for the Railway station and yards. There would then be an opportunity to reconcile the contradictions.</p> <p>We would argue therefore that the plan's soundness is undermined by some contradictions and the lack of an overall and effective Historic Environment strategy.</p>		<p>Northampton Castle, have been strengthened following the publication of the Heritage Impact Assessment. Any developments affecting the areas will need to take all the relevant policies into account including the one related to the protection and enhancement of heritage assets (Policy 31).</p>
<p><b>Representation reference:</b> 200/1/6</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Chapter 7 and general</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The WNJCS Inspector's Final Report sets out that each individual Council is responsible for its own HLS measured against the housing trajectory of the WNJCS. As of 2021, Northampton Borough Council will become part of a WN unitary authority together with Daventry District Council and South Northampton District Council. The future LHN figure and 5 YHLS will be calculated singularly for the unitary authority rather than separately and individually for each authority.</p> <p>The Council knowledges that housing delivery from SUEs has been weak resulting in significant housing shortfalls. Since 2011, the NRDA SUEs have not delivered as expected. The latest WNJCS joint monitoring framework demonstrates no 5 YHLS in the NRDA. A large proportion of housing land supply (HLS) in the Borough of Northampton is also located on five SUEs, which have not come forward as expected. The Northampton LPP2 deals only with housing shortfalls from the</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The LPP2 allocates sites within Northampton Borough Council only as it cannot allocate housing sites outside of its jurisdiction. As a part of the development of the West Northamptonshire Strategic Plan, suitable housing sites in West Northamptonshire will be considered.</p>

			<p>five SUEs located in the Borough. There are no proposed compensatory housing allocations for shortfalls across the NRDA even though the WNJCS Inspector’s Final Report sets out that other sites may be part of the response to under-delivery on SUEs (see paras 198 – 200) and the monitoring provisions of adopted WNJCS Policy S6 are engaged. In this context the LPP2 is not complementary to the adopted WNJCS. The LPP2 is not a positive policy response to assisting delivery of the WNJCS and national policy.</p> <p>The WN LPP2s are not meeting housing needs nor significantly boosting housing supply. All WN authorities should be making maximum effort to allocate more housing land. The deferral of meeting housing needs to the WNSP as a review of the adopted WNJCS is unacceptable when LPP2s are capable of meeting identified housing need within the plan period to 2029. The WNSP provides no solution to the immediate and pressing need for housing. The LPP2s cannot abandon their function of delivering the WNJCS to the WNSP, which is already behind schedule. The meeting of shortfalls in delivery of identified housing needs for Northampton should be achieved through the LPP2s by the allocation of housing sites in and / or adjacent to the NRDA and / or in sustainable settlements within close proximity of the NRDA. The LPP2s should be based on effect joint working to deal with unmet needs rather than postponing resolution to a review of the WNJCS. The LPP2 is inconsistent with national policy by failing to meet the minimum housing requirements set out in the adopted WNJCS.</p>		<p>The role of the LPP2s is to deliver the requirements set out in the WNJCS. Policy S3 is clear about the delivery that each partner authorities are expected to deliver. The housing trajectory in the adopted WNJCS is heavily reliant on the delivery of the SUEs, which clearly has not materialised as expected. The decision to address Northampton's shortfall is considered to be in conformity to national guidance. The Council has undertaken an extensive Land Availability Assessment, investigating in excess of 500 sites. In determining whether the site should be allocated,</p>
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					a rigorous methodology was followed. The methodology itself was a subject of consultation in April 2016. In addition, the Council also invited landowners and prospective developers to come forward with their sites for consideration for development. In conclusion, the Council had exhausted every opportunity to identify sites for housing delivery.
<p><b>Representation reference:</b> 200/1/13</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Chapter 7 and 5 Year Housing Land Supply</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The Council's overall HLS should provide some flexibility to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market. The Council's overall proposed HLS is 22,267 dwellings comprising 5,727 completions (between 2011/12 – 2018/19), existing commitments for 4,377 dwellings, a windfall allowance of 2,400 dwellings (300 dwellings per annum), 5,959 dwellings delivered on SUEs and LPP2 housing allocations for 3,804 dwellings (see Table 6). There is an anticipated surplus of 3,394 dwellings (17.9%) between the overall HLS and the housing requirement of 18,870 dwellings. There can be no numerical formula to determine the appropriate quantum for a flexibility contingency but the Council's high dependency on five SUEs</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Northampton Borough Council passed the Housing Delivery Test. Therefore only a 5% buffer is required. The LPP2 allocates housing that exceeds this buffer to build in contingency. No modification required.</p>

			<p>means that greater numerical flexibility is necessary than in cases where HLS is more diversified. There are also other contextual matters to consider including the outdatedness of the strategic policies of the adopted WNJCS, the behind schedule progress of the WNSP, slower than anticipated housing delivery against Northampton's housing requirement on SUEs in the Borough &amp; the NRDA and worsening housing affordability (median household income to median house price ratio of 5.1 in 2009 increasing to 7.02 in 2019). The HBF always suggests as large a contingency as possible (at least 20%), the Council's anticipated surplus is less than 20%.</p> <p>If during the LPP2 Examination, any of the Council's assumptions on lapse rates, windfall allowances and delivery rates are adjusted downwards or any proposed housing site allocations are found unsound then the surplus and any built in flexibility is reduced.</p>		
<p><b>Representation reference:</b> 200/1/14</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Chapter 7 and General - Housing</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. The Council should re-consider the continuing likelihood of 300 dwelling per annum from windfalls where 71 sites for housing development are allocated in the LPP2 and Policy 17 safeguards all existing employment sites.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> There is a criteria in bullet point 2 of Policy 17 that allows for Change of Use. Although not specifically for housing, this is also permitted via Permitted Development.</p>
<p><b>Representation reference:</b> 250/1/16</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> The discussion of the Borough's housing land supply position, as set out within Chapter 7 is welcomed as is the acknowledgement of the acute housing land supply issues which have arisen over the past 5 years. Allied to this, the Council's acknowledgement in respect of the issues arising</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

St Clair Land and Developments LLP Old Bedford Road			from the historic over reliance upon the SUE's around the town is welcomed. The production of the LPP2 will allow for complimentary growth on a range of different sites across the Borough which will serve to compliment, rather than compete with, the delivery of the larger strategic sites.		
<p><b>Representation reference:</b> 251/1/32</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<b>Refers to:</b> Chapter 7	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> However, it is critical that the Council's assumptions on lapse rates, non-implementation allowances, lead-in times and delivery rates contained within its overall supply, five-year housing land supply and housing trajectory are accurate and realistic. In this regard, the Developers would be pleased to provide further information to the Council demonstrating the deliverability of residential development at Site east of Towcester Road. It is acknowledged that the land is affected by topography and will require noise mitigation measures. However, it is considered these constraints can be satisfactory accommodated through the design and layout of the scheme, particularly in the context of noise mitigation, which can be achieved through a 'buffer' to the railway and/or acoustic treatment. An Indicative Concept Masterplan for the site, enclosed at Appendix 1, has been informed by extensive technical analysis. Access is currently achieved from the Towcester Road and there is an existing track under the railway line connecting with land to the east (site ref: LAA1109). Whilst this is not currently suitable for vehicles, it has the potential to provide pedestrian and/or cycle access through to the adjoining land, which would be a significant benefit should the Collingtree SUE be extended west in the future. This would ensure connectivity in this area of Northampton, linking the SUE with the Towcester Road The site is in a sustainable location close to existing properties to the north. A bus stop is located next to the site on the</p>	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted. The consultant refers again to the same matters but also refers to Appendix 1 which is an indicative masterplan.

			Towcester Road providing regular access into Northampton town centre.		
<p><b>Representation reference:</b> 105/1/4</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> para. 7.2</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The Council acknowledge that the aspirational 1,000+ new dwellings expected per annum 2014/15 to 2023/24 has “not materialised” (Local Plan Part 2, paragraph 7.2) and that “delivery of new dwellings at the SUEs has been relatively slow” (op. cit.). These points are illustrated in Table 6 and Graph 1 of the Local Plan Part 2. The Council acknowledge that not all of the dwellings to be delivered by the SUEs, will be completed before 1st April 2029. The Council’s answer to this persistent under-delivery against the WNJCS target is to allocate even more land. The Council’s original housing trajectory was informed by the economic conditions and intelligence at the time it was being progressed. On all reasonable assumptions those conditions and intelligence are now out of date and no longer reliable.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The West Northamptonshire Joint Planning Unit produces a Joint Monitoring Report which considers the rate of house building in Northampton. The NPPF (para 75) states that authorities should prepare an action plan in line with national planning guidance, to assess the causes of underdelivery and identify actions to increase delivery in future years. It has been identified that large, allocated sites are taking longer to build out and as such the LPP2 allocates smaller sites to rectify the historic underdelivery of homes. No</p>

					modification required.
<p><b>Representation reference:</b> 105/1/5</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> para. 7.2</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Based on the foregoing, the Council’s strategy is flawed, being unnecessary and unwarranted. Unnecessary because there is already sufficient land to meet the WNJCS target; unwarranted because the evidence in Northampton over the past shows that the housing trajectory has been over-stated, and overly-aspirational when compared with economic intelligence. This is particularly the case with a larger site, such as The Green, Great Houghton. The Council’s strategy fails to learn from past mistakes, that larger sites (The Green is comparable in size to the smaller Sustainable Urban Extensions) are more difficult to deliver and require considerable new infrastructure. The Green at Great Houghton, by adding to the housing land supply, will create further over-supply, competing with the other larger sites for new households and infrastructure resources. The 2019 Infrastructure Delivery Plan set out that: “5.2 Funding strategic infrastructure remains a challenge. Strategic infrastructure can be delivered in a number of ways, including public sector investment (such as Central Government funding for major projects) private sector development (including developer contributions to public sector projects) and the business plans of statutory undertakers. As Government funding continues to be limited and developer contributions are still often affected by viability issues, at least in the short term, funding strategic infrastructure will remain challenging. Nevertheless, evidence shows that Northamptonshire has experienced a steady recovery following the economic downturn of 2008 and despite the economic uncertainty following the Brexit vote is well placed to thrive.” Add additional large land allocations requiring additional resources, and Covid-19, and this position only gets worse.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The West Northamptonshire Joint Planning Unit produces a Joint Monitoring Report which considers the rate of house building in Northampton. The NPPF (para 75) states that authorities should prepare an action plan in line with national planning guidance, to assess the causes of underdelivery and identify actions to increase delivery in future years. It has been identified that large, allocated sites are taking longer to build out and as such the LPP2 allocates smaller sites to rectify the historic underdelivery of homes.</p>

					Policy 37 of the LPP2 requires development proposals to contribute towards new infrastructure associated with and resulting from the scheme. No modification required.
<b>Representation reference:</b> 105/1/6  <b>Name:</b> Great Houghton Parish Council	<b>Refers to:</b> para. 7.2	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Having said this the Parish Council do acknowledge that given there is such a clear distinction between performance on larger sites (poorer) and smaller sites (better) that Local Plan Part 2 could and should look to offset some of the under-delivery against the WNJCS target by identifying smaller sites.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 105/1/3  <b>Name:</b> Great Houghton Parish Council	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> The Local Part 2 strategy is flawed, it goes beyond meeting Northampton's minimum objectively assessed need (OAN) that is set out in the West Northamptonshire Joint Core Strategy (WNJCS). The WNJCS sets a minimum OAN of 18,870, 2011-2029 (WNJCS Policy S3). The Local Plan Part 2 allocates land for 3,807 new dwellings (Table 6, Local Plan Part 2), of which 3,394 are expected to be delivered over the plan period 2011-2029, 17.98% more than is required. This includes The Green, Great Houghton. This significant oversupply is unnecessary, being unwarranted, not achievable and not sustainable.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The LPP2 plans for a supply of more dwellings than is required by the West Northamptonshire Joint Core Strategy. This is due to building in contingency for previous under-



			<p>Local Plan Part 2 and the Council’s supporting documents (Housing Technical Paper <a href="https://www.northampton.gov.uk/downloads/file/12104/01-housing-technical-paper">https://www.northampton.gov.uk/downloads/file/12104/01-housing-technical-paper</a>; and 5 year Housing Land Supply <a href="https://www.northampton.gov.uk/downloads/file/12108/04-5yhls-nbc-2019">https://www.northampton.gov.uk/downloads/file/12108/04-5yhls-nbc-2019</a>) show a consistent and significant under-performance in delivering the WNJCS minimum target: “By 1st April 2019, 5,727 dwellings had been delivered, against a JCS requirement to allocate sufficient sites (allowing for windfall) to accommodate 8,157 new dwellings in Northampton by that time. The number of dwellings delivered by 1st April 2019 falls some 2,430 units short of the delivery trajectory set out in the JCS (see Table 6).” (Local Plan Part 2, paragraph 7.1).</p>		<p>delivery on the large SUE sites in and around Northampton. Smaller sites are allocated, that will be able to come forward quicker, in case of continued SUE under-delivery. No modification required.</p>
<p><b>Representation reference:</b> 200/1/17</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Chapter 7 and General - Housing</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The LPP2 is unsound because it is inconsistency with the adopted WNJCS by allocating insufficient land and changing the housing trajectory so that housing needs identified in the adopted WNJCS will not be met.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The LPP2 allocates housing that exceeds the required buffer to build in contingency. The Northampton Local Plan Part 2 is delivering the WNJCS. The Council's decision to amend the trajectory is in conformity to the adopted JCS. Para 5.40 of the JCS makes reference to the trajectory being updated annually as part of the Annual Monitoring Report.</p>

					Para 5.41 states that although the trajectory will be reprofiled each year, the delivery will always be compared to the base trajectory. Flexibility exists within the Plan and housing trajectory that allows for development to be brought forward to mitigate the impact of delays on individual sites. No modification required.
<b>Representation reference:</b> 152/1/1  <b>Name:</b> Buddies of Beckets	<b>Refers to:</b> para. 7.11 and Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Loss of natural habitat and established trees - given the pollution levels in this area of town these trees will be contributing to lowering the CO2 levels and to lose them will have a massive impact upon an already over polluted area.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 152/1/2  <b>Name:</b> Buddies of Beckets	<b>Refers to:</b> para. 7.11 and Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Loss of natural boarder to the park, which separates Beckets Park from a petrol station and Morrisons car park - to have even more building around a park in a town	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Site 1134 sits adjacent to Beckett's Park which is designated parks

		Plan is sound.	centre location will mean loss of a valuable green space. It is also well evidenced that people living next to a park often have issues with noise/ASB which will impact upon the council and police having to deal with such complaints.		and gardens. A border to the east of the site is expected to be retained as part of the site's development. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from noise.
<b>Representation reference:</b> 152/1/3  <b>Name:</b> Buddies of Beckets	<b>Refers to:</b> para. 7.11 and Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Increase in traffic in already congested/polluted area.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity

					from poor air quality.
<b>Representation reference:</b> 152/1/4  <b>Name:</b> Buddies of Beckets	<b>Refers to:</b> para. 7.11 and Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Competing access needs with the University and Marina - there is already an issue with competing pedestrians and vehicles in this area and bringing more residents into the area will only increase these demands and cause more tensions.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.
<b>Representation reference:</b> 152/1/5  <b>Name:</b> Buddies of Beckets	<b>Refers to:</b> para. 7.11 and Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Loss of historical interest of the Northampton to Bedford railway line.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated heritage assets. Development will

					need to ensure that proposals demonstrate a clear understanding of the significance of the asset and justify any loss.
<p><b>Representation reference:</b> 152/1/6</p> <p><b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> para. 7.11 and Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon - it does not appear to be the easiest piece of land to access and remove a large quantity of soil and whatever else is underneath from the disused railway. This will have a massive impact upon the park users whilst this work goes on.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone a complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.</p>
<p><b>Representation reference:</b> 152/1/7</p> <p><b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> para. 7.11 and Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: More building on flood risk area reducing ability for water to drain away naturally - on a recognised flood risk area to introduce more concreted area which will not allow water to flow away naturally will increase the risk of flooding.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction</p>

					/ betterment will be supported.
<b>Representation reference:</b> 220/1/1  <b>Name:</b> Kathleen Tomsett	<b>Refers to:</b> para. 7.11 and Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I object to this strip of land being built on because it would require a number of trees being felled. These trees not only soak up pollution from the significant amount of traffic but also provide habitat for birds, squirrels and other wildlife. I walk in the park virtually every day and it is a pleasure to see and hear the birds. The park is an asset and it would be appalling to destroy parts of it like this. There must be other sites locally that housing can be built on without destroying natural habitat.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> A detailed site assessment has been undertaken for all the sites allocated for development. Any proposal that comes forward will need to comply with the relevant policies contained in the plan including Policy 29 (supporting and enhancing biodiversity).
<b>Representation reference:</b> 65/1/13  <b>Name:</b> English Regional Transport Association	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Housing: Since the above housing development(Site no.0333) is close to the main railway line, there should not be any housing development on that site. Moreover this could obliterate old railway track-beds. In any case the housing will encourage more road traffic, and the town's roads are frequently congested.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.
<b>Representation reference:</b> 219/1/1	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b>	<b>Comments:</b> I am not happy about the plan to get rid of the area between beckets park and Morrison's car park.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Northampton is required to deliver

<p><b>Name:</b> Fiona Lungley</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>			<p>18,870 homes by 2029. Sites allocated within the LPP2 have been assessed for their suitability through the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process.</p>
<p><b>Representation reference:</b> 219/1/2</p> <p><b>Name:</b> Fiona Lungley</p>	<p><b>Refers to:</b> para. 7.11</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> My concerns are for possible flooding! Also getting rid of all those well established trees and all that will do to the oxygen levels, pollution levels, the natural habit for wildlife that currently live there.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide</p>

					flood risk reduction / betterment will be supported Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 219/1/3  <b>Name:</b> Fiona Lungley	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> It's a terrible shame for those living in the area not to mention the noise it will create.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity including from noise and poor air quality.
<b>Representation reference:</b> 219/1/4  <b>Name:</b> Fiona Lungley	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> Beckett's park has become quite a sanctuary in recent months for employees in the area especially from the hospital for their lunch breaks etc.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The site that has been allocated sits adjacent to Beckett's Park and will not encroach onto the park.
<b>Representation reference:</b> 219/1/5  <b>Name:</b>	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> I also believe it will negatively effect the wildlife in Beckett's park not to mention the increase in traffic in an already over grown area that's hard to get through at the best of times.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 29 of the LPP2 requires all major development



Fiona Lungley		Plan is unsound: - not justified - not effective			to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats. Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
<b>Representation reference:</b> 219/1/6  <b>Name:</b> Fiona Lungley	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> I believe this is a very under thought plan!	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The LPP2 has been through a thorough process of evidence gathering and consultation stages since 2016 including at Issues, Options and Sites for allocation stages. Responses at all stages of

					consultation have been taken into consideration for the Submission Draft LPP2. The LPP2 also has a supporting evidence base which has informed the policies and allocations within the Plan.
<b>Representation reference:</b> 221/1/1  <b>Name:</b> Sharon Ibrahim	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I have concerns around the following: Loss of natural habitat and established trees.	<b>Suggested changes:</b> None	<b>Officer comments:</b> Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 221/1/2	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b>	<b>Comments:</b>	<b>Suggested changes:</b> None	<b>Officer comments:</b>

<p><b>Name:</b> Sharon Ibrahim</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>I have concerns around the following: Loss of natural boarder to the park, which separates Becketts Park from a petrol station and Morrisons car park.</p>		<p>Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. The site will not encroach onto the park.</p>
<p><b>Representation reference:</b> 221/1/3</p> <p><b>Name:</b> Sharon Ibrahim</p>	<p><b>Refers to:</b> para. 7.11</p>	<p><b>Legal compliance and soundness:</b></p> <p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b></p> <p>I have concerns around the following: Increase in traffic in already congested/polluted area.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b></p> <p>Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.</p> <p>Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity</p>

					from poor air quality.
<b>Representation reference:</b> 221/1/4  <b>Name:</b> Sharon Ibrahim	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I have concerns around the following: Competing access needs with the University and Marina.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
<b>Representation reference:</b> 221/1/5  <b>Name:</b> Sharon Ibrahim	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I have concerns around the following: Loss of historical interest of the Northampton to Bedford railway line.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the significance of the asset and justify any loss.

<p><b>Representation reference:</b> 221/1/6</p> <p><b>Name:</b> Sharon Ibrahim</p>	<p><b>Refers to:</b> para. 7.11</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> I have concerns around the following: How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone a complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.</p>
<p><b>Representation reference:</b> 221/1/7</p> <p><b>Name:</b> Sharon Ibrahim</p>	<p><b>Refers to:</b> para. 7.11</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> I have concerns around the following: More building on flood risk area reducing ability for water to drain away naturally.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported</p>
<p><b>Representation reference:</b> 222/1/1</p> <p><b>Name:</b> Jean Thorne</p>	<p><b>Refers to:</b> para. 7.11</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> The area is a haven for wildlife, I walk my dog twice a day in Becklet's Park, and there is always birdsong or other wildlife to hear and see.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of</p>

		Plan is unsound: - not justified			and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 222/1/2  <b>Name:</b> Jean Thorne	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> Where are the houses/flats going to have access?	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Safe access to the development will need to be demonstrated at the application stage and will need to comply with Policy 33 of the LPP2.
<b>Representation reference:</b> 222/1/3  <b>Name:</b> Jean Thorne	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> There are enough cars going up and down in the park as it is!	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
<b>Representation reference:</b> 222/1/4	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b>	<b>Comments:</b> What about the trees opposite?	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 29 of the LPP2 requires all

<p><b>Name:</b> Jean Thorne</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>			<p>major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.</p>
<p><b>Representation reference:</b> 222/1/5</p> <p><b>Name:</b> Jean Thorne</p>	<p><b>Refers to:</b> para. 7.11</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> What about building on brown sites instead of destroying a small patch of land which gives people pleasure?</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Northampton is required to deliver 18,870 homes by 2029. Sites allocated within the LPP2 have been assessed for their suitability through the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process. Brownfield sites are allocated within the plan but it is also necessary to allocate on greenfield sites to meet housing need.</p>
<p><b>Representation reference:</b> 223/1/1</p> <p><b>Name:</b> Sue Jepson</p>	<p><b>Refers to:</b> para. 7.11</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p><b>Comments:</b> Although this land may not be considered to be a heritage site, it has been part of the Northampton to Bedford railway line which has bordered the park for nearly 150 years. The University, together with (presumably) the Borough Council, have understood the importance of preserving the Engine Shed</p>	<p><b>Suggested changes:</b> None suggested.</p>	<p><b>Officer comments:</b> Policy 31 of the LPP2 requires development to protect and enhance designated</p>

		- not justified	<p>which was part of the this line. I would therefore ask that consideration be given to see the embankment as part of this heritage.</p> <p>As it has been in situ so long, it is now covered in an enormous amount of trees, bushes, greenery and all the wildlife that exists within it. Thankfully the park is a wonderful green space in this otherwise very built up area, and surely this space should stand alongside it in the future. The destruction of so many trees would in itself be a very sad situation.</p>		<p>and non-designated heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the signifiacne of the asset and justify any loss.</p> <p>Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.</p>
<p><b>Representation reference:</b> 223/1/2</p> <p><b>Name:</b> Sue Jepson</p>	<p><b>Refers to:</b> para. 7.11</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> It is also a well known fact that this area of the town has in past years flooded many times. Surely, more building and development in this area is not advisable. Corporations and councils in the past have boasted flood defenses but even the Environment Agency cannot guarantee these will work one hundred per cent. Sadly, the two people who died in the floods close by twenty years ago are testament to this fact.</p>	<p><b>Suggested changes:</b> None suggested.</p>	<p><b>Officer comments:</b> Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction</p>



					/ betterment will be supported
<b>Representation reference:</b> 223/1/3  <b>Name:</b> Sue Jepson	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> Having lived most of my life in the town, I have been sad to see in the past that not nearly enough consideration has been given to the enormous amount of history and heritage this town has to offer. We have lost so many interesting and valued buildings and areas in the past, PLEASE think carefully before any more sites disappear under concrete.	<b>Suggested changes:</b> None suggested.	<b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 248/1/7  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> para. 7.11	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective	<b>Comments:</b> 11.1 Very welcome to see a high level commitment to achieve carbon neutral development by 2030.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 23/1/3  <b>Name:</b> University of Northampton	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective - not consistent with national policy	<b>Comments:</b> The University fully supports allocation of Park and Avenue Campuses for residential redevelopment (allocations 1013 & 1014 respectively) under emerging Policies 13 and 38. The University has now relocated to its new Waterside Campus. The University agrees that residential is the most appropriate and viable future use for the sites. Indeed, Park Campus has outline permission for the development of up to 800 homes and the initial phase is under construction. An application for residential development of Avenue Campus is with the Council for consideration.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 35/1/6	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b>	<b>Comments:</b> Unsound.	<b>Suggested changes:</b>	<b>Officer comments:</b> Noted.

<b>Name:</b> Historic England		Plan is legally compliant.  Plan is unsound: - not effective - not consistent with national policy		Subject to changes recommended in site specific comments.	
<b>Representation reference:</b> 57/1/2  <b>Name:</b> Hardingstone Parish Council	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> There are concerns that due to the location of this site that the only access would be via the village. This would mean an increase of traffic in an area that would not be suitable. There are also concerns that this area would be subject to flooding due to natural springs in the area and the elevation of the land, currently the site takes drainage water from The Green and Heritage Farm. It is the council's understanding that development on this site has been declined in the past due to the sensitive nature of the nearby conservation area.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The site was re-assessed following consultation response to the first round of the Proposed Submission. The site has been assessed for flooding matters and was considered deliverable. Any development will have to conform with flooding policies contained in all relevant development plans and mitigation measures can be considered further when a development proposal comes forward.
<b>Representation reference:</b> 65/1/15	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Legal compliance:	<b>Comments:</b> Housing: Since the above housing development(Site no.0333) is close to the main railway line, there should not be any housing	<b>Suggested changes:</b> None.	<b>Officer comments:</b> This site has been assessed in the Site

<p><b>Name:</b> English Regional Transport Association</p>		<p>- not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>development on that site. Moreover this could obliterate old railway track-beds. In any case the housing will encourage more road traffic, and the town's roads are frequently congested.</p>		<p>Assessment Methodology and Land Availability Assessment (SAMLAA) which includes detailed investigations on matters associated with transport connections and sustainability. All development sites put forward in the Local Plan Part 2 have been modelled to assess their potential transport implications on the impact on the network.</p>
<p><b>Representation reference:</b> 97/1/16</p> <p><b>Name:</b> Clayson Country Homes</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In pointed response to Policy 13, the inclusion of site 1025 (Land to the west of Towcester Road) is welcomed and the content of those earlier submissions in respect of the site remain valid. The site is immediately available, suitable, sustainable, deliverable and viable for residential development purposes and is capable of being delivered within the first 5 years of the plan's adoption.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 97/1/20</p> <p><b>Name:</b> Clayson Country Homes</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Turning to the site-specific allocations and policies which are addressed within Chapter 13, the respondent would first like to commend the bold approach which the Council have sought to adopt in clearly defining the significant number of development sites available within the Borough. It is considered that this approach provides landowners, including</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			those with a legal interest, absolute clarity on the potential future options for the development of their land and property interests.		
<p><b>Representation reference:</b> 105/1/7</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> However, the identification of an additional larger site at The Green, is at the heart of the Council’s flawed strategy. At a time when economic conditions are weaker and resources constrained the Council should be looking to support development on already identified sites, not by unleashing further supply. With its current allocations Local Plan Part 2 seeks to bring forward an additional supply of land of 17.98% against the WNJCS target. This is unnecessary, the Council are already acknowledging persistent under- delivery; unwarranted in that it is not justified by the evidence; and not achievable. 15. The logic is flawed. What other organisation at a time of persistent under- delivery – 2,430 dwellings short of a target of 8,157 (1st April 2019), an under- performance of 29.79% would seek to increase the target by a further 17.98%. This level of over-provision will only lead to further under delivery, sites being allocated unnecessarily and, therefore, not sustainably. A much more measured approach is required, excluding the identification of further large sites and the identification, where possible, of sustainable small and medium sized sites that can be delivered in the short to medium term. In short, the Council are merely repeating past mistakes. On their own evidence larger sites have not achieved what was expected of them. But to make matters worse by allocating almost 25% of the additional housing land at one site The Green. Excluding The Green in favour of smaller sites would still lead to over-provision of 2,594 or 13.75% when compared against WNJCS target.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The NPPF sets out that where there has been a significant under-delivery of housing, a buffer should be applied to maintain the supply of housing. No modification required.</p>
<p><b>Representation reference:</b> 113/1/4</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b></p>	<p><b>Comments:</b> There are 5 proposed sites in East Hunsbury: LAA110, LAA1009, LAA1142, LAA0168 and LAA1102, and a site in West Hunsbury</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone traffic</p>

<p><b>Name:</b> East Hunsbury Parish Council</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>which abuts Towcester Road (LAA1025). N5 (Northampton South SUE) sits across East Hunsbury and Collingtree and has a capacity of 1,000 dwellings, although none have yet been completed. The cumulative impact of the development of these sites, and other approved developments such as the SRFI should be considered.</p> <p>The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic, and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.</p> <p>We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>		<p>modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.</p>
<p><b>Representation reference:</b> 113/1/5</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> There are 5 proposed sites in East Hunsbury: LAA110, LAA1009, LAA1142, LAA0168 and LAA1102, and a site in West Hunsbury which abuts Towcester Road (LAA1025). N5 (Northampton South SUE) sits across East Hunsbury and Collingtree and has a capacity of 1,000 dwellings, although none have yet been completed. The cumulative impact of the development of these sites, and other approved developments such as the SRFI should be considered.</p> <p>The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic,</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of</p>

			<p>and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.</p> <p>We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>		<p>growth. This is outlined in Appendix C.</p> <p>Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.</p>
<p><b>Representation reference:</b> 113/1/6</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> There are 5 proposed sites in East Hunsbury: LAA110, LAA1009, LAA1142, LAA0168 and LAA1102, and a site in West Hunsbury which abuts Towcester Road (LAA1025). N5 (Northampton South SUE) sits across East Hunsbury and Collingtree and has a capacity of 1,000 dwellings, although none have yet been completed. The cumulative impact of the development of these sites, and other approved developments such as the SRFI should be considered.</p> <p>The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic, and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.</p> <p>We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C.</p> <p>Transport Assessments or Statements will be required for development</p>

					proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.
<p><b>Representation reference:</b> 113/1/7</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> There are 5 proposed sites in East Hunsbury: LAA110, LAA1009, LAA1142, LAA0168 and LAA1102, and a site in West Hunsbury which abuts Towcester Road (LAA1025). N5 (Northampton South SUE) sits across East Hunsbury and Collingtree and has a capacity of 1,000 dwellings, although none have yet been completed. The cumulative impact of the development of these sites, and other approved developments such as the SRFI should be considered.</p> <p>The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic, and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.</p> <p>We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to</p>

					sites. No modification required.
<b>Representation reference:</b> 113/1/8  <b>Name:</b> East Hunsbury Parish Council	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> There are 5 proposed sites in East Hunsbury: LAA110, LAA1009, LAA1142, LAA0168 and LAA1102, and a site in West Hunsbury which abuts Towcester Road (LAA1025). N5 (Northampton South SUE) sits across East Hunsbury and Collingtree and has a capacity of 1,000 dwellings, although none have yet been completed. The cumulative impact of the development of these sites, and other approved developments such as the SRFI should be considered. The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic, and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1. We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.
<b>Representation reference:</b> 113/1/9  <b>Name:</b>	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> Local infrastructure, including access to doctors and schools will be impacted by the addition of a further 491 dwellings in the parish (not taking into account the SUE).	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 37 of the LPP2 requires major development proposals to



East Hunsbury Parish Council		Plan is unsound: - not justified - not effective			contribute towards the delivery of and where necessary provide land / suitable sites for any new infrastructure associated with and resulting from the scheme. No modification required.
<b>Representation reference:</b> 113/1/10  <b>Name:</b> East Hunsbury Parish Council	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> Local infrastructure, including access to doctors and schools will be impacted by the addition of a further 491 dwellings in the parish (not taking into account the SUE).	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 37 of the LPP2 requires major development proposals to contribute towards the delivery of and where necessary provide land / suitable sites for any new infrastructure associated with and resulting from the scheme. No modification required.
<b>Representation reference:</b> 113/1/11  <b>Name:</b> East Hunsbury Parish Council	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> Local infrastructure, including access to doctors and schools will be impacted by the addition of a further 491 dwellings in the parish (not taking into account the SUE).	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 37 of the LPP2 requires major development proposals to contribute towards the delivery of and where necessary provide land /

					suitable sites for any new infrastructure associated with and resulting from the scheme. No modification required.
<p><b>Representation reference:</b> 113/1/12</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Local infrastructure, including access to doctors and schools will be impacted by the addition of a further 491 dwellings in the parish (not taking into account the SUE).</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 37 of the LPP2 requires major development proposals to contribute towards the delivery of and where necessary provide land / suitable sites for any new infrastructure associated with and resulting from the scheme. No modification required.</p>
<p><b>Representation reference:</b> 113/1/13</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Local infrastructure, including access to doctors and schools will be impacted by the addition of a further 491 dwellings in the parish (not taking into account the SUE).</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 37 of the LPP2 requires major development proposals to contribute towards the delivery of and where necessary provide land / suitable sites for any new infrastructure associated with and resulting from the</p>

					scheme. No modification required.
<b>Representation reference:</b> 152/1/8  <b>Name:</b> Buddies of Beckets	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Loss of natural habitat and established trees - given the pollution levels in this area of town these trees will be contributing to lowering the CO2 levels and to lose them will have a massive impact upon an already over polluted area.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 152/1/9  <b>Name:</b> Buddies of Beckets	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Loss of natural boarder to the park, which separates Beckets Park from a petrol station and Morrisons car park - to have even more building around a park in a town centre location will mean loss of a valuable green space. It is also well evidenced that people living next to a park often have issues with noise/ASB which will impact upon the council and police having to deal with such complaints.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from noise.
<b>Representation reference:</b> 152/1/10	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b>	<b>Comments:</b>	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 32 requires all major planning

<p><b>Name:</b> Buddies of Beckets</p>		<p>Plan is legally compliant.  Plan is sound.</p>	<p>I oppose building on the St Johns embankment for the following reasons: Increase in traffic in already congested/polluted area</p>		<p>applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.</p>
<p><b>Representation reference:</b> 152/1/11  <b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Competing access needs with the University and Marina - there is already an issue with competing pedestrians and vehicles in this area and bringing more residents into the area will only increase these demands and cause more tensions.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as</p>

					encouraging active lifestyles and well-being.
<p><b>Representation reference:</b> 152/1/12</p> <p><b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Loss of historical interest of the Northampton to Bedford railway line.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the significance of the asset and justify any loss.</p>
<p><b>Representation reference:</b> 152/1/13</p> <p><b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon - it does not appear to be the easiest piece of land to access and remove a large quantity of soil and whatever else is underneath from the disused railway. This will have a massive impact upon the park users whilst this work goes on.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone a complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.</p>

<p><b>Representation reference:</b> 152/1/14</p> <p><b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: More building on flood risk area reducing ability for water to drain away naturally - on a recognised flood risk area to introduce more concreted area which will not allow water to flow away naturally will increase the risk of flooding.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported</p>
<p><b>Representation reference:</b> 152/1/15</p> <p><b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Loss of natural habitat and established trees - given the pollution levels in this area of town these trees will be contributing to lowering the CO2 levels and to lose them will have a massive impact upon an already over polluted area.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.</p>
<p><b>Representation reference:</b> 152/1/16</p> <p><b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Loss of natural boarder to the park, which separates Beckets Park from a petrol station and Morrisons car park - to have even more building around a park in a town centre location will mean loss of a valuable green space. It is also well evidenced that people living next to a park often have issues with</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected</p>

			noise/ASB which will impact upon the council and police having to deal with such complaints.		to be retained as part of the site's development. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from noise.
<p><b>Representation reference:</b> 152/1/17</p> <p><b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Increase in traffic in already congested/polluted area.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.</p>

<p><b>Representation reference:</b> 152/1/18</p> <p><b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Competing access needs with the University and Marina - there is already an issue with competing pedestrians and vehicles in this area and bringing more residents into the area will only increase these demands and cause more tensions.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.</p>
<p><b>Representation reference:</b> 152/1/19</p> <p><b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: Loss of historical interest of the Northampton to Bedford railway line.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the significance of the asset and justify any loss.</p>
<p><b>Representation reference:</b> 152/1/20</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b></p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons:</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone a</p>



<p><b>Name:</b> Buddies of Beckets</p>		<p>Plan is legally compliant.  Plan is sound.</p>	<p>How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon - it does not appear to be the easiest piece of land to access and remove a large quantity of soil and whatever else is underneath from the disused railway. This will have a massive impact upon the park users whilst this work goes on.</p>		<p>complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.</p>
<p><b>Representation reference:</b> 152/1/21  <b>Name:</b> Buddies of Beckets</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> I oppose building on the St Johns embankment for the following reasons: More building on flood risk area reducing ability for water to drain away naturally - on a recognised flood risk area to introduce more concreted area which will not allow water to flow away naturally will increase the risk of flooding.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported.</p>
<p><b>Representation reference:</b> 172/1/3  <b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Soundness: - not specified</p>	<p><b>Comments:</b> Homes England are taking forward landholdings throughout Northampton and welcome the following sites' allocation for housing and / or housing led development in Policy 13 Residential and Other Residential Led Allocation and Policy 38 Development Allocations. Ransome Road Gateway Gate Lodge, The Green, Great Houghton, Upton Reserve Site, Ransome Road.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

<p><b>Representation reference:</b> 172/1/5</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> Homes England have undertaken work on indicative site capacity of these sites which indicate that the Dwelling Capacity in Policy 13 for a number of these sites is incorrect. As such Homes England objects to the wording of Policy 13 as currently drafted. Please see our more detailed comments on Site Specific Policies 41 &amp; 43 for Refs 1098 &amp; 1139. As currently drafted, the policy is too prescriptive and does not meet the test of soundness by failing to plan positively by artificially limiting sites' capacity and their ability to contribute to meeting the area's objectively assessed needs. The policy is inconsistent with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2019, Paragraph 11).</p>	<p><b>Suggested changes:</b> Homes England therefore requests the following changes to Policy 13 to make the Plan sound. 1139 - Ransome Road - Indicative dwelling capacity 500 (5YHLS)</p>	<p><b>Officer comments:</b> Policy 43 states that development of "at least" 200 dwellings will be required. This means that the housing capacity could be raised. There is no need to change the capacity for the site.</p>
<p><b>Representation reference:</b> 185/1/10</p> <p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> We are pleased to see that the boundary of this allocation for 23 dwellings has been modified so that it no longer includes a section of Kingsthorpe Meadows Local Nature Reserve and Local Wildlife Site. Kingsthorpe Meadows already receives a high number of visitors and therefore, any additional pressure from new developments is concerning. For this allocation to be in line with Policies 27 (Green Infrastructure) and 29 (Supporting and Enhancing Biodiversity) it will need to carefully consider how it will provide a net gain in biodiversity within the application site and also contribute towards the enhancement of the wider green infrastructure in the area, including Kingsthorpe Meadows.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 185/1/12</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> This policy has also been improved since the previous version of the Local Plan Part 2; however, it is still of concern as its potential link to the Upper Nene Valley Gravel Pits Special Protected Area (SPA) has not been established. The Habitats</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Surveys are expected to be undertaken by the applicant and will be</p>

Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire		Plan is sound.	Regulations Assessment and Policy 41 requests that over-wintering bird surveys should be conducted to investigate the importance of the allocation to the SPA and, using the results of these surveys, to suggest suitable mitigation measures; if it is possible to do so. The area suggested for ecological enhancement within the proposal (Figure 20) seems to have been chosen for landscape rather than biodiversity reasons and is likely to be used for recreation and therefore to be highly disturbed. Policy 41 also lists a range of other issues to be considered within this allocation. We would strongly recommend that the over-wintering bird surveys are carried out as soon as possible so that the importance of the allocation (as functionally linked land) to the SPA and the mitigation/compensation which may be required are clearly established and used to reassess the suitability of the allocation.		advised to undertake surveys at the outset. No change.
<b>Representation reference:</b> 195/1/15  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> It is clear from Call for Sites submissions and the Council's Land Availability Assessment that the development options available within the Borough have exhaustively been considered and that there are no other sources of supply other than those which have been identified for development within the accompanying proposals map.  In pointed response to Policy 13, the inclusion of site 1107 (Former Abington Mill Farm, land off Rushmere Road) is welcomed and the content of those earlier submissions in respect of the site remain valid. The site is immediately available, suitable, sustainable, deliverable and viable for residential development purposes and is capable of being delivered within the first 5 years of the plan's adoption. However, it is considered that the proposed allocation should be extended to include that land, as shown in blue at Plate 1, which falls under the ownership of Northampton Borough Council.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<b>Representation reference:</b> 195/1/19  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Turning to the site-specific allocations and policies which are addressed within Chapter 13, the respondent would first like to commend the bold approach which the Council have sought to adopt in clearly defining the significant number of development sites available within the Borough. It is considered that this approach provides landowners, including those with a legal interest, absolute clarity on the potential future options for the development of their land and property interests.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 200/1/7  <b>Name:</b> HBF	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> The LPP2 should ensure the availability of a sufficient supply of deliverable and developable land to deliver the Borough's housing requirement. This sufficiency of HLS should meet the housing requirement, ensure the maintenance of a 5 Years Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measurements. As set out in the LPP2 and the Council's Housing Technical Paper dated July 2020, 7,073 dwellings (37%) of Northampton's housing requirement of 18,870 dwellings are located on five SUEs namely N5, N6, N7, N9 and N9A. The delivery of these SUEs has been slow contributing only 80 completions between 2011/12 – 2018/19. It is no longer expected that all dwellings on SUEs will be completed before the end of plan period in 2029. It is now anticipated that completions from SUEs will total only 5,959 dwellings as opposed to circa 8,000 dwellings anticipated in the adopted WNJCS.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 200/1/8  <b>Name:</b> HBF	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound:	<b>Comments:</b> The Northampton LPP2 deals only with housing shortfalls from the five SUEs located in the Borough by proposing additional housing land allocations. The LPP2 allocates 71 housing / housing led sites for circa 3,804 dwellings as set out in Policies 13 & 38. Housing delivery is maximised, where a wide mix of	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The SAMLAA investigations concluded that 52% of sites allocated for

		<ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p>sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. The LPP2 allocations include a wide range of sites by both size and market locations, which should provide access to suitable land for small local, medium regional and large national housebuilding companies as well as providing opportunities for a wide range of different types of dwellings to meet the housing needs of all households.</p> <p>Under the 2019 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The Council should confirm compliance with this aspect of national policy.</p>		housing are under 1 hectare.
<p><b>Representation reference:</b> 200/1/10</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 13 and general</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:  <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul> </p>	<p><b>Comments:</b> The HBF would not wish to comment on the merits or otherwise of individual sites selected for allocation but it is critical that the Council's assumptions on lapse rates, non-implementation allowances, lead in times and delivery rates contained within its overall HLS, 5 YHLS and housing trajectory are correct and realistic. These assumptions should be supported by parties responsible for delivery of housing and sense checked by the Council. The Council has provided limited information / supporting evidence on a site by site analysis of the deliverability of individual site allocations.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 219/1/7</p> <p><b>Name:</b> Fiona Lungley</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:  <ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> </ul> </p>	<p><b>Comments:</b> I am not happy about the plan to get rid of the area between beckets park and Morrison's car park.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Northampton is required to deliver 18,870 homes by 2029. Sites allocated within the LPP2 have been assessed</p>

					for their suitability through the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process.
<p><b>Representation reference:</b> 219/1/8</p> <p><b>Name:</b> Fiona Lungley</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> My concerns are for possible flooding! Also getting rid of all those well established trees and all that will do to the oxygen levels, pollution levels, the natural habit for wildlife that currently live there.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported. Policy 29 of the LPP2 requires all major development</p>

					to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 219/1/9  <b>Name:</b> Fiona Lungley	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> It's a terrible shame for those living in the area not to mention the noise it will create.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity including from noise and poor air quality.
<b>Representation reference:</b> 219/1/10  <b>Name:</b> Fiona Lungley	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> Beckett's park has become quite a sanctuary in recent months for employees in the area especially from the hospital for their lunch breaks etc	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The site that has been allocated sits adjacent to Beckett's Park and will not encroach onto the park.
<b>Representation reference:</b> 219/1/11  <b>Name:</b> Fiona Lungley	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> I also believe it will negatively effect the wildlife in Beckett's park not to mention the increase in traffic in an already over grown area that's hard to get through at the best of times.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and /

					<p>or creation of new habitats.</p> <p>Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.</p>
<p><b>Representation reference:</b> 219/1/12</p> <p><b>Name:</b> Fiona Lungley</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> I believe this is a very under thought plan!</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has been through a thorough process of evidence gathering and consultation stages since 2016 including at Issues, Options and Sites for allocation stages. Responses at all stages of consultation have been taken into consideration for the Submission Draft LPP2. The LPP2 also has a</p>



					supporting evidence base which has informed the policies and allocations within the Plan.
<p><b>Representation reference:</b> 219/1/13</p> <p><b>Name:</b> Fiona Lungley</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> I am not happy about the plan to get rid of the area between beckets park and Morrison's car park.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Northampton is required to deliver 18,870 homes by 2029. Sites allocated within the LPP2 have been assessed for their suitability through the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process.</p>
<p><b>Representation reference:</b> 220/1/2</p> <p><b>Name:</b> Kathleen Tomsett</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> I object to this strip of land being built on because it would require a number of trees being felled. These trees not only soak up pollution from the significant amount of traffic but also provide habitat for birds, squirrels and other wildlife. I walk in the park virtually every day and it is a pleasure to see and hear the birds. The park is an asset and it would be appalling to destroy parts of it like this. There must be other sites locally that housing can be built on without destroying natural habitat.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The Council has undertaken a robust land availability exercise which takes into consideration a number of key issues including trees. It was concluded that this site is suitable for development and there will be policies in place which will mitigate against any</p>

					issues associated with the natural environment. Any proposal that comes forward will need to comply with the relevant policies contained in the plan including Policy 29 (supporting and enhancing biodiversity).
<p><b>Representation reference:</b> 220/1/3</p> <p><b>Name:</b> Kathleen Tomsett</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> I object to this strip of land being built on because it would require a number of trees being felled. These trees not only soak up pollution from the significant amount of traffic but also provide habitat for birds, squirrels and other wildlife. I walk in the park virtually every day and it is a pleasure to see and hear the birds. The park is an asset and it would be appalling to destroy parts of it like this. There must be other sites locally that housing can be built on without destroying natural habitat.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The Council has undertaken a robust land availability exercise which takes into consideration a number of key issues including trees. It was concluded that this site is suitable for development and there will be policies in place which will mitigate against any issues associated with the natural environment. Any proposal that comes forward will need to comply with the relevant policies contained in the plan including Policy</p>

					29 (supporting and enhancing biodiversity).
<b>Representation reference:</b> 221/1/8  <b>Name:</b> Sharon Ibrahim	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I have concerns around the following: Loss of natural habitat and established trees.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 221/1/9  <b>Name:</b> Sharon Ibrahim	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I have concerns around the following: Loss of natural boarder to the park, which separates Becketts Park from a petrol station and Morrisons car park.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. The site will not encroach onto the park.
<b>Representation reference:</b> 221/1/10  <b>Name:</b> Sharon Ibrahim	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I have concerns around the following: Increase in traffic in already congested/polluted area.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the

					proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.
<b>Representation reference:</b> 221/1/11  <b>Name:</b> Sharon Ibrahim	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I have concerns around the following: Competing access needs with the University and Marina.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.

<p><b>Representation reference:</b> 221/1/12</p> <p><b>Name:</b> Sharon Ibrahim</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> I have concerns around the following: Loss of historical interest of the Northampton to Bedford railway line.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the significance of the asset and justify any loss.</p>
<p><b>Representation reference:</b> 221/1/13</p> <p><b>Name:</b> Sharon Ibrahim</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> I have concerns around the following: How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone a complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.</p>
<p><b>Representation reference:</b> 221/1/14</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> I have concerns around the following: More building on flood risk area reducing ability for water to drain away naturally.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 7 of the LPP2 sets out the requirements for major development,</p>

Sharon Ibrahim		Plan is unsound: - not justified			including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported.
<b>Representation reference:</b> 222/1/6  <b>Name:</b> Jean Thorne	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> The area is a haven for wildlife, I walk my dog twice a day in Becklet's Park, and there is always birdsong or other wildlife to hear and see.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 222/1/7  <b>Name:</b> Jean Thorne	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> Where are the houses/flats going to have access?	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Safe access to the development will need to be demonstrated at the application stage and will need to comply with Policy 33 of the LPP2.
<b>Representation reference:</b> 222/1/8  <b>Name:</b>	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> There are enough cars going up and down in the park as it is!	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 32 requires all major planning applications to

Jean Thorne		Plan is unsound: - not justified			include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
<b>Representation reference:</b> 222/1/9  <b>Name:</b> Jean Thorne	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> What about the trees opposite?	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 222/1/10  <b>Name:</b> Jean Thorne	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> What about building on brown sites instead of destroying a small patch of land which gives people pleasure?	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Northampton is required to deliver 18,870 homes by 2029. Sites allocated within the LPP2 have been assessed for their suitability through the Sites Allocation Methodology and

					Land Availability Assessment (SAMLAA) process. Brownfield sites are allocated within the plan but it is also necessary to allocate on greenfield sites to meet housing need.
<p><b>Representation reference:</b> 229/1/15</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The policy and preceding paragraphs do not place enough emphasis on the Government's objective of significantly boosting the supply of new housing. Paragraph 7.10 places an over reliance on the West Northampton Strategic Plan becoming adopted in 2022, to benchmark the housing supply targets. Fundamentally, the significant shortfall in housing supply in Northampton Borough Council, should not be parked for a plan review.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The housing target as set out in the West Northamptonshire Joint Core Strategy is expected to be delivered by the end of the Northampton LPP2 period (2029). Any new housing target set out in the West Northamptonshire Strategic Plan will enable a review of the Northampton LPP2.</p>
<p><b>Representation reference:</b> 229/1/16</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p>	<p><b>Comments:</b> The housing figures in NBC's Local Plan does not account for what would be predicable events, such as the Ox-Cam arc. Local Plans should account for predictable events as confirmed by the Inspector in the Aylesbury Vale Local Plan Enquiry. The full quote: "Early review Firstly, I am severely troubled by an approach which envisages that the plan will need to be reviewed soon after adoption.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The Inspector's comment on the Vale of Aylesbury LP relates particularly to the route of the Oxford to Cambridge</p>



		<p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p>Whilst inspectors are generally willing to find a plan sound where one or two finite issues remain unresolved and are relatively peripheral to the main thrust of the plan, it appears that the consequences of an impending government decision on the route of the Oxford Cambs expressway are expected to lead to a fundamental review of the plan's development strategy..</p> <p>Predictable events should be planned for... to be sound VALP should make contingency plans to accommodate them, not simply abandon its function to a future review of uncertain timescale</p> <p>About half of the growth expected to result from the implementation of the Ox-Cam arc is expected to take place in existing settlements, their location is, by definition existing and therefore, known. In my consideration of housing numbers I make recommendations for the plan to take account of that now. "</p> <p>The Ox-Camb arc will have an effect on housing need in the Borough, but this has not been accounted for.</p>		<p>Expressway; which is not going through Northampton. VA also identifies its own housing targets in isolation. NBC's housing targets are set out in the West Northamptonshire Joint Core Strategy. It is a matter for the review of the Core Strategy through the production of the West Northamptonshire Strategic Plan to determine housing targets that take into account growth in the OxCam Arc.</p>
<p><b>Representation reference:</b> 229/1/17</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant:</p> <ul style="list-style-type: none"> <li>- not compliant with duty to cooperate</li> </ul> <p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p><b>Comments:</b></p> <p>Notwithstanding Policy S4 of the WNJCS, this policy should allow the ability to consider new development sites in the NDRA or adjacent to it. Using a criteria based policy that supports residential development, which is deliverable in a 5 year period, would facilitate the requirement to meet the housing needs of Northampton Borough including the planned for events, referred to earlier. In doing so, the policy would then be consistent with Paragraph 27 of the NPPF, whereby the Authority would demonstrate effective and on-going joint working, clearly addressing cross boundary matters.</p> <p>How CIL charging would be applied to such sites and what percentage of affordable housing would apply for sites in the NDRA and those adjacent to it (being considered to be rural)</p>	<p><b>Suggested changes:</b> Modification Policy 13 needs significant revision rather than modification.</p>	<p><b>Officer comments:</b> The NRDA encompasses land not only within NBC's boundary but also within Daventry and South Northamptonshire. The Northampton LPP2 cannot set policy or allocate sites within other districts. NBC has a CIL Charging Schedule</p>

			<p>that would be used to support Northampton Borough’s housing requirements would need to be carefully considered. In some instances there is a 50% affordable housing requirement in rural sites, but only a 35% need for Northampton Borough.</p> <p>The policy is silent on what action would occur if NBC fail to meet the Housing delivery test and/or their continued inability to demonstrate a 5 year supply of deliverable housing sites. The policy needs to be explicit on the presumption, in favour and the triggering of, paragraph 11 part d) of the NPPF.</p> <p>The policy is therefore not justified, positive or effective by virtue of the overarching aims to boost housing supply and how it being silent on the effect of CIL charging.</p>		<p>which applies to development and S106 contributions are used to provide supporting infrastructure for developments. No modification required.</p>
<p><b>Representation reference:</b> 232/1/8</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not “sound” (para. 35 of the NPPF), in being neither “justified” (in not being “an appropriate strategy”) nor “effective” (in not being “deliverable over the Plan period”). Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites 0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.</p>	<p><b>Suggested changes:</b> Would like sites 0168, 1009 and 1142 considered as 1 large site.</p>	<p><b>Officer comments:</b> Agreed.</p>

<p><b>Representation reference:</b> 232/1/10</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Policy 13 and policies map</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not “sound” (para. 35 of the NPPF), in being neither “justified” (in not being “an appropriate strategy”) nor “effective” (in not being “deliverable over the Plan period”). Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites 0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.</p>	<p><b>Suggested changes:</b> Would like sites 0168, 1009 and 1142 considered as 1 large site.</p>	<p><b>Officer comments:</b> Agreed.</p>
<p><b>Representation reference:</b> 232/1/11</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Vistry and Lagan have commissioned Define to determine the housing capacity of the land between the NSSUE and the railway line, taking account of the constraints affecting that capacity (noise and air pollution from the M1 motorway; noise and vibration from the Northampton Loop Line railway; the floodplain of the Wootton Brook; hedgerows within the site; utilities easements crossing the site; and land needed for public open space, children’s play provision and surface water drainage attenuation). Assuming a suitable average net density of 40 dwellings per hectare, Define has determined that the land between the NSSUE and the railway line can accommodate some 336 dwellings.</p>	<p><b>Suggested changes:</b> Consider the LPP2 indicative capacity is too high for sites LAA0168, 1009 and 1142 and that the excess should be accommodated within Northampton South SUE.</p>	<p><b>Officer comments:</b> The current capacity of sites LAA0168, 1009 and 1142 in Policy 13 is indicative and not confirmed. However, as the sites is recommended to be combined, it is acceptable to change the trajectory. Modify</p>

			<p>The Council currently proposes 361 dwellings across the three sites (0168, 1009 and 1142), which would require an inappropriately high average net density of around 43 dwellings per hectare, resulting in an urban form that would be discordant with the average net density of 35 dwellings per hectare within the adjacent NSSUE. We consider that the 'excess' 25 dwellings that it is inappropriate to accommodate on sites 0168, 1009 and 1142 can and should be accommodated within the NSSUE itself, where it would be appropriate to increase the net density of housing in close proximity to its local centre and primary school above the currently permitted 35 dwellings per hectare. In this way, that area of the NSSUE close to its facilities can serve appropriately as its core.</p>		<p>the plan to take into account the revised trajectory for the combined sites.</p>
<p><b>Representation reference:</b> 232/1/17</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan "justified" (appropriate), while the accommodation of the 'excess' 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both "justified" (appropriate) and "effective" (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan "effective" (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p><b>Suggested changes:</b> Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p><b>Officer comments:</b> The respondent commented that these sites should be combined and a revised trajectory provided. This recommendation is considered acceptable. Modify Policies 13 and 38 and the Policies Map to reflect the recommended combined sites.</p>
<p><b>Representation reference:</b> 232/1/19</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Policy 13 and policies map</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p><b>Comments:</b> The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan "justified" (appropriate), while the accommodation of the 'excess' 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both "justified"</p>	<p><b>Suggested changes:</b> Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p><b>Officer comments:</b> The respondent commented that these sites should be combined and a revised trajectory</p>

Vistry Latimer Collingtree LLP		- not justified - not effective	(appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.		provided. This recommendation is considered acceptable. Modify Policies 13 and 38 and the Policies Map to reflect the recommended combined sites.
<b>Representation reference:</b> 233/1/8  <b>Name:</b> Lagan Homes	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not “sound” (para. 35 of the NPPF), in being neither “justified” (in not being “an appropriate strategy”) nor “effective” (in not being “deliverable over the Plan period”). Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites 0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.	<b>Suggested changes:</b> Would like sites 0168, 1009 and 1142 considered as 1 large site.	<b>Officer comments:</b> This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the combined sites 0168, 1009 and 1142.
<b>Representation reference:</b> 233/1/10  <b>Name:</b> Lagan Homes	<b>Refers to:</b> Policy 13 and policies map	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound:	<b>Comments:</b> Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not “sound” (para.	<b>Suggested changes:</b> Would like sites 0168, 1009 and 1142 considered as 1 large site.	<b>Officer comments:</b> This recommendation is considered acceptable. Modify the plan and the

		<ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> </ul>	<p>35 of the NPPF), in being neither “justified” (in not being “an appropriate strategy”) nor “effective” (in not being “deliverable over the Plan period”).</p> <p>Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites 0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.</p>		<p>Policies Map to reflect the combined sites 0168, 1009 and 1142.</p>
<p><b>Representation reference:</b> 233/1/11</p> <p><b>Name:</b> Lagan Homes</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Vistry and Lagan have commissioned Define to determine the housing capacity of the land between the NSSUE and the railway line, taking account of the constraints affecting that capacity (noise and air pollution from the M1 motorway; noise and vibration from the Northampton Loop Line railway; the floodplain of the Wootton Brook; hedgerows within the site; utilities easements crossing the site; and land needed for public open space, children’s play provision and surface water drainage attenuation). Assuming a suitable average net density of 40 dwellings per hectare, Define has determined that the land between the NSSUE and the railway line can accommodate some 336 dwellings.</p> <p>The Council currently proposes 361 dwellings across the three sites (0168, 1009 and 1142), which would require an inappropriately high average net density of around 43 dwellings per hectare, resulting in an urban form that would be discordant with the average net density of 35 dwellings per hectare within the adjacent NSSUE. We consider that the ‘excess’ 25 dwellings that it is inappropriate to accommodate on sites 0168, 1009 and 1142 can and should</p>	<p><b>Suggested changes:</b> Consider the LPP2 indicative capacity is too high for sites LAA0168, 1009 and 1142 and that the excess should be accommodated within Northampton South SUE.</p>	<p><b>Officer comments:</b> The current capacity of sites LAA0168, 1009 and 1142 in Policy 13 dicative.</p>

			be accommodated within the NSSUE itself, where it would be appropriate to increase the net density of housing in close proximity to its local centre and primary school above the currently permitted 35 dwellings per hectare. In this way, that area of the NSSUE close to its facilities can serve appropriately as its core.		
<b>Representation reference:</b> 233/1/17  <b>Name:</b> Lagan Homes	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	<b>Suggested changes:</b> Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	<b>Officer comments:</b> This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the combined sites 0168, 1009 and 1142.
<b>Representation reference:</b> 233/1/19  <b>Name:</b> Lagan Homes	<b>Refers to:</b> Policy 13 and policies map	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	<b>Suggested changes:</b> Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	<b>Officer comments:</b> This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the combined sites 0168, 1009 and 1142.
<b>Representation reference:</b> 243/1/4	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b>	<b>Comments:</b> I am acting on behalf of the residents in both Cosgrove Road and Cosgrove Way. I want to give these residents a voice. Many	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> The site has been assessed through

<p><b>Name:</b> Lisa Dawson</p>		<p>Plan is not legally compliant: - not in accordance with SCI - not compliant with duty to cooperate</p> <p>Plan is unsound: - not justified - not effective</p>	<p>are elderly and/or disabled so do not have access to Social media. It is unfair to think that everyone does.</p> <p>We the undersigned are objecting to the proposals to build 6 dwellings (Site Ref: 1086a - Land off Cosgrove Road (Public Open Space). We believe that the proposal will have a significant negative effect on loss of green space, loss of trees and - for many - the loss of open space. We also would like to question road access - including adequacy of parking, loading and turning together with overall traffic generation and Highway Safety.</p> <p>Residents would also like to see any risk assessments that have been carried out - particularly by the emergency services and any provision made for access subject to the plans.</p>		<p>the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process and is considered sustainable with public transport, facilities and amenities nearby. No modification required.</p>
<p><b>Representation reference:</b> 244/1/3</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> It should be stressed at the outset that Bastion supports the Council's overarching approach to the Local Plan Part 2 and the draft allocation at the Farm, Hardingstone. Bastion are very encouraged by the Council's approach to housing delivery and seeking to address past under- delivery in the Borough. It is reassuring that the Council has acknowledged, and is tackling, the slower than anticipated delivery at the Strategic Urban Extensions through reduced reliance on these sites and allocating more small and medium sites on which delivery is known to be consistent, helping 5-year housing land supply and supporting choice and competition as set</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Support welcomed.</p>
<p><b>Representation reference:</b> 244/1/4</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> It should be stressed at the outset that Bastion supports the Council's overarching approach to the Local Plan Part 2 and the draft allocation at the Farm, Hardingstone. Bastion are very encouraged by the Council's approach to housing delivery and seeking to address past under- delivery in the Borough. It is reassuring that the Council has acknowledged, and is tackling,</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Support welcomed.</p>



			the slower than anticipated delivery at the Strategic Urban Extensions through reduced reliance on these sites and allocating more small and medium sites on which delivery is known to be consistent, helping 5-year housing land supply and supporting choice and competition as set out in the National Planning Policy Framework (NPPF). This approach is vital to reinforce and maintain the Council's housing supply and maintain and strengthen the town's position in the Oxford to Cambridge Arc.		
<p><b>Representation reference:</b> 244/1/14</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Notwithstanding Bastion's support for the proposed allocation of Site 0204 under Policy 13 (Residential and other Residential Led Development) given its suitability, availability and deliverability for development set out above, its principal concern for the Plan in terms of 'soundness' relates to the assumed capacity of the proposed allocation in the context of the Plan's stated housing requirement and related approach to its housing delivery trajectory.</p> <p>NBC has only allocated part of the Bastion landholding but has retained the capacity that was promoted for the wider site (i.e. 100 units). It is important for the 'soundness' of the Plan to clarify this position through these representations. Having undertaken further master planning and site capacity work, Bastion can confirm that the proposed allocation 0204 can accommodate approximately 55 units. The Local Plan Part 2 needs to accurately reflect this site capacity in Policy 13 and in the associated housing delivery trajectory to ensure it remains effective and 'sound'.</p> <p>Whilst Bastion's clear and unambiguous priority is to secure this proposed allocation, particularly given its ability to pursue the site in the immediate future and facilitate rapid housing delivery at the site, it importantly notes that there is the potential to reinforce the Plan's 'soundness' by way of</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			<p>extending the allocation and increasing site capacity. The baseline technical assessment confirms that there are no constraints to the adjacent land controlled by Bastion, therefore no technical reason to preclude it from contributing towards the Plan's housing requirement.</p> <p>To assist in any consideration NBC may want to give to this additional land, Bastion has undertaken comprehensive indicative master planning across both the proposed allocation and the adjacent site to demonstrate how coordinated development could be sensitively and effectively achieved.</p> <p>Critically, Bastion do not object to the current proposed allocation but in the context of rationalising the capacity of this site, as set out above, consider that the most logical approach to reinforcing the 'soundness' of the Plan would be to extend the site boundary to include its wider landholding and thus increase the overall allocation capacity. This, however, should be without prejudice to the allocation of the current proposed allocation 0204.</p> <p>The inclusion of the adjacent land (wider site) has the potential to increase the total site capacity up to circa 100 units, subject to detailed master planning and a planning application.</p> <p>It is important to note that throughout the representations and associated supporting documentation the following references are used. For the proposed allocation (NBC reference 0204) this is known as 'draft / proposed allocation' or 'core site' and the adjacent additional land is referred to as 'wider site'.</p>		
<p><b>Representation reference:</b> 244/1/20</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> Bastion is very encouraged by NBC's current approach in relation to housing delivery and supports the position set out in the introductory text on housing delivery and current provision from page 57 onwards. It is reassuring that the Council has</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

Bastion Group		Plan is sound.	recognised the historic problems associated with an over-reliance on the large strategic urban extensions (SUE) and their slower than anticipated delivery rates. While we support the role that SUEs have in delivering comprehensive development and strategic infrastructure, it is noteworthy that they can often experience delays to commencement and slow initial delivery.		
<b>Representation reference:</b> 244/1/21  <b>Name:</b> Bastion Group	<b>Refers to:</b> Policy 13 and policies map	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Notwithstanding Bastion's overriding support for Policy 13 and the proposed allocation of The Farm, Hardingstone (site reference 0204), as set out above in terms of site capacity, it is important for the 'soundness' of the Plan, that the allocation accurately reflects the actual capacity of the allocated area shown by NBC on the Policies Map.	<b>Suggested changes:</b> To reinforce the soundness of Policy 13 and the wider Plan in terms of housing delivery, it would be necessary to amend the allocation to 55 units. To ensure the allocated area also aligns with the ownership boundary, Bastion also seek a minor refinement to the site area shown to comply with the 'Core Site' boundary shown on drawing ref: BPG005-004 Rev A.	<b>Officer comments:</b> It is agreed that the plan should be modified to reflect the correct capacity as supplied by the respondent which is 55 dwellings. The extended area was omitted in error. It is recommended that the site be considered when the plan is reviewed or it can come forward as a windfall site.
<b>Representation reference:</b> 244/1/22  <b>Name:</b> Bastion Group	<b>Refers to:</b> Policy 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Bastion do however, object to a reference in Plan which suggests that the 'Council has researched alternative sites exhaustively' and that there are no other sources of supply to address the five-year housing land supply shortfall. In the context of the necessary reduction in the current allocation at	<b>Suggested changes:</b> In summary, Bastion provide overarching support for Policy 13, however,	<b>Officer comments:</b> It is agreed that the plan should be modified to reflect the correct capacity as supplied by the

			<p>The Farm, Hardingstone, this shortfall will now be increased by circa 45 units. This is despite further land in this location being available.</p> <p>Crucially, Bastion consider that the ‘soundness’ of the Plan can be reinforced through the minor extension of the current proposed allocation at ‘The Farm’. This land is available, suitable and deliverable and has been demonstrated by the Baseline Technical Assessment and master planning to be relatively free of constraints.</p> <p>To ensure that Policy 13 remains effective and accords with national planning policy in terms of meeting local housing needs in line with Paragraphs 11 and 23 of the NPPF to ensure that there is ‘clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development’, Bastion recommend that this additional land is included within the proposed allocation to increase the capacity of the site and reflect what was anticipated in the Plan in terms of its capacity. This would help reinforce the housing requirement in a location where development has already been demonstrated and established as sustainable and deliverable.</p> <p>Bastion can confirm that this additional land can be considered deliverable in accordance with the NPPF as it is available now, offers a suitable location for development now, and is achievable with a realistic prospect that housing will be delivered on the site within five years.</p> <p>In summary, Bastion provide overarching support for Policy 13, however, recommend that to improve the soundness of the policy, Site 0204 should be amended to a capacity of 55 units. Alternatively, to ensure that overall soundness of the Plan is secured, the extent of land</p>	<p>recommend that to improve the soundness of the policy, Site 0204 should be amended to a capacity of 55 units. Alternatively, to ensure that overall soundness of the Plan is secured, the extent of land allocated could be extended to include the ‘wider site’ shown on enclosed drawing BPG005-004 rev A which would enable the site capacity to be retained.</p>	<p>respondent which is 55 dwellings. The extended area was omitted in error. It is recommended that the site be considered when the plan is reviewed or it can come forward as a windfall site.</p>
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			allocated could be extended to include the 'wider site' shown on enclosed drawing BPG005- 004 rev A which would enable the site capacity to be retained.		
<p><b>Representation reference:</b> 251/1/16</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy S3 of the West Northamptonshire Joint Core Strategy ('WNJCS') sets the housing requirement for Northampton Borough from 2011 to 2029 at 18,870 dwellings (1,048 dpa). As set out in the Plan and the Council's Housing Technical Paper13, 7,073 dwellings (37%) of Northampton's housing requirement of 18,870 dwellings are located on five Sustainable Urban Extensions ('SUEs'). However, the Plan confirms that delivery of these SUEs has been slow and it is therefore no longer expected that all dwellings on SUEs will be completed before the end of plan period in 202914. It is now anticipated that completions from SUEs will total only 5,959 dwellings as opposed to circa 8,000 dwellings anticipated in the adopted WNJCS. The Plan allocates 71 housing or housing-led sites for circa 3,804 dwellings as set out in Policies 13 and 38. These allocations include a wide range of sites by both size and market locations. The Developers agree with this approach as it is considered this will provide access to suitable land for small local, medium regional and large national housebuilding companies, as well as providing opportunities for a wide range of different types of dwellings to meet the housing needs of all households.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 35/1/16</p> <p><b>Name:</b> Historic England</p>	<p><b>Refers to:</b> Chapter 7 and evidence base</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> Whilst the evidence base is much improved, with the provision of a detailed Heritage Impact Assessment and the Battlefield Conservation Management Plan, a broader evidence base is still required to reflect heritage assets across the borough, such as including Conservation Area appraisals and Local Lists within the evidence base pages. As proposed, the evidence base</p>	<p><b>Suggested changes:</b> The evidence base should be updated to include heritage in accordance with the NPPF. If the evidence is already available, please</p>	<p><b>Officer comments:</b> Review how the evidence base is listed.</p>

		- not consistent with national policy	remains contrary to the NPPF, in particular paragraphs 31 and 35. Paragraph 31 states that “the preparation and review of all policies should be underpinned by relevant and up-to-date evidence.”  Whilst it is accepted that S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 does not apply, specifically, to Plan making, the absence of any evaluation to address ‘uncertainty’ outcomes in the evidence base for the Plan must bring into question the deliverability of a number of those particular sites and, for some, the amount of development they can accommodate. When the requirements of the Act are eventually undertaken as part of application considerations, it may be found that the quantum of development on some of the sites is, either, unachievable or, at worst, that the need to safeguard the setting of the building actually renders them largely undevelopable.	ensure it its added into the evidence base. Particularly relevant to site and allocations and designations could include the following:- <ul style="list-style-type: none"> <li>• Updating conservation area appraisals and including those already available within the evidence base</li> <li>• Undertaking characterisation studies</li> <li>• Local lists</li> <li>• Assessments of landscape sensitivit</li> </ul>	
<b>Representation reference:</b> 200/1/11  <b>Name:</b> HBF	<b>Refers to:</b> Chapter 7 and viability	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> At the plan-making stage, deliverability of development is very closely linked to viability. The viability of individual developments and plan policies should be tested at the plan making stage. Viability testing should assess the cumulative impact of affordable housing provision, policy compliant standards, infrastructure and other contributions so that there is sufficient incentive for a landowner to bring forward their land for development (2019 NPPF para 34). As stated in the 2019 NPPF, development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (para 34). The Council’s viability assessment should	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Noted. The LPP2 has undergone a full viability assessment.

			take full account of compliance with the requirements of Policies 4, 5, 14, 29, 32, 35, 36 and 37 (see HBF representations below). Viability assessment should not be conducted on the margins of viability. As stated by the Council's viability consultants, the full economic consequences of the Covid-19 pandemic are not yet known and such uncertainty means that a larger viability buffer is necessary (ES13 & ES14). If the resultant Benchmark Land Value (BLV) is lower than the market value at which land will trade, then the delivery of housing targets will not be met. Without a robust approach to viability assessment land will be withheld from the market and housing delivery will be threatened, leading to an unsound LPP2 and housing delivery targets not being met. Viability assessment is an iterative process, in low / middle value areas "trade-offs" between affordable housing provision, CIL, S106 contributions and compliance with policy requirements may be necessary. At Examination, viability will be a key issue in determining the soundness of the Northampton LPP2.		
<b>Representation reference:</b> 200/1/12  <b>Name:</b> HBF	<b>Refers to:</b> Chapter 7 and viability	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> It is noted that the Plan Viability Study by Aspinall Verdi dated June 2020 identifies that brownfield sites in higher value area zone are less viable than greenfield sites (para 5.39), brownfield sites in the lower value zone are on the margins of viability (para 5.42), all apartment developments on brownfield sites (5.44) and specialist housing developments for the over 55's (para 6.8) are unviable on a full policy compliant basis. The Council has not provided any detailed information on the split between brownfield / greenfield site allocations, the location of brownfield / greenfield sites in lower / higher value areas zones or the quantum of development on brownfield / greenfield site allocations. There is reference to a large number of allocations around the town centre in the lower value area (para 5.2). Of the typologies tested circa 50% of sites are brownfield (para 5.8 – 5.13). If viability negotiations	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Noted.

			are required, this could impact on the timely delivery of housing.		
<p><b>Representation reference:</b> 219/1/14</p> <p><b>Name:</b> Fiona Lungley</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> My concerns are for possible flooding! Also getting rid of all those well established trees and all that will do to the oxygen levels, pollution levels, the natural habit for wildlife that currently live there</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Site 1134 is not designated as green space, therefore no loss of greenspace would occur. Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.</p>



<p><b>Representation reference:</b> 219/1/15</p> <p><b>Name:</b> Fiona Lungley</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> It's a terrible shame for those living in the area not to mention the noise it will create.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity including from noise and poor air quality.</p>
<p><b>Representation reference:</b> 219/1/16</p> <p><b>Name:</b> Fiona Lungley</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Beckett's park has become quite a sanctuary in recent months for employees in the area especially from the hospital for their lunch breaks etc.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The site that has been allocated sits adjacent to Beckett's Park and will not encroach onto the park.</p>
<p><b>Representation reference:</b> 219/1/17</p> <p><b>Name:</b> Fiona Lungley</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> I also believe it will negatively effect the wildlife in Beckett's park not to mention the increase in traffic in an already over grown area that's hard to get through at the best of times.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats. Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the</p>

					proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
<p><b>Representation reference:</b> 219/1/18</p> <p><b>Name:</b> Fiona Lungley</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> I believe this is a very under thought plan!</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has been through a thorough process of evidence gathering and consultation stages since 2016 including at Issues, Options and Sites for allocation stages. Responses at all stages of consultation have been taken into consideration for the Submission Draft LPP2. The LPP2 also has a supporting evidence base which has informed the policies and allocations within the Plan.</p>

<p><b>Representation reference:</b> 221/1/15</p> <p><b>Name:</b> Sharon Ibrahim</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> I have concerns around the following: Loss of natural habitat and established trees.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.</p>
<p><b>Representation reference:</b> 221/1/16</p> <p><b>Name:</b> Sharon Ibrahim</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> I have concerns around the following: Loss of natural boarder to the park, which separates Becketts Park from a petrol station and Morrisons car park.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development.</p>
<p><b>Representation reference:</b> 221/1/17</p> <p><b>Name:</b> Sharon Ibrahim</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> I have concerns around the following: Increase in traffic in already congested/polluted area.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design</p>

					principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.
<b>Representation reference:</b> 221/1/18  <b>Name:</b> Sharon Ibrahim	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I have concerns around the following: Competing access needs with the University and Marina.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being
<b>Representation reference:</b> 221/1/19  <b>Name:</b> Sharon Ibrahim	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I have concerns around the following: Loss of historical interest of the Northampton to Bedford railway line.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated

					heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the significance of the asset and justify any loss.
<b>Representation reference:</b> 221/1/20  <b>Name:</b> Sharon Ibrahim	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I have concerns around the following: How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The LPP2 has undergone a complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.
<b>Representation reference:</b> 221/1/21  <b>Name:</b> Sharon Ibrahim	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I have concerns around the following: More building on flood risk area reducing ability for water to drain away naturally.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased

					elsewhere, provide flood risk reduction / betterment will be supported.
<b>Representation reference:</b> 222/1/11  <b>Name:</b> Jean Thorne	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> The area is a haven for wildlife, I walk my dog twice a day in Becklet's Park, and there is always birdsong or other wildlife to hear and see.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 222/1/12  <b>Name:</b> Jean Thorne	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> Where are the houses/flats going to have access?	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 33 requires developments to provide safe and suitable access which will need to be demonstrated at the planning application stage.
<b>Representation reference:</b> 222/1/13  <b>Name:</b> Jean Thorne	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> There are enough cars going up and down in the park as it is!	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate,

					demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
<b>Representation reference:</b> 222/1/14  <b>Name:</b> Jean Thorne	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> What about the trees opposite?	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
<b>Representation reference:</b> 222/1/15  <b>Name:</b> Jean Thorne	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> What about building on brown sites instead of destroying a small patch of land which gives people pleasure?	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Northampton is required to deliver 18,870 homes by 2029. Sites allocated within the LPP2 have been assessed for their suitability through the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process. Brownfield sites are allocated within the plan but it is also necessary to

					allocate on greenfield sites to meet housing need.
<p><b>Representation reference:</b> 228/1/3</p> <p><b>Name:</b> David Russell</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - reason not specified</p> <p>Plan is unsound: - not consistent with national policy</p>	<p><b>Comments:</b> The Former Abington Mill Farm, land of Rushmere Road is regularly flooded and even listed at medium and high risk on the local county council land. I'm concerned as a resident who lives close to this land that work here may merely move the flood risk to areas next to this with my house and my neighbours very close by.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The site was considered for development allocation following a land availability assessment which took into account the land's potential for flooding. Any development proposals will need to conform with flood related policies in the Local Plan and implement, if necessary, flood mitigation measures.</p>
<p><b>Representation reference:</b> 228/1/4</p> <p><b>Name:</b> David Russell</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - reason not specified</p> <p>Plan is unsound: - not consistent with national policy</p>	<p><b>Comments:</b> I'm also concerned about access to this planned area. Rushmere road is extremely busy morning and evenings and this added amount of housing with likely only one way in and out is only going to add to that.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Any proposals that come forward will need to comply with the relevant policies on highways safety and sustainable travel. The Highways authority will also be consulted on any proposals that are submitted through the development</p>



					management process.
<p><b>Representation reference:</b> 231/1/3</p> <p><b>Name:</b> Sally Brannan</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective</p>	<p><b>Comments:</b> We wish to formally object to the Local Plan Part 2 in relation to the planned inclusion of development LAA1107 – Former Abington Mill Farm, land off Rushmere road. Change of Council Policy The development would be contrary to the previous plan to preserve the river valley for Recreational/Leisure use as stated in the 1997 plan. This restricted the use of the riverside landscape and stated “Development for any other use will not be permitted” This was part of the council policy to safeguard the Nene Valley and Tributaries.</p> <p>The previous plan stated “in order to enhance and maintain the value which the river valley affords, it is essential that these open spaces remain undeveloped” – What has changed?</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> National planning guidelines have changed since the previous plan was developed. Housing requirements have also changed and new evidence has been commissioned to inform the Local Plan (Part 2).</p>
<p><b>Representation reference:</b> 231/1/4</p> <p><b>Name:</b> Sally Brannan</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective</p>	<p><b>Comments:</b> Traffic We currently experience a high volume of traffic on Rushmere road, as this is the main road from town leading to the Barnes Meadow Roundabout which is one of the busiest roundabouts in the county. The Bedford Road roundabout links the Brackmills Industrial Estate, dual carriageway (A45) motorway (M1) and Bedford Road. To build a 125 house development at this location and to build a further housing estate will impact this massively, resulting in even further delays/tailbacks to all roads at peak times, specifically up/down Rushmere Road which is often gridlocked stretching back to the Billing Road/Park Ave South Junction. A development of 125 dwelling would lead to around an additional 162 vehicles being forced with no alternative onto the Rushmere Road (Based on a UK average car ownership of 1.3 vehicles per household, excluding London) These 125 households would also have visitors, deliveries etc which would further impact on the amount of</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Traffic modelling has been undertaken by Northamptonshire County Council on behalf of the borough for all development allocations in the Local Plan Part 2.</p>

			<p>vehicles using the Rushmere Road. The Bedford Road roundabout was remodelled in 2019, to take into consideration the additional amount of traffic, which still causes issues of backlog, and rushing to navigate the two lanes that merge into one.</p> <ul style="list-style-type: none"> <li>• The proposed entry to the site would be on a bend which would be a hazard to both traffic coming down and up Rushmere Road, and has the potential of being an accident black spot. The potential for the entrance is very limited, due to the river, and path to Brackmills</li> <li>• On match days at the Old Scouts Rugby Club, the parking is already an issue that we face on Rushmere Road and Tanfield Lane. Having a further entry and exit point on, an already busy part, will be a further hazard</li> <li>• The proposed development is within 50m of the A45 and the site proposed would be likely to become an AQMA area similar to other plots placed in similar locations.</li> <li>• Due to the location and natural barriers to movement such as the A45 and the River this would make the use of a car an almost certainty for all travel to and from the estate.</li> </ul>		
<p><b>Representation reference:</b> 231/1/5</p> <p><b>Name:</b> Sally Brannan</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective</p>	<p><b>Comments:</b> Wildlife/Natural Environment/Open Space</p> <ul style="list-style-type: none"> <li>• The area of land in question currently has a large amount of wildlife living within. Erecting a housing development will damage the wildlife currently within it. The majority of the site is within the 250m Upper Nene Gravel Pits Special Protection Area. The land should be preserved, it is home to a wide variety of wildlife including bats (seen frequently flying), Minks etc. The land is also currently home to large electricity pylons.</li> <li>• Flooding</li> </ul>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> There are policies in the plan which seek to protect and enhance the natural environment and the biodiversity within it. Each site proposed for development in the Local Plan Part 2 has been assessed</p>

			<ul style="list-style-type: none"> <li>• A number of residents of Tanfield Lane have lived here since the houses were built, and on numerous occasions we have seen the location prone to flooding. Whilst the floods are not heavy, the land does get water logged. Further development will increase the risk of flooding to our properties.</li> <li>• Size of Proposal</li> <li>• In Tanfield Lane we have 89 houses, in a larger size plot than the one being proposed. The size of the development means the houses will be packed in, and there will be overcrowding and more vehicles.</li> </ul>		against its flood potential and policy requirements stipulate that developments do not increase flood risk elsewhere. This could be through mechanisms such as Sustainable Drainage Systems (SuDS).
<b>Representation reference:</b> 231/1/6  <b>Name:</b> Sally Brannan	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective	<b>Comments:</b> Heritage The land is clearly Greenfield land and has been identified as having archaeological potential. There is a scatter of medieval pottery with the potential for more items of interest.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Statutory consultees on heritage, such as Historic England and the county archaeologist, have been consulted. Future applications will require further details to be submitted regarding how development will respond to existing heritage. Any proposals must be in conformity with policies contained in the Local Plan Part 2.
<b>Representation reference:</b> 231/1/8  <b>Name:</b> Sally Brannan	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> To summarise on balance this planned development should be removed from the current local plan as it is clearly unsuitable for development for a vast number of reasons listed about. The local community oppose this development and should this be	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted. The site has been investigated using a robust land availability

		Plan is unsound: - not positively prepared - not justified - not effective	included in the plan and not withdraw we will fight the proposal using all methods available to us including seeking a judicial review, appeals and we will also make contact with appropriate conservation groups for wildlife, waterways and other appropriate groups such as extinction rebellion.		assessment. No modification required.
<b>Representation reference:</b> 232/1/3  <b>Name:</b> Vistry Latimer Collingtree LLP	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> Vistry controls sites 1009 and 1142; and welcomes their proposed allocation for residential development in the draft Plan. Site 0168 is controlled by Lagan, with whom Vistry is collaborating as an adjacent landowner. Both Vistry and Lagan welcome the proposed allocation of that site for residential development in the draft Plan.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 232/1/4  <b>Name:</b> Vistry Latimer Collingtree LLP	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> Vistry controls sites 1009 and 1142; and welcomes their proposed allocation for residential development in the draft Plan. Site 0168 is controlled by Lagan, with whom Vistry is collaborating as an adjacent landowner. Both Vistry and Lagan welcome the proposed allocation of that site for residential development in the draft Plan.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 232/1/5  <b>Name:</b> Vistry Latimer Collingtree LLP	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north. Prospective residents of the three sites would increase the catchment population of local retail and community facilities at the local centre for the NSSUE, increasing the prospect of their delivery and retention; and enhancing footfall and vibrancy in that local centre.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<p><b>Representation reference:</b> 232/1/6</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north. Prospective residents of the three sites would increase the catchment population of local retail and community facilities at the local centre for the NSSUE, increasing the prospect of their delivery and retention; and enhancing footfall and vibrancy in that local centre.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 232/1/7</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north. Prospective residents of the three sites would increase the catchment population of local retail and community facilities at the local centre for the NSSUE, increasing the prospect of their delivery and retention; and enhancing footfall and vibrancy in that local centre.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 233/1/3</p> <p><b>Name:</b> Lagan Homes</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Vistry controls sites 1009 and 1142; and welcomes their proposed allocation for residential development in the draft Plan. Site 0168 is controlled by Lagan, with whom Vistry is collaborating as an adjacent landowner. Both Vistry and Lagan welcome the proposed allocation of that site for residential development in the draft Plan.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

<b>Representation reference:</b> 233/1/4  <b>Name:</b> Lagan Homes	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> Vistry controls sites 1009 and 1142; and welcomes their proposed allocation for residential development in the draft Plan. Site 0168 is controlled by Lagan, with whom Vistry is collaborating as an adjacent landowner. Both Vistry and Lagan welcome the proposed allocation of that site for residential development in the draft Plan.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 233/1/5  <b>Name:</b> Lagan Homes	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 233/1/6  <b>Name:</b> Lagan Homes	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 233/1/7  <b>Name:</b> Lagan Homes	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<p><b>Representation reference:</b> 235/1/3</p> <p><b>Name:</b> Jane Evans</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> The privately owned field in question includes the eastern end of the old flood canal (built in 1926) and Abington Mill Lock, built in the 18th century and situated close to the junction of the flood canal with the old course of the river Nene. Local residents north of the old river, whose gardens back on to the river bank, have seen on the site numerous animals and birds, including muntjac deer. Bats, grass snakes, newts, wildfowl, herons, kingfisher and otters. The latter two are protected by the Wildlife and Countryside Act 1981. Kingfishers are one of the species for which 'it is an offence to intentionally or recklessly disturb at, on or near an active nest'. Regarding otters, 'it is illegal to intentionally or recklessly disturb any otter while it is occupying a structure or place which it uses for shelter or protection'. (Schedule 1, Part 1)</p> <p>The Wildlife Trust BCN notes in their comments on the Draft Local Plan Habitats Regulations that an up-to-date survey has not yet been prepared. (Appendix E, LUC 189, 2nd para.) This is a Local Wildlife Site which should clearly be protected from development. In fact, the Local Plan of 1997 designated this area (by the old course of the river Nene) as associated with Policy L17 which relates to leisure use in association with the river. The Plan stated, 'In order to enhance and maintain the value which the river valley affords, it is essential that these open spaces remain undeveloped'. There is no reason to change the truth of this statement. In fact climate change and the dangers to biodiversity make the statement even more valid today than 23 years ago.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 235/1/4</p> <p><b>Name:</b> Jane Evans</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> The current Draft Local Plan Policy 29, Supporting and Enhancing Biodiversity, (p. 98) states that 'all major new development proposals (should) offset the loss and secure a net gain in biodiversity through the strengthening,</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> All housing sites in the LPP2 have been assessed in the Site Assessment</p>

		Plan is unsound: - not justified	management and / or creation of new habitats ... Development should avoid fragmentation of habitats and links, and address the Northamptonshire Biodiversity Action Plan local priorities for habitats and species'. The site in question here lies between an old orchard and Abington Meadows Nature Reserve to the east and Barnes Meadow Nature Reserve to the west , providing a link in the chain of habitats.		Methodology and Land Availability Assessment which considers all matters relating to the natural environment as one of its areas of investigation.
<b>Representation reference:</b> 235/1/5  <b>Name:</b> Jane Evans	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> This green space is further protected by the West Northamptonshire Joint Core Strategy (WNJCS) (p. 113): The design of the Nene Valley Nature Improvement Area will help develop the next phase of environment improvements along the Nene Valley landscape , enhancing and reconnecting nature on a significant scale.' With this Strategy in mind, the inclusion of site LAA 1107 is illogical and ill thought out. Policy BNS, The River Nene Strategic River Corridor, in the WNJCS (p. 131) further states that 'the natural and cultural environment of the Nene Corridor through the Plan area, including its tributaries , will be enhanced and protected in recognition of its important contribution to the area's green infrastructure network'.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 235/1/6  <b>Name:</b> Jane Evans	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> There is also the obstacle presented by the close proximity of the Washlands RAMSAR site of international significance . The Wildlife Trust BCN has already expressed concern that local residents who walk round the Washlands are disturbing the birds in the Special Protection Area. (Draft Local Plan Habitats Regulations, Appendix E. LUC 189, 2nd para.). A further 125 households nearby will only add to the problem. The Draft Plan calls for a mitigation strategy, but there seems little likelihood of any strategy being effective in this case.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> There are policies in place in the Local Plan Part 2 and the West Northamptonshire Joint Core Strategy which seek to secure the protection of the SPA. Policy 30 of the LPP2 will be modified to confirm



					its commitment to the preparation of a Mitigation Strategy.
<b>Representation reference:</b> 235/1/7  <b>Name:</b> Jane Evans	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> While discussing the nature of this Local Wildlife Site it is useful to mention the issue of heritage. Abington Mill Lock was financed by Sir Frederick Montagu MP in about 1760 when the river Nene was being made navigable down to the North Sea. There was a monument stone erected on the island by the lock, commemorating his generosity. If it is not still there, it may now be in the Northampton Museum. Rendering the river navigable was an important part of Northampton's history and economic development. The site of the Mill could be a heritage asset comparable to Clifford Hill Lock (funded by Spencer Compton MP), where an information panel explains the history. We would hope the Northampton Borough Council (NBC) would have the vision to see the importance of marking the course of the old river and the now derelict lock. In fact the Draft Local Plan (Chap. 10, para. 10.27) supports this vision: The natural and man-made corridors along and following the river Nene are valuable natural and historic assets of great importance for biodiversity as well as the town's legacy of historic private and civic landscapes ... Collectively these provide a diverse assembly of green spaces which contribute to Northampton's local character and sense of place.'	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 235/1/8  <b>Name:</b> Jane Evans	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> The second factor in our objection is the issue of traffic. Road access to the development is via the Rushmere Road. The situation is bad at present without the addition of another 125 households. Another group of residents has already explained this issue in their own Representation, so we shall not go into much detail. At peak times congestion causes queues in both directions between the Barnes Meadow roundabout and the traffic lights at the top of Rushmere Road. One Tanfield Lane	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Traffic modelling has been undertaken by Northamptonshire County Council on behalf of the borough on all sites proposed for

			<p>resident has said that it can take ten minutes to pull out on to the Rushmere Road at peak times . Another access road further down from Tanfield Lane would make matters worse. Added to which, the proposed entry is on a bend where visibility is obscured. We appreciate that the Draft Local Plan requires a developer to provide a mitigating Traffic Plan, but we cannot see how this severe problem of congestion and safety can be solved. Again it seems illogical to include site LAA 1107 in the list of sites for development .</p> <p>The WNJCS Policy C2, New Developments , (p. 67, para. 6.3) states that 'new developments that do not make walking and cycling easy are a reason for Northamptonshire traffic growth being higher than the national average... (para. 6.7) Need to locate development where people can access facilities such as retail, education and employment without using the car.' The new development in question would be very isolated - the only road access being at the bottom of the Rushmere Road which is about a quarter of a mile of steep hill. It is highly likely that all travel would be by car.</p>		allocation in the LPP2.
<p><b>Representation reference:</b> 235/1/10</p> <p><b>Name:</b> Jane Evans</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b></p> <p>The third issue is the flood risk. The Environment Agency's flood prediction website (flood-warning-information.service.gov.uk) says that a significant area of the site in question is at medium to low risk of flooding. Many local residents have pointed out that over several decades they have seen flooding or waterlogging in the field here. We appreciate that developers must provide a flood risk assessment that sets out mitigation measures , but in the present situation of climate change it seems\ particularly foolhardy to risk building on this flood plain.</p> <p>One local resident , Robert Fullinlove of 26 Tanfield Lane , has said that an underground watercourse runs from somewhere near the road bridge , eastwards parallel to the flood canal. It</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> A Strategic Flood Risk Assessment has been conducted for Northampton and development is directed away from areas of highest risk. Furthermore, all development proposed in the LPP2 has been investigated using a robust land</p>

			<p>is only visible in winter and is clearly visible by the contrasting colour of the grass . Any disturbance by contractors' activities would upset the natural order of drainage . The derelict Abington Mill Lock serves the useful purpose of allowing flood water to tumble over from the old course of the river .</p> <p>The NPPF (p. 44 , para . 19) warns Councils that 'plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implication for flood risk'. Site LAA 1107 is surrounded in the north by estates which could be impacted by flooding caused by further building.</p>		availability assessment process.
<p><b>Representation reference:</b> 235/1/11</p> <p><b>Name:</b> Jane Evans</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> It seems extraordinary to us that in the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) (p. 314) the flood risk in LAA 1107 is suggested to be minimal. One important fact which was brought to our attention is that house insurance would not be granted because the site is on a flood plain.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The information used to investigate the sites were from sources such as the Environment Agency. The EA did not have any objections to this allocation.</p>
<p><b>Representation reference:</b> 235/1/12</p> <p><b>Name:</b> Jane Evans</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> The fourth problem is the distance of the site from local amenities . Another group of residents has already analysed in their Representation the positive and negative scoring given in the Sustainability Appraisal , so we do not wish to repeat their arguments . They point out that the site is three kilometres from the nearest co-ed secondary school. (The School for Boys only accepts girls in the 6th form.) The site is also 500 metres from the primary school, 1 km from local shops , and over 1 km from a GP surgery.</p> <p>In the WNJ CS , Policy INF 1 (p. 113, para . 11.9) states that 'new development will be supported by and provide access to</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Every new development brought forward in the LPP2 has been assessed by the Site Assessment Methodology and Land Availability Assessment to take into account a variety of considerations</p>

			in frastruct ure, including phys ical , green and social element s. It will integrate with and complement adjoining communities'. Site LAA 1107 is very isolated in this respect from its adjoining communit ies .		including local amenities.
<b>Representation reference:</b> 235/1/13  <b>Name:</b> Jane Evans	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> <p>The fifth issue relates to soil contamination and soil instability. The estate on Tanfield Lane north of the site was built on the site of a tannery where the soil was contaminated by anthrax. The developers had to remove the contaminated soil and import unaffected soil. One resident, Robert Fullilove of 26 Tanfield Lane, who has lived on the Lane since it was built, has told us that the original Health and Safety report stated that the ground should never again be disturbed. It is possible that the soil on Abington Mill Farm is also contaminated. The SAMLAA acknowledges this fact (p. 314).</p> <p>The same resident explains that the soil is unstable: the land between the flood canal and the A45 is made up of spoil and redundant fill from the building of the A45 and the re-routing of the river Nene. 'In geotechnica/ terms the make-up of this material is still "loose" - in other words unstable , and therefore any building foundation would almost certainly have to sit on piles. This would require a pile driver banging away all day, or as and when the contractor required.' The NPPF (p. 49, para . 170e) requires Councils to prevent 'new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability'.</p>	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted. Further investigation of the ground conditions of the site will be undertaken at the detailed application stage.
<b>Representation reference:</b> 235/1/14  <b>Name:</b> Jane Evans	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound:	<b>Comments:</b> This brings us to the final factor in our Representation: air and noise pollution. The Sustainability Appraisal (p. 315) makes light of the low air quality and noise involved for the residents of any houses built on Abington Mill Farm, scoring them as 'a minor negative'. The site is adjacent to the very busy three lane	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted. Further investigation of the air quality of the site will be undertaken

		- not justified	section of the A45, and the noise is very loud. The site would very likely become an Air Quality Management Area (AQMA), as has a similar location further west along the A45 . There is no way to mitigate this risk. The NPPF (p. 52, para. 180a) requires Councils to 'avoid noise (in new developments) giving rise to significant adverse impacts on health and the quality of life'.		at the detailed application stage.
<b>Representation reference:</b> 235/1/15  <b>Name:</b> Jane Evans	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> Something positive could then perhaps emerge from this, if NBC were to undertake the transformation of this land into a public space where Northampton residents could enjoy the wildlife and learn about the heritage of the town.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Any masterplan for this site should mitigate against the impacts of development upon surrounding wildlife.
<b>Representation reference:</b> 244/1/6  <b>Name:</b> Bastion Group	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> As Bastion has reinforced in its previous representations into the Local Plan Part 2 and the WNSP, its land at The Farm, Hardingstone (both the proposed allocation site and the land immediately to the north) is capable of not only providing a cohesive extension to the village but also being a suitable, deliverable and achievable site and sustainable development in accordance with guidance provided in the NPPF and Planning Practice Guidance. It would be a high quality, integrated development in a sustainable location with it being located adjacent to Hardingstone Village, the emerging Sustainable Urban Extension (SUE) on land east of Hardingstone and Brackmills Industrial Estate. These locational factors were all instrumental in the Secretary of State allowing an appeal in April 2016 for up to 1,000 dwellings and related development on adjacent land for the SUE (APP/V2825/A/14/2228866). Bastion's land holding is within walking distance of existing amenities, schools, employment and frequent bus services. It is worth noting that both Secretary of State and the Inspector saw the SUE's proximity to Brackmills Industrial Estate as a	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

			substantial benefit in the site's sustainability credentials and would improve the operation of Brackmills Industrial Estate by creating a labour pool nearby thereby reducing the need to travel to work by car, minimising travel distances, avoiding long-distance commuting and restricting carbon emissions.		
<b>Representation reference:</b> 244/1/7  <b>Name:</b> Bastion Group	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Having now also recently undertaken a baseline technical assessment across the whole landholding including examining transport, drainage, ground conditions, heritage, landscape and ecology considerations, Bastion is in a position to confirm that the site is largely unconstrained. This reinforces the site's deliverability and feasibility to be brought forward for residential development in a timely manner and indicates that there are no factors that would impede the ability or the viability of the site from coming forward for development, as set out in the Plan.  The baseline technical assessment covers both the proposed allocation, and in light of the fact that the additional land to the north had the potential to further support and help facilitate the allocated site, and possibly provide some modest further growth, this has also been included in the assessment. The baseline reports also help address queries, comments and concerns highlighted in previous assessments of the site undertaken by NBC and in the current Sustainability Appraisal and SAMLAA. A summary of key issues is set out below and this further helps demonstrate how any minor constraints can be addressed through appropriate design and mitigation as part of the development of the site.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 244/1/8  <b>Name:</b> Bastion Group	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> The submitted Transport Topic Paper examines the key transport, access and highway considerations for the site and proposed development, and confirms that site is very well located to facilitate pedestrian and cycle trips to many key	<b>Suggested changes:</b> Noted.	<b>Officer comments:</b> Noted.

		Plan is sound.	<p>destinations, including to Northampton town centre, by way of the existing and developing local cycle and walking network. The site is also within easy walking distance of existing bus stops served by an hourly service or better. It therefore ideally positioned to encourage and facilitate sustainable modes of travel.</p> <p>Furthermore, the transport work undertaken indicates that vehicular access to the site is straightforward through the improvement of an existing access. The required improvements can be achieved using land in the site promoters' control or which is adopted public highway. The potential trip rates for the scale of the allocation means it is unlikely to have a material impact on the operation of the local or wider highway network. Any minor impact could be mitigated through minor improvement works, if deemed necessary through undertaking a Transport Assessment as part of any future planning application.</p>		
<p><b>Representation reference:</b> 244/1/9</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> The Ecological Technical Note submitted with the representations includes the findings of an Extended Phase 1 Survey undertaken in August 2020 and identifies the likely ecological constraints on the site and the need for further surveys, as well as preliminary indications of potential mitigation. This concludes that, subject to the necessary surveys being undertaken and mitigation implemented, there are no significant ecological constraints to bringing the site forward for residential development. Early engagement with Natural England and the Council will help determine appropriate mitigation in relation to the Nene Gravel Pits Special Protection Area and ecological measures within the site, including retention and enhancement of particular hedgerows, mature trees and other boundary features, will help minimise habitat losses.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

<p><b>Representation reference:</b> 244/1/10</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b></p> <p>Cultural heritage has been identified as a potential constraint by NBC as part of the assessment of the site through the Local Plan process. A Heritage Assessment, undertaken in August 2020, is submitted in support of the representations and has informed the early illustrative layout work. The site has been assessed from a cultural heritage perspective to identify any constraints and opportunities and in terms of archaeological assets, the evidence to date derived from the HER, LiDAR data and other relevant sources does not suggest the presence of currently unrecorded archaeological remains on the site of a significance that would prohibit or constrain development. In respect of build heritage, the site makes some positive contribution to settings of both Pittam’s Farmhouse and the Hardingstone Conservation Area, therefore it may be necessary to preserve these aspects of setting through any potential development. Due to the topography of the study site and the historic development of Hardingstone, the area which most strongly contributes to the setting of both the Conservation Area and particularly Pittam’s Farmhouse and its associated buildings is located to the west of the study site. This is considered and accommodated in the emerging illustrative layout. It is considered that the site can be developed in a way which can respond to the setting of the Hardingstone Conservation Area and the heritage assets within it. Green infrastructure will be retained on the western edge of the site to maintain the immediate rural setting of the Conservation Area, with the roads and buildings aligned to retain, in whole or part, the views into and out of the Area. The exact nature of these views and the built form within the study site will be subject to the detailed design process.</p> <p>Therefore, with appropriate mitigation measures in place, it is considered that heritage assets do not present a constraint upon the allocation of the site for residential development.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
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<p><b>Representation reference:</b> 244/1/11</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Landscape</p> <p>A Landscape and Visual Appraisal Note has been prepared and is submitted in support of the representations and has informed the initial illustrative layout. The appraisal undertaken demonstrates that there will be no notable long-term effects as a result of the proposals, and that the site could be accommodated into its context without unacceptable effects. The initial illustrative layout has sought to maintain and enhance the site boundaries to help provide further containment and will incorporate green infrastructure throughout the development, aligned with ecological and drainage requirements, to help further integrate the site into its wider context. Therefore, from a preliminary landscape and visual perspective it is not considered that the site presents any significant constraints that cannot be mitigated.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 244/1/12</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Flood Risk and Drainage</p> <p>An initial review of flood risk and drainage options for the site is presented in the submitted Technical Note and this demonstrates the technical deliverability of drainage solutions for the residential development of the site. The site lies within Flood Zone 1 and thus per NPPF guidelines all types of development including residential are suitable for the site. There is a minimal risk of overland/surface water flooding. The risk of overland flooding is minimal due to the relatively small size of the upstream catchment, the presence of highway drainage within The Green and the greenfield land type immediately south of the site and thus the risk of onsite surface water flooding appears to be caused through onsite retention of rainfall which can be mitigated through reprofiling/a proposed drainage strategy for the proposed</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			<p>development. Mitigation measures incorporated into any future development will reduce the potential impact of flooding within the site and the surrounding area and the development will provide benefits regarding flood risk in comparison to existing conditions.</p> <p>A sustainable drainage solution can be achieved for the site which is likely to include onsite attenuation and discharge to an existing watercourse. As well as accommodating an effective drainage solution, it will provide amenity, landscape and potentially ecological value and will help reduce flood risk onsite and offsite. Therefore, there are no significant flood risk or drainage constraints to the development of the site.</p>		
<p><b>Representation reference:</b> 244/1/13</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Ground Conditions</p> <p>A Preliminary Contamination Risk Assessment has been undertaken and examines the ground conditions and any potential environmental or ground-related risks associated with the development of the site. The assessment indicates that risk from ground instability is low to very low or does not present a hazard at all. From a contamination perspective, any potential moderate risks are limited to those associated with the agricultural buildings in the southern corner of the site, albeit these are isolated and can be mitigated / remediated. There are therefore, no significant ground conditions constraints associated with the site (neither the proposed allocation or the wider site).</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 244/1/15</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> As Bastion has sole control over the total area of the proposed allocation and additional land within the wider site it is able to bring forward a planning application for residential development as soon as possible in line with the Plan-making process to expedite the delivery of new homes. The land is</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			<p>clearly available, suitable, achievable and deliverable (Paragraph 47 of the NPPF) and the design principles of the Plan can be accommodated in bringing forward the site.</p> <p>The comments made in relation to site capacity and the adjacent land do not have any impact on the deliverability and availability of the proposed allocation.</p>		
<p><b>Representation reference:</b> 244/1/16</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> As noted above, and to demonstrate that a coordinated design approach can be achieved, as well as to help inform indicative capacity testing, indicative master planning has been undertaken and is submitted with these representations. We hope that this will provide reassurance to NBC and the Inspector that the site is deliverable, can achieve key design and sustainability objectives and, if beneficial to the soundness of the Plan, can provide for additional land to increase housing delivery and meet the quantum indicated in the Plan.</p> <p>Whilst further master planning work will be undertaken as technical assessment of the site is progressed, as part of the Plan-making process and to support a subsequent planning application, this early concept plan and illustrative master plan are presented at this stage to reinforce deliverability and indicate the key design principles that will inform proposals going forward.</p> <p>Bastion are in a position to progress with a planning application for this site within the next 12 months (both proposed allocation and, if there is a positive policy framework in place, for the adjacent land). This will align with the site's position in the housing trajectory and will ensure it can contribute to NBC's 5 Year Housing Land Supply.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The additional land was inadvertently omitted during the land availability assessment process. Additional land can be allocated when the plan is updated or can come forward as a windfall site.</p>

<p><b>Representation reference:</b> 244/1/27</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Chapter 7 and policies map</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In light of the position set out above in respect of the capacity of the wider site and supporting the overall soundness of the housing requirement to be achieved by the Plan, without prejudice to the existing allocation, Bastion suggest that allocation 0204 is reviewed in terms of the extent of land included and shown on the policies map. These representations clearly demonstrate the suitability, availability and deliverability of the wider Bastion landholding for residential development and recommend that the whole landholding, including the 'wider site', as shown on Plan BPG005-004 A, should be allocated and the policies map amended accordingly.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The extended area was omitted in error. It is recommended that the site be considered when the plan is reviewed or it can come forward as a windfall site.</p>
<p><b>Representation reference:</b> 244/1/28</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Bastion support the general conclusions of the SAMLAA and the resulting recommendation for the allocation of the site. It is not however clear from the audit trail associated with this document or the wider Local Plan evidence base why the 'wider site' under the control of Bastion, and promoted through the Plan process, has not also been considered and appears to have been discounted from assessment. These representations clearly indicate that this wider site is available and suitable for development and therefore should be considered. Notwithstanding Bastion's position and recommendations set out above in respect of the wider site and its potential allocation to further support NBC's housing numbers and as well as the development of the proposed allocation 0204, the current exclusion of this land means that there are incorrect assertions regarding the capacity of site 0204. The site shown in the SAMLAA is considerably smaller than Bastion's original submission yet the site capacity of 100 units has been retained. The 100 unit capacity is reliant on the reinstatement of the wider site, and in the absence of this additional land, the capacity would need to be reduced.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The extended area was omitted in error. It is recommended that the site be considered when the plan is reviewed or it can come forward as a windfall site.</p>

			<p>From a technical perspective, there are concerns raised regarding land stability, ecology and heritage. As is set out above, none of these represent any significant constraints to the development of the site and the assessment should be revisited and scores amended to reflect this position.</p> <p>Bastion also provide reassurance that the land-owner confirms the site (both the proposed allocation and potential wider site) is available for delivery. This therefore should not be presented in the SAMLAA as an uncertainty to the site's suitability.</p>		
<p><b>Representation reference:</b> 247/1/3</p> <p><b>Name:</b> Bellway Homes</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> The site known as 'Land North of Milton Ham, Northampton' is allocated in the proposed submission version of the Local Plan (Policies 13 and 38) – site reference: 1140 for 224 dwellings. We note that the site capacity has been calculated using the developable area percentage (80% for sites of 0.4ha – 10ha) and density (40dph) as set out in the Council's Sites Allocation Methodology and Land Availability Assessment (SAMLAA) (June 2020).</p> <p>Bellway Homes supports the proposed housing allocation on this site.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 247/1/10</p> <p><b>Name:</b> Bellway Homes</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In terms of the Council's SAMLAA, the only additional comment Bellway Homes wishes to make, relates to 'Access', which is rated as 'amber'. To confirm, Bellway Homes are in the process of investigating this position further through the necessary technical work, and will update the Council in due course in support of this proposed housing allocation.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 248/1/14</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p>	<p><b>Comments:</b> Heavy rail reinstatement would likely need grade separation of the former level crossing at London Road - requiring an embankment to elevate the railway line, which might encroach</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

<b>Name:</b> Welland Valley Rail		Plan is unsound: - not effective	a few but vital metres onto site LAA1139. Likewise it may also be necessary to lower the current highway 1-2m at the level crossing location, which would effect surrounding site access onto the highway.		
<b>Representation reference:</b> 248/1/15  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective	<b>Comments:</b> Heavy rail reinstatement would likely need grade separation of the former level crossing at London Road - requiring an embankment to elevate the railway line, which might encroach a few but vital metres onto site LAA1139. Likewise it may also be necessary to lower the current highway 1-2m at the level crossing location, which would effect surrounding site access onto the highway.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 248/1/16  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective	<b>Comments:</b> Heavy rail reinstatement would likely need grade separation of the former level crossing at London Road - requiring an embankment to elevate the railway line, which might encroach a few but vital metres onto site LAA1139. Likewise it may also be necessary to lower the current highway 1-2m at the level crossing location, which would effect surrounding site access onto the highway.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 248/1/17  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective	<b>Comments:</b> Heavy rail reinstatement would likely need grade separation of the former level crossing at London Road - requiring an embankment to elevate the railway line, which might encroach a few but vital metres onto site LAA1139. Likewise it may also be necessary to lower the current highway 1-2m at the level crossing location, which would effect surrounding site access onto the highway.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 248/1/18	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Legal compliance: - not specified	<b>Comments:</b> Heavy rail reinstatement would likely need grade separation of the former level crossing at London Road - requiring an embankment to elevate the railway line, which might encroach	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<b>Name:</b> Welland Valley Rail		Plan is unsound: - not effective	a few but vital metres onto site LAA1139. Likewise it may also be necessary to lower the current highway 1-2m at the level crossing location, which would effect surrounding site access onto the highway.		
<b>Representation reference:</b> 248/1/21  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective	<b>Comments:</b> LAA0333 - Northampton Railway Station (railfreight)- residential Development at this site should not restrict the ability to increase the number of passenger platforms at Northampton station – nor the ability to provide a right-sized RFI terminal for sustainable ‘final mile’ distribution of goods to Northampton.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 250/1/3  <b>Name:</b> St Clair Land and Developments LLP Old Bedford Road	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> At the outset, our client commends the efforts of the Borough Council up to this point in progressing their Part 2 Local Plan, particularly in light of the acute housing land supply issues which are faced within the Borough and the significant threat to housing delivery which the ongoing COVID 19 pandemic continues to have.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Welcomed.
<b>Representation reference:</b> 250/1/4  <b>Name:</b> St Clair Land and Developments LLP Old Bedford Road	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> It is refreshing to learn that the Borough Council are continuing to expedite the production of the Part 2 Local Plan and the following comments are framed against the current macro-economic climate, the challenges faced by the aforementioned pandemic and the changes which the organisation faces as it moves towards unitary status along with Daventry and South Northants Districts.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 250/1/5  <b>Name:</b>	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> It is agreed that an important challenge for Northampton, which the emerging LPP2 should seek to meet, is that of housing delivery for all tenures. The document’s acknowledgement of the challenges posed by the dense built form within the legislative boundary of Northampton is	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

St Clair Land and Developments LLP Old Bedford Road			welcomed and only serves to highlight the significant opportunity which greenfield sites, such as the client's, offer to meeting the existing and future development needs of the Borough.		
<b>Representation reference:</b> 250/1/6  <b>Name:</b> St Clair Land and Developments LLP Old Bedford Road	<b>Refers to:</b> The Plan	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Whilst there has been a historic under delivery of housing within the plan area since 2011, this has been further compounded in 2020 whereby almost two quarters of anticipated delivery has been lost due to the aforementioned ongoing global health crisis.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 250/1/17  <b>Name:</b> St Clair Land and Developments LLP Old Bedford Road	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> It is clear from Call for Sites submissions and the Council's Land Availability Assessment that the development options available within the Borough have been exhaustively considered and that there are no other sources of supply other than those which have been identified for development within the accompanying proposals map.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 250/1/28  <b>Name:</b> St Clair Land and Developments LLP Old Bedford Road	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> It remains our opinion that the site is one of the optimum sustainable locations for residential development in Northampton Borough. Any application for the future development of the site will be supported by a full suite of technical information to demonstrate that there will be no adverse impacts which would weigh against the future development of the site for residential purposes.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 250/1/29  <b>Name:</b>	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> It is therefore considered that there will be significant benefits arising from housing provision coupled with the site's sustainable proximity to services and facilities along with the	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.



St Clair Land and Developments LLP Old Bedford Road		Plan is sound.	raft of economic and social benefits associated with housing delivery will serve to outweigh any perceived impacts.		
<b>Representation reference:</b> 251/1/3  <b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd	<b>Refers to:</b> Chapter 7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective - not consistent with national policy	<b>Comments:</b> Land at Towcester Road (Site ref: LAA1102) is bound by the railway line to the east, the M1 to the south and Towcester Road to the west. As a result, it is extremely well contained and its development would not lead to an unacceptable protrusion into open countryside. Further, the land is not affected by any environmental designations and development of the site would not cause harm to any heritage assets in the context of the Framework. It is acknowledged that the land is affected by topography and will require noise mitigation measures. However, it is considered these constraints can be satisfactory accommodated through the design and layout of the scheme, particularly in the context of noise mitigation, which can be achieved through a 'buffer' to the railway and/or acoustic treatment. Access is currently achieved from the Towcester Road and there is an existing track under the railway line connecting with land to the east (site ref: LAA1109). Whilst this is not currently suitable for vehicles, it has the potential to provide pedestrian and/or cycle access through to the adjoining land, which would be a significant benefit should the Collingtree SUE be extended west in the future. This would ensure connectivity in this area of Northampton, linking the SUE with the Towcester Road. The site is in a sustainable location close to existing properties to the north. A bus stop is located next to the site on the Towcester Road providing regular access into Northampton town centre. As such, the site represents a suitable option for development that is both deliverable and developable. Linden Homes as a national housebuilder, and the Developers, has the ability to deliver housing on the site in the short term helping address the current shortfall in housing across Northampton	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

			Borough. However, it is recognised that the site may also be suitable for other uses, and the Developers would be willing to consider the potential for this with the Council.		
<p><b>Representation reference:</b> 251/1/17</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Chapter 7 and policies map</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> In particular, the Developers support the inclusion of Site 1102 'Site east of Towcester Road allocated for residential development, as set out on the Policies Map.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 251/1/18</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Chapter 7</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> However, it is critical that the Council's assumptions on lapse rates, non-implementation allowances, lead-in times and delivery rates contained within its overall supply, five-year housing land supply and housing trajectory are accurate and realistic. In this regard, the Developers would be pleased to provide further information to the Council demonstrating the deliverability of residential development at Site east of Towcester Road. It is acknowledged that the land is affected by topography and will require noise mitigation measures. However, it is considered these constraints can be satisfactory accommodated through the design and layout of the scheme, particularly in the context of noise mitigation, which can be achieved through a 'buffer' to the railway and/or acoustic treatment. An Indicative Concept Masterplan for the site, enclosed at Appendix 1, has been informed by extensive technical analysis. Access is currently achieved from the Towcester Road and there is an existing track under the railway line connecting with</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			land to the east (site ref: LAA1109). Whilst this is not currently suitable for vehicles, it has the potential to provide pedestrian and/or cycle access through to the adjoining land, which would be a significant benefit should the Collingtree SUE be extended west in the future. This would ensure connectivity in this area of Northampton, linking the SUE with the Towcester Road. The site is in a sustainable location close to existing properties to the north. A bus stop is located next to the site on the Towcester Road providing regular access into Northampton town centre.		
<b>Representation reference:</b> 251/1/31  <b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd	<b>Refers to:</b> Chapter 7 and policies map	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective - not consistent with national policy	<b>Comments:</b> The Developers support the inclusion of Site 1102 'Site east of Towcester Road' allocated for residential development, as set out on the Policies Map	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 229/1/21  <b>Name:</b> Barratt David Wilson Homes	<b>Refers to:</b> para. 7.15	<b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate  Plan is unsound: - not positively prepared - not justified - not effective	<b>Comments:</b> How will this be impacted by the amendment to the Use Classes Order?	<b>Suggested changes:</b> This policy requires significant amendments in light of the amendment to the Use Classes order.	<b>Officer comments:</b> Paragraph 7.15 does not mention the use class order so any changes to it will not alter the guidance within the paragraph. No modification required.

		- not consistent with national policy			
<p><b>Representation reference:</b> 75/1/9</p> <p><b>Name:</b> Town Centre Conservation Area Advisory Committee</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Housing Mix appears to refer only to large new developments, however housing mix is important in existing communities where conversions can create a concentration of single-person or HiMO housing to the detriment of larger households.</p>	<p><b>Suggested changes:</b> Add a sentence: “Conversions should demonstrate how they contribute to reinstating or maintaining a mix of housing types in the immediate community, meeting the varied needs of different households”.</p>	<p><b>Officer comments:</b> Conversions of properties are required to meet the requirements of Policies 3 and 4. The Borough has an Article 4 Direction in place which seeks to regulate the number of Houses in Multiple Occupation in Northampton. No modification required.</p>
<p><b>Representation reference:</b> 97/1/17</p> <p><b>Name:</b> Clayson Country Homes</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> The respondent welcomes the pragmatic approach taken by the Council within Policy 14 and is refreshed to learn of the flexible approach the Council have taken by not prescribing a housing mix based on the outputs of the Strategic Housing Market Assessment. This approach will allow for housing delivery to flexibly respond to changing housing requirements over time.</p>	<p><b>Suggested changes:</b> However, in regard to self and custom build housing, whilst the requirements for such housing are justified, it is considered that the 3-year period (to allow for the reversion to other forms of housing) should be reduced to 1 year to ensure that housing delivery is maintained.</p>	<p><b>Officer comments:</b> It is accepted that planning permission can take up to 3 years to implement. It is considered reasonable to allow for this same time period for the policy requirements to be met.</p>

<p><b>Representation reference:</b> 195/1/16</p> <p><b>Name:</b> Mr B Cheer</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> The respondent welcomes the pragmatic approach taken by the Council within Policy 14 and is refreshed to learn of the flexible approach the Council have taken by not prescribing a housing mix based on the outputs of the Strategic Housing Market Assessment. This approach will allow for housing delivery to flexibly respond to changing housing requirements over time. However, in regard to self and custom build housing, whilst the requirements for such housing are justified, it is considered that the 3-year period (to allow for the reversion to other forms of housing) should be reduced to 1 year to ensure that housing delivery is maintained.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Planning permissions have a 3 year implementation period and it is considered reasonable to apply this same timeline to the requirements for Policy 14. No modification required.</p>
<p><b>Representation reference:</b> 200/1/18</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> As set out in 2019 NPPF, the housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 &amp; 62). All households should have access to different types of dwellings to meet their housing needs. Market signals are important in determining the size and type of homes needed. When planning for an acceptable mix of dwellings types to meet people's housing needs, the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as self &amp; custom builders and the elderly without seeking a specific housing mix on individual sites. The LPP2 should ensure that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 200/1/19</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p><b>Comments:</b> Policy 14 supports serviced plots of land for self &amp; custom build housing on other allocated sites or permitted windfall sites provided this would not result in an over-provision of this type of housebuilding when compared to the Council's supply / demand balance. The Council also supports proposals for self &amp; custom build housing, which include the creation of low cost</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

		<ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	and affordable housing. The HBF is supportive of the Council's policy approach.		
<p><b>Representation reference:</b> 200/1/20</p> <p><b>Name:</b> HBF</p>	<b>Refers to:</b> Policy 14	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p><b>Comments:</b></p> <p>Policy 14 also requires that 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 &amp; custom build housing. After 3 years self &amp; custom build plots remaining vacant can revert to other forms of housing provision. There are 19 site allocations for circa 4,329 dwellings (and presumably the SUEs too) potentially impacted by this policy requirement. The HBF object to this policy requirement.</p> <p>The 2019 NPPF states that policies should be clearly written and unambiguous (para 16). A policy requirement for a proportion of serviced plots for self &amp; custom build housing is unclear and ambiguous, which causes uncertainty for both applicants and decision makers. This is inconsistent with national policy.</p> <p>Under the Self Build &amp; Custom Housebuilding Act 2015 the Council has a duty to keep a Register of people seeking to acquire self &amp; custom build plots and to grant enough suitable development permissions to meet identified demand. The NPPG (ID: 57-025-201760728) sets out ways in which the Council should consider supporting self &amp; custom build. These are :-</p> <ul style="list-style-type: none"> <li>• developing policies in the LPP2 for self &amp; custom build</li> <li>• using Council owned land if available and suitable for self &amp; custom build and marketing such opportunities to entrants on the Register</li> </ul>	<b>Suggested changes:</b> Alterations to the requirement self-build plots.	<b>Officer comments:</b> There were 30 people registered on the self build and custom build database at the time of the policy formulation. A formula was put in place to calculate the number of potential plots required. This policy requirement is considered to be a balance between meeting those needs and not placing onerous demands on housebuilders.

			<ul style="list-style-type: none"> <li>• engaging with landowners, who own housing sites and encouraging them to consider self &amp; custom build and where the landowner is interested facilitating access to entrants on the Register ; and</li> <li>• working with custom build developers to maximise opportunities for self &amp; custom housebuilding.</li> </ul> <p>The Council should not move beyond encouraging provision of self &amp; custom build plots on residential development sites of more than 100 dwellings. The Council should not seek to place the burden for delivery of self &amp; custom build plots onto developers of sites of more than 100 dwellings contrary to national guidance, which outlines that the Council should engage with landowners and encourage them to consider self &amp; custom build. Furthermore, the Council has provided no justification for the selection of 100 or more dwellings as the threshold for qualifying development proposals.</p> <p>As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The Council's Self &amp; Custom Build Register alone is not a sound basis for setting a specific policy requirement. As set out in the NPPG, the Council should provide a robust assessment of demand including an assessment and review of data held on the Council's Register (ID 2a-017-20192020), which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (ID 57-0011-20160401). The Council should analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on housing sites of 100 or more dwellings. It is also possible for individuals and organisations to register with more than one Council so there is a possibility of some double counting. The Register may indicate a level of expression of interest in self &amp; custom build</p>		
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			but it cannot be reliably translated into actual demand should such plots be made available. The number of entries on the Council's Register has not been disclosed.		
<p><b>Representation reference:</b> 200/1/21</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The Council's policy approach should be realistic to ensure that where self &amp; custom build plots are provided, they are delivered and do not remain unsold. Without disclosure of expressions of interest on the Council's Self Build Register, there is a risk of over supply against demand. If demand for plots is not realised, there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council's HLS. If consents are granted but not implemented, then this policy cannot be considered effective. The Council should consider the application of a non-implementation rate to its HLS calculations.</p> <p>The co-ordination of self &amp; custom build plots on housing sites of more than 100 dwellings with the development of the wider site will be challenging. At any one time, there are often multiple contractors and large machinery operating on a housing site. From a practical and health &amp; safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. Where plots are not sold, it is important that the Council's policy is clear as to when these revert to the original developer. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. The Council's proposed 3 years vacancy period is too long creating even greater logistical problems if the original housebuilder has completed the</p>	<p><b>Suggested changes:</b> Alterations to the requirement self-build plots.</p>	<p><b>Officer comments:</b> There were 30 people registered on the self build and custom build database at the time of the policy formulation. A formula was put in place to calculate the number of potential plots required. This policy requirement is considered to be a balance between meeting those needs and not placing onerous demands on housebuilders.</p>



			development and is forced to return to site to build out plots, which have not been sold to self & custom builders.		
<p><b>Representation reference:</b> 200/1/22</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> As well as on-site practicalities, any adverse impacts on viability should be tested. The Council's Plan Viability Study does not consider this policy requirement. The Council expects serviced plots to be provided therefore the financial impacts from delayed delivery or non-delivery of self &amp; custom build should be assessed. There may also be a detrimental impact upon the level of affordable housing provision achieved from sites of 100 or more dwellings because self &amp; custom build dwellings are exempt from infrastructure contributions and affordable home ownership provision as set out in national policy hence a greater burden falls onto fewer market sale dwellings. The Council may wish to adopt an aspirational approach to delivering self &amp; custom build housing, but this should not be pursued at the expense of delivering affordable housing. The requirement for provision of self &amp; custom build plots on sites of 100 or more dwellings should be deleted.</p>	<p><b>Suggested changes:</b> Alterations to the requirement self-build plots.</p>	<p><b>Officer comments:</b> There were 30 people registered on the self build and custom build database at the time of the policy formulation. A formula was put in place to calculate the number of potential plots required. This policy requirement is considered to be a balance between meeting those needs and not placing onerous demands on housebuilders.</p>
<p><b>Representation reference:</b> 200/1/23</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective</p>	<p><b>Comments:</b> Policy 14 also requires that an appropriate proportion of residential development must be designed to meet the requirements of Building Regulations Part M4(2) (accessible &amp; adaptable dwellings) or its successor standard. 4% of all new market dwellings and 8% of affordable dwellings should be constructed to Building Regulations Part M4(3) (wheelchair user dwellings) standards, or their successor, to enable wheelchair accessibility.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Detailed specialist housing requirements are set out in the the Northampton Specialist Housing SPD which applicants should refer to.</p>

		<p>- not consistent with national policy</p>	<p>The 2019 NPPF states that policies should be clearly written and unambiguous (para 16). A policy requirement for an appropriate proportion of residential development to be designed to meet M4(2) standards is unclear and ambiguous, which causes uncertainty for both applicants and decision makers. This is inconsistent with national policy.</p> <p>If the Council wishes to adopt the optional standards for accessible &amp; adaptable dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f &amp; Footnote 46) and the latest NPPG. Footnote 46 states “that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties”. As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011- 20150327) to ensure that an appropriate evidence base is available to support any proposed policy requirements. The NPPG sets out that evidence should include identification of :-</p> <ul style="list-style-type: none"> <li>• the likely future need ;</li> <li>• the size, location, type and quality of dwellings needed ;</li> <li>• the accessibility and adaptability of the existing stock ;</li> <li>• variations in needs across different housing tenures : and</li> <li>• viability.</li> </ul> <p>In determining the quantum of M4(2) and M4(3) homes the Council should focus on the ageing population living in the Borough compared to national / regional figures and the proportion of older households choosing to live in newly built</p>		<p>This contains the most up to date evidence and need requirements for specialist housing in Northampton.</p>
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			<p>homes. It is noted that Office for National Statistics (ONS) Overview of the UK Population dated November 2018 estimated that 18.2% of the UK population were aged 65 years or over in 2017 compared with only 15% in Northampton. Optional M4(2) and M4(3) standards should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as “requiring something because it is essential or very important rather than just desirable”.</p> <p>Many older households already live in the Borough. Many older households will not move from their current home but will make adaptations as required to meet their needs, some will choose to move to another dwelling in the existing stock rather than a new build property and some will want to live in specialist older person housing. The existing housing stock is considerably larger than the new build sector (circa 97,226 dwellings as at 2019) so adapting the existing stock is likely to form part of the solution. It is also important to note that not all health problems affect a household’s housing needs therefore not all health problems require adaptations to homes.</p> <p>All new homes are built to Building Regulation Part M4(1) standards, which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. These standards are not usually available in the older existing housing stock and benefit less able-bodied occupants. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case. M4(1) standards are likely to be suitable for most residents.</p>		
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<p><b>Representation reference:</b> 200/1/24</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> It is noted that Policy H4 of the adopted WNJCS already requires Lifetime Homes standards (para 5.15).</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 200/1/25</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Detailed evidence should be gathered to determine whether there is a need for optional standards in Northampton and to justify setting appropriate policy requirements in the LPP2. The West Northamptonshire Housing Market - Northampton Summary by ORS (September 2017) and the Study of Housing &amp; Supporting Needs of Older People across Northamptonshire 2017 by Three Dragons (March 2017) do not provide an evidential basis to justify the Council's proposed policy requirement. Furthermore, this data is now somewhat dated. The recently published Planning Inspectorate Guidance for Local Plan Examination (para 1.11) sets out that evidence base documents dating from two or more years before the submission date for examination of a Local Plan may be at risk of having been overtaken by new data. Such documents should be updated as necessary to incorporate the most recent available information.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Northampton Borough Council adopted the Specialist Housing SPD in November 2019. It provides evidence, and sets out the need, for optional specialist housing standards in Northampton.</p>
<p><b>Representation reference:</b> 200/1/26</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> It is noted that the Council acknowledges that further work needs to be carried out to establish the proportion of M4(2) dwellings that would be most appropriate (para 7.20 of LPP2) and the Housing &amp; Support Older People in Northamptonshire</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Northampton Borough Council adopted the Specialist Housing</p>

HBF		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Report confirms that adopting M4(2) requires evidence of need (para 4.15).  The policy provides no flexibility for site specific factors (including topography, risk of flooding, etc), which may justify a departure from these proposed policy requirements.		SPD in November 2019. It provides evidence, and sets out the need, for optional specialist housing standards in Northampton.
<b>Representation reference:</b> 200/1/27  <b>Name:</b> HBF	<b>Refers to:</b> Policy 14	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> As set out in the NPPG (ID 56-008) the requirement for M4(3) should only be required for dwellings over which the Council has housing nomination rights.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Para 009 – 56-009 of the PPG relates to Part M of the Building Regulations. It outlines the difference between wheelchair accessible homes and wheelchair adaptable homes which fall into Cat M4(2) of Document M. Policies can be applied to only Cat M4(2) wheelchair accessible homes only where the LA is responsible for allocating or nominating a person to live in that dwelling. Therefore it is acceptable to maintain the policy as it is, and require

					all developers to provide 'adaptable' dwellings. The need is evidenced in the Specialist Housing SPD. Cat M4(3) relates to wheelchair user dwellings and the need in Northampton is evidenced in the Housing Market Evidence. PPG does not limit policy ability, as it does for wheelchair accessible.
<p><b>Representation reference:</b> 200/1/28</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The Council's viability testing should take full account of additional costs for any policy requirements for optional M4(2) and M4(3) standards. The costs of both M4(2) and M4(3) should be included in viability testing. The Council's Plan Viability Study only includes a cost of £521 per dwellings for M4(2) on a baseline assessment of 10% provision and £10,307 per dwelling for M4(3). In September 2014, the Government's Housing Standards Review included cost estimates by EC Harris, which for M4(3) were £15,691 per apartment and £26,816 per house respectively, which are higher than the costs used by the Council. Furthermore, any inflationary cost increases since 2014 should be included and M4(3) compliant dwellings are larger than NDSS therefore larger sizes should be used when calculating additional build costs for M4(3) and any other input based on square meterage.</p>	<p><b>Suggested changes:</b> The requirements for optional M4(2) and M4(3) should be deleted.</p>	<p><b>Officer comments:</b> The Local Plan Viability Assessment was undertaken to assess the viability of policies, and was prepared using the latest market information obtained both through desk top study/ market intelligence and a workshop with developers/ landowners/ agents.</p>

			The requirements for optional M4(2) and M4(3) should be deleted.		
<b>Representation reference:</b> 201/1/9  <b>Name:</b> Persimmon Homes	<b>Refers to:</b> Policy 14	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective - not consistent with national policy	<b>Comments:</b> Draft Policy 14 states that on sites of more than 100 dwellings, provision should be made for a proportion of serviced plots of land to contribute towards meeting evidenced demand for self-build and custom build housing in Northampton. We generally welcome the approach of the overall quantum of self and custom build provision being linked to the “evidenced demand” that exists at the time as per the register of self-build and custom build projects.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 201/1/10  <b>Name:</b> Persimmon Homes	<b>Refers to:</b> Policy 14	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective - not consistent with national policy	<b>Comments:</b> In order for such a policy to be justified, however, we would expect at least some analysis of the existing register in the area supported by necessary additional data from secondary sources in line with the PPG (paragraph 011 Reference ID: 57-011-20160401). There does not appear to be any part of the evidence base that deals with understanding the demand for self-build and custom housing in Northampton Borough and would we note that the Housing Market Evidence paper by Opinion Research Services (September 2017) does not appear to deal with the need for custom or self-build housing at all.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> There were 30 people registered on the self build and custom build register. A formula was used to assess the potential number of sites required. This policy was formulated to ensure that there is a balance between supply and demand of such requirements.
<b>Representation reference:</b> 201/1/11  <b>Name:</b> Persimmon Homes	<b>Refers to:</b> Policy 14	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound:	<b>Comments:</b> In light of this apparent lack of evidence, we do not see how a requirement to incorporate custom and self-build provision is justified. Notwithstanding this point, we would emphasise our general objection to requiring the provision of custom and self-build plots in standard housing schemes.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> There were 30 people registered on the self build and custom build register. A formula

		<ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p>Firstly, these plots are slow to come forward and are vulnerable to the economic circumstances of the individual builder.</p>		<p>was used to assess the potential number of sites required. This policy was formulated to ensure that there is a balance between supply and demand of such requirements.</p>
<p><b>Representation reference:</b> 201/1/14</p> <p><b>Name:</b> Persimmon Homes</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:  <ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul> </p>	<p><b>Comments:</b> Whilst we would support planning for some self and custom build sites over the plan period, it is necessary that any corresponding requirements in this regard are proportionate to demand and we cannot see from the evidence base how this existing demand has been considered to arrive at the wording of draft Policy 14. In general, we would advocate an approach that saw custom and self-build exception sites or land specifically allocated for this type of housing in a manner that corresponds to the evidenced demand rather than custom and self-build plots being required through the delivery of large sites.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> There were 30 people registered on the self build and custom build register. A formula was used to assess the potential number of sites required. This policy was formulated to ensure that there is a balance between supply and demand of such requirements.</p>
<p><b>Representation reference:</b> 201/1/15</p> <p><b>Name:</b> Persimmon Homes</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:  <ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul> </p>	<p><b>Comments:</b> We note that if plots for self-build and custom build remain vacant for three years, then draft Policy 14 allows them to revert to other forms of housing provision. The ability to respond to a lack of uptake is welcome but requiring developers to market custom and self-build plots for three years is an excessive amount of time and we would note that in other authorities (e.g. Kettering Borough Council) the figure is closer to six months.</p>	<p><b>Suggested changes:</b> We would suggest that this is a reasonable period in which to gauge demand following which the plots should be allowed to revert to a</p>	<p><b>Officer comments:</b> It takes 3 years for a planning permission to be implemented. It is considered reasonable to allow the same time line to be applied to this requirement.</p>



				typical residential use.	
<b>Representation reference:</b> 201/1/16  <b>Name:</b> Persimmon Homes	<b>Refers to:</b> Policy 14	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective - not consistent with national policy	<b>Comments:</b> Finally, we would object to the manner in which the requirement to incorporate custom and self-build plots has been tested in the Plan Viability Study (June 2020). We do not see how this could be considered without an indication of the number of custom and self-build units to be delivered over the plan period recognising that requiring developers to hold custom and self-build plots on their books for up to three years will have obvious cash flow implications.	<b>Suggested changes:</b> For the reasons above, Persimmon OBJECTS to draft Policy 14 insofar as it requires the delivery of custom and self-build units on sites of more than 100 units and this element of the policy should be deleted for plan soundness for lack of justification.	<b>Officer comments:</b> There were 30 people registered on the self build and custom build register. A formula was used to assess the potential number of sites required. This policy was formulated to ensure that there is a balance between supply and demand of such requirements.
<b>Representation reference:</b> 228/1/5  <b>Name:</b> David Russell	<b>Refers to:</b> Policy 14	<b>Legal compliance and soundness:</b> Plan is not legally compliant: - reason not specified  Plan is unsound: - not consistent with national policy	<b>Comments:</b> I'm also concerned about access to this planned area. Rushmere road is extremely busy morning and evenings and this added amount of housing with likely only one way in and out is only going to add to that.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Any proposals that come forward will need to comply with the relevant policies on highways safety and sustainable travel. The Highways authority will also be consulted on any proposals that are submitted through the development management process.
<b>Representation reference:</b> 228/1/6	<b>Refers to:</b> Policy 14	<b>Legal compliance and soundness:</b>	<b>Comments:</b>	<b>Suggested changes:</b> None.	<b>Officer comments:</b>

<p><b>Name:</b> David Russell</p>		<p>Plan is not legally compliant: - reason not specified</p> <p>Plan is unsound: - not consistent with national policy</p>	<p>The Former Abington Mill Farm, land of Rushmere Road is regularly flooded and even listed at medium and high risk on the local county council land. I'm concerned a resident who lives close to this land that work here may merely move the flood risk to areas next to this with my house and my neighbours very close by.</p>		<p>The site was considered for development allocation following a land availability assessment which took into account the land's potential for flooding. Any development proposals will need to conform with flood related policies in the Local Plan and implement, if necessary, flood mitigation measures.</p>
<p><b>Representation reference:</b> 229/1/18</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b></p> <p>Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b></p> <p>Paragraph 7.15 refers to the Council and their duty to keep a self-build and custom build register to provide the Council with evidence when making provision for serviced plots of land. However, the paragraph is not explicit in terms of the number of plots on the current register of self-build or custom build register, nor is there reference within the paragraph as to other documents and studies that would form the evidence base for projecting the number of self-build and custom build plots over the plan period. It is, therefore, questionable as to how a trigger of 100 dwellings where provision of self-build and custom build housing will be sought. Furthermore the policy is not explicit as to the mechanisms by which a proportion of self-build or custom build can be negotiated between the Council and the Applicant.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b></p> <p>The number of plots on the register will change throughout the lifetime of the Plan. The applicant should liaise with the Council during the application stage to determine the proportion of self-build and custom build housing required. No modification required.</p>

<p><b>Representation reference:</b> 229/1/19</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Justification has not been given as to why a plot needs to remain vacant for 3 years. Presumably, as it is captured in the S106 obligation, there would be additional requirement to provide evidence of marketing and marketing at a price that would be of an appropriate value to revert to other forms of housing. The policy should provide the ability to demonstrate there is no need for a self-build or custom build plot within the 3 year period by submitting an up to date Housing Need Survey.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The 3 years relates to the timeline of planning consent being implemented. It is reasonable to allow the same time line for this policy requirement to be met. No modification required.</p>
<p><b>Representation reference:</b> 229/1/20</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The housing mix is very prescriptive which does not build in any form of flexibility that could accommodate market demand. Given my comments to policy 13, there might be the need for a different size, type and tenure of house as a result of predictable events. The policy would be more effective in stating percentage ranges. Furthermore, as a result of being too prescriptive, more housing market assessments will be submitted by applicants, which will increase the time taken to determine applications, thus further eroding the Council's ability to meet the required housing delivery targets. It is pleasing to see that an "appropriate proportion" of residential development is required to comply with M4(2) of the building regulation rather than a set %, however, the policy needs to make explicit that an "appropriate proportion" will not only take into account the needs of the Borough but also the site's characteristics and viability. At present, BDW are working with a neighbouring Authority, in the North Northants Joint Core Strategy area, where the site's</p>	<p><b>Suggested changes:</b> Modification "Derived from xxx and xx study, proposals of over 100 dwellings or more will be required to provide a proportion of self-build and custom build, through negotiations between the Council and the Applicant, which takes into account the site's ability to provide such plots</p>	<p><b>Officer comments:</b> The 3 years relates to the timeline of planning consent being implemented. The Council's most recent evidence supports the mix set out in Policy 14. If evidence suggests the mix should be altered, there is flexibility in the policy to be able to demonstrate that.</p>

			<p>characteristics do not lend itself to providing policy 30 of the NNJCS requirements for M4(2) and M4(3) housing, notwithstanding any viability test.</p> <p>The policy is therefore not justified into how the trigger to provide self-build and custom build plots has been derived and nor is it effective in this regard to allow for negotiation between the Council and applicant in terms of the number of self-build and custom build plots are required.</p> <p>The policy does not justify why a plot needs to remain vacant for 3 years.</p> <p>The policy is not effective by virtue of the very prescriptive housing mix which will lead to increased viability assessments being submitted and it is not effective in so far as to the considerations to be taken into account such as the sites characteristics. It is worth nothing that Policy H08, Daventry does allow for consideration of the sites characteristics.</p>	<p>through a viability assessment".</p> <p>"To meet the needs of the Borough's residents and to deliver dwellings capable of meeting their occupants' changing circumstances over their lifetime, an appropriate proportion of residential development, based on the latest available evidence, including the site's characteristics and viability, should be designed to meet the requirements of Building Regulations Part M4(2).</p>	
<p><b>Representation reference:</b> 244/1/23</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Bastion support Policy 14 and the need for developments to respond to local housing need. There is clarity required, however, in terms of where such evidence on the latest need should be sourced from. Details are included in paragraphs 7.14 – 7.20 of the Local Plan, however, it is not clear if it is this that should be applied or if the latest evidence should be obtained from the Strategic Housing Market Assessment, for example. A clear policy position on this is required.</p>	<p><b>Suggested changes:</b> Bastion support Policy 14 and the need for developments to respond to local housing need. There is clarity required, however, in terms of where such evidence on</p>	<p><b>Officer comments:</b> Local housing need is addressed through the WNJCS and the LPP2 must comply with this requirement. There will be new evidence for the Strategic Plan.</p>

			In terms of the provision of affordable housing, Bastion support the principle of this but suggest that in order to improve the soundness of this policy there should be reference to the ability to provide commuted sums or off-site provision in exceptional circumstances. Furthermore, there should be a policy requirement for schemes that cannot provide the necessary 35% affordable housing to be supported by a viability assessment.	the latest need should be sourced from.	
<p><b>Representation reference:</b> 251/1/19</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 14 requires the following in respect of Specialist and 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, an appropriate proportion of residential development, based on the latest available evidence, must be designed to meet the requirements of Building Regulations Part M4(2) (Accessible and adaptable dwellings) or its successor standard. 4% of all new market dwellings and 8% of affordable dwellings should be constructed to Building Regulations Part M4(3) (Wheelchair user dwellings) standards, or their successor, to enable wheelchair accessibility.' NPPF Paragraph 16 states that policies should be 'clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. A policy requirement for an 'appropriate proportion of residential development' to be designed to meet M4(2) standards is unclear and ambiguous, which causes uncertainty for both applicants and decision makers. This element fails the test of soundness and is therefore inconsistent with the Framework.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Detailed specialist housing requirements are set out in the Northampton Specialist Housing SPD which applicants should refer too. This contains the most up to date evidence and need requirements for specialist housing in Northampton.</p>
<p><b>Representation reference:</b> 251/1/20</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> Should the Council wish to apply the optional NDSS to new build dwellings, this should be done in accordance with Footnote 46 of NPPF Paragraph 127(f):</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Northampton Borough Council adopted the</p>

<p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>		<p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>'Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.'</p> <p>As set out under Paragraph 31, all policies should be 'underpinned by relevant and up-to-date evidence', and 'should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.' In this respect, the PPG15 sets out the evidence required to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards: 'Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:</p> <ul style="list-style-type: none"> <li>• the likely future need for housing for older and disabled people (including wheelchair user dwellings).</li> <li>• size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).</li> <li>• the accessibility and adaptability of existing housing stock.</li> <li>• how needs vary across different housing tenures.</li> <li>• the overall impact on viability.'</li> </ul> <p>The Developers consider the Council has failed to robustly demonstrate the need for optional standards nor justified setting appropriate policy requirements through Policy 14. The relevant evidence-base documents comprise 'The West Northamptonshire Joint Planning Unit – Housing Market</p>		<p>Specialist Housing SPD in November 2019. It provides evidence, and sets out the need, for optional specialist housing standards in Northampton.</p>
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			<p>Evidence: Executive Summary for Northampton Borough' (ORS, September 2017) and 'Study of Housing and Support Needs of Older People Across Northamptonshire' (Three Dragons and Associates, March 2017) do not provide an evidential basis to justify the Council's proposed policy requirement.</p> <p>Furthermore, this data is now somewhat dated: the 'Procedure Guidance for Local Plan Examination' (The Planning Inspectorate, June 2019) confirms the evidential requirements of submitted plan16:</p> <p>'Is the evidence base sufficiently up-to-date?</p> <p>Evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older. As a minimum, any such documents should be updated as necessary to incorporate the most recent available information. But this may not be necessary for evidence documents on topics that are less subject to change over time, such as landscape character assessments.'</p> <p>[Emphasis added]</p> <p>It is noted the Council acknowledges that 'further work needs to be carried out to establish the proportion of Category 2 dwellings that would be most appropriate'17. Equally, the Study of Housing and Support Needs of Older People Across Northamptonshire' (Three Dragons and Associates, March 2017) confirms that adopting M4(2) requires evidence of need.</p>		
<p><b>Representation reference:</b> 251/1/21</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Moreover, the Council's viability testing should take full account of additional costs for any policy requirements for optional M4(2) and M4(3) standards. In this regard, the Council's Plan Viability Study (Aspinall Verdi, June 2020) only includes a cost of £521 per dwellings for M4(2) on a baseline assessment of 10% provision and £10,307 per dwelling for M4(3).</p>	<p><b>Suggested changes:</b> Resultingly, the requirements for optional M4(2) and M4(3) should be deleted from this policy.</p>	<p><b>Officer comments:</b> The Local Plan Viability Assessment was undertaken to assess the viability of policies, and was prepared using the latest market</p>

		- not consistent with national policy	In September 2014, the Government's Housing Standards Review included cost estimates by EC Harris: for Category 2 access this was estimated at a range between £520 to £940 per dwelling, and for Category 3 between £7,764 to £23,05219. Both estimates are significantly higher than the costs used by the Council.		information obtained both through desk top study/ market intelligence and a workshop with developers/ landowners/ agents.
<b>Representation reference:</b> 43/1/3  <b>Name:</b> Environment Agency	<b>Refers to:</b> Policy 15	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> For Information - The Northampton Local Plan Part 2... June 2020 has updated the HiMO policy now 15 (was 14) to include some wording on the need to ensure that ground floor bedrooms mitigation flood risk. We are happy with this wording but wish to highlight that in some instances the flood depths in the hazard mapping areas are too great to mitigate and therefore ground floor bedroom would not be supported. The West Northants SFRA update December 2017 has some good advice on HiMO and floor levels. The SFRA states in 9.36 "all planning applications for the conversion of dwellings into homes of multiple occupation, must be accompanied by a site-specific flood risk assessment demonstrating that the accommodation (and indeed the whole development) is safe from the risk of flooding from all sources and includes safe refuge".	<b>Suggested changes:</b> None	<b>Officer comments:</b> Noted. Paragraph 5.30 of the LPP2 sets out that Policy BN7 of the West Northamptonshire Joint Core Strategy supports development that complies with the flood risk assessment and management requirements set out in NPPF, the West Northamptonshire Strategic Flood Risk Assessments and the Environment Agency hazard maps. No modification required.
<b>Representation reference:</b> 228/1/7  <b>Name:</b>	<b>Refers to:</b> Policy 15	<b>Legal compliance and soundness:</b> Plan is not legally compliant:	<b>Comments:</b> I'm also concerned about access to this planned area. Rushmere road is extremely busy morning and evenings and	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Any proposals that come forward will need to comply with



David Russell		- reason not specified  Plan is unsound: - not consistent with national policy	this added amount of housing with likely only one way in and out is only going to add to that.		the relevant policies on highways safety and sustainable travel. The Highways authority will also be consulted on any proposals that are submitted through the development management process.
<b>Representation reference:</b> 228/1/8  <b>Name:</b> David Russell	<b>Refers to:</b> Policy 15	<b>Legal compliance and soundness:</b> Plan is not legally compliant: - reason not specified  Plan is unsound: - not consistent with national policy	<b>Comments:</b> The Former Abington Mill Farm, land of Rushmere Road is regularly flooded and even listed at medium and high risk on the local county council land. I'm concerned a resident who lives close to this land that work here may merely move the flood risk to areas next to this with my house and my neighbours very close by.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The site was considered for development allocation following a land availability assessment which took into account the land's potential for flooding. Any development proposals will need to conform with flood related policies in the Local Plan and implement, if necessary, flood mitigation measures.
<b>Representation reference:</b> 148/1/17  <b>Name:</b>	<b>Refers to:</b> Chapter 8	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> The respondent welcomes the positive and robust approach to economic development as set out within Chapter 8 of the document.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

St Clair Land and Developments LLP		Plan is sound.			
<b>Representation reference:</b> 239/1/3  <b>Name:</b> Duncan Investments Ltd - Houghton Gate	<b>Refers to:</b> Chapter 8	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Duncan Investments Ltd considers that the policy approach in Chapter 8 of the NLP2 would not meet the tests of soundness because:  1. It is not positively prepared; 2. It is not justified; 3. It is not effective; and 4. It is not consistent with national policy. In order to ensure that the Policy approach taken in Chapter 8 is sound it is considered that: The NLP2 should allocate sufficient employment land to address the very significant quantitative and qualitative shortfall of industrial and warehousing land; and	<b>Suggested changes:</b> The NLP2 should allocate sufficient employment land to address the very significant quantitative and qualitative shortfall of industrial and warehousing land.	<b>Officer comments:</b> Policy 18 of the LPP2 states that proposals outside of the safeguarded employment sites will be supported provided they meet certain criteria. No change.
<b>Representation reference:</b> 239/1/4  <b>Name:</b> Duncan Investments Ltd - Houghton Gate	<b>Refers to:</b> Chapter 8	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> The Houghton Gate site should be identified as an employment allocation to help meet this shortfall.  The Houghton Gate site has the potential to help support a range of economic aspirations at the local and sub-regional level, particularly in terms of meeting Northampton Borough's future growth needs.	<b>Suggested changes:</b> The Houghton Gate site should be identified as an employment allocation to help meet this shortfall.	<b>Officer comments:</b> Policy 18 of the LPP2 states that proposals outside of the safeguarded employment sites will be supported provided they meet certain criteria. No change.
<b>Representation reference:</b> 239/2/4  <b>Name:</b>	<b>Refers to:</b> Chapter 8	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> Chapter 8 proposes two economic policies (17 and 18), the first of which seeks to safeguard existing employment sites and the second of which supports new employment developments and	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 38 allocates sites for employment development. No

Duncan Investments Ltd - Houghton Gate		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	schemes outside of safeguarded sites. The NLP2 does not allocate any additional sites for employment development.		modification required.
<b>Representation reference:</b> 123/1/4  <b>Name:</b> Henry Martin Ltd	<b>Refers to:</b> Policy 17	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective	<b>Comments:</b> Policy 17- Safeguarding Existing Employment Sites Paragraph 80 of the NPPF reques planning policies to "help create the conditions in which businesses can invest, expand and adapt'. It also establishes that "Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development." The principle of safeguarding all existing employment sites within the Borough for employment uses is therefore considered to be consistent with the NPPF in respect of supporting economic growth, productivity and business development.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 123/1/5  <b>Name:</b> Henry Martin Ltd	<b>Refers to:</b> Policy 17	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective	<b>Comments:</b> Policy 17 is also considered to support tine overall aims of Policy S8(1)(a) of the West Northamptonshire Joint Core strategy which sets out an ambition to deliver job growth through the renewal and regeneration of existing employment sites. Likewise, the policy approach set out in Policy 17 is deemed to broadly accord with Policy1 of the West Northamptonshire Joint Core Strategy as it seeks to retain existing employment sites and industrial estates to help support a vibrant, successful and developing local economy.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 123/1/6	<b>Refers to:</b> Policy 17	<b>Legal compliance and soundness:</b>	<b>Comments:</b>	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<p><b>Name:</b> Henry Martin Ltd</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>The provisions set out in Policy 17 are also welcomed as they will help to support the future renewal and improvement of the existing business premises at Martin's Yard Business Park. This will enable the owners of the site to respond to the demands of the existing businesses for modern and larger workspaces. Ultimately, this will help to facilitate business growth and thus has the potential to create new job opportunities and protect existing jobs.</p>		
<p><b>Representation reference:</b> 200/1/15</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 17</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. The Council should re-consider the continuing likelihood of 300 dwelling per annum from windfalls where 71 sites for housing development are allocated in the LPP2 and Policy 17 safeguards all existing employment sites.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> There is a criteria in bullet point 2 of Policy 17 that allows for Change of Use. Although not specifically for housing, this is also permitted via Permitted Development.</p>
<p><b>Representation reference:</b> 234/1/6</p> <p><b>Name:</b> Diversified Property Fund For Charities</p>	<p><b>Refers to:</b> Policy 17</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Firstly, the requirement to demonstrate a continuous (and lengthy) period of vacancy of 6-12 months is counterintuitive and may do more harm to economic activity than good in preventing the swift re-occupation with an active use and reducing vacancy periods. It is preferable to have an active economic use of a site (even if an alternative use) than it remain vacant just to satisfy a minimum period specified in policy. DPFC therefore suggest that Policy 17 should be broadened to include additional criteria that could be satisfied as an alternative to allow for the alternative use of units within an Existing Employment Area. These criteria should allow the introduction of non-employment uses where the land or premises are no longer well located or where there is no need</p>	<p><b>Suggested changes:</b> Policy 17 should be broadened to include additional criteria that could be satisfied as an alternative to allow for the alternative use of units within an Existing Employment Area.</p>	<p><b>Officer comments:</b> These criteria are already included in the wording of policy 17.</p>

			to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use.		
<p><b>Representation reference:</b> 234/1/7</p> <p><b>Name:</b> Diversified Property Fund For Charities</p>	<p><b>Refers to:</b> Policy 17</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Secondly, Policy 17 as currently drafted fails to provide a policy framework for the wholesale redevelopment of an Existing Employment site. Grafton Trade Park's location is highly sustainable (as the ELA concluded) whilst it is set within a mix of surrounding uses which will likely become more varied as other land and buildings are released from the employment land designation. Taken together, and depending on the market for units of this type and size in this location, the redevelopment of the Trade Park for a range of high quality uses could represent sustainable development. DPFC therefore suggest there is a need for Policy 17 to be amended so that it supports the wholesale redevelopment of Existing Employment Areas, subject to certain criteria being met. Such criteria could relate to the proportion of units that are vacant across the site, the beneficial impact on amenity that alternative uses could deliver, the requirement for the retention of the existing use with regards to alternative existing premises, and the requirement for the use proposed. The approach that is proposed in the Intend to Publish London Plan (which supports proposals that introduce alternative uses within a designated employment area so long as the level of employment floorspace or job provision is maintained) warrants consideration as an approach.</p> <p>Policy 19</p> <p>This is a general retailing policy contained within the NLLP2. Its scope is broad, identifying a requirement for the provision of a certain amount of retail floorspace over the plan period, outlining the retail hierarchy, re- iterating a town centre first</p>	<p><b>Suggested changes:</b> DPFC therefore suggest there is a need for Policy 17 to be amended so that it supports the wholesale redevelopment of Existing Employment Areas, subject to certain criteria being met.</p>	<p><b>Officer comments:</b> Policy 17, as drafted, does not preclude redevelopment for employment uses. No change.</p>

			approach, and setting the planning policy context for proposals in defined retail frontages. It also, in line with the National Planning Policy Framework (NPPF) (February 2019), reiterates that a sequential test is to be undertaken for all proposals for main town centre uses outside of designated centres and a retail impact assessment for proposals in excess of 500sqm (substantially lower than the default threshold of 2,500m2 set in the NPPF2).		
<b>Representation reference:</b> 234/1/8  <b>Name:</b> Diversified Property Fund For Charities	<b>Refers to:</b> Policy 17	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> There are a number of town centre uses (as defined in the NPPF) that, due to the requirement for large floorplates, onsite car parking or high ceilings are increasingly located (and arguably better suited) within warehouse units within industrial estates. Gyms are a classic example but there are other leisure and retailing uses that would fit into this category and the “light industrial” nature of operations by the existing occupiers within Grafton Trade Park would make it an attractive location for such uses.  Whilst Policy 17 recognises that such uses are likely to be ancillary to, and support the function of, employment areas, at present, if they are characterised as main town centre uses (as defined in the NPPF) there would be a requirement for a sequential test and retail impact assessment. DPFC therefore recommend that the policy wording and accompanying subtext is amended to recognise this and note, in line with the Retail and Leisure Study (Nexus Planning, September 2018) which forms part of the evidence base for the NLLP2, that any retail impact assessment must be proportionate to the proposals.	<b>Suggested changes:</b> DPFC therefore recommend that the policy wording and accompanying subtext is amended to recognise this and note, in line with the Retail and Leisure Study (Nexus Planning, September 2018) which forms part of the evidence base for the NLLP2, that any retail impact assessment must be proportionate to the proposals.	<b>Officer comments:</b> These criteria are already included in the content of policy 17.
<b>Representation reference:</b> 123/1/7  <b>Name:</b>	<b>Refers to:</b> Policy 18	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> Policy 18 - Supporting New Employment Developments and Schemes Outside Safeguarded Sites	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

Henry Martin Ltd		Plan is unsound: - not effective	The approach set out in Policy 18 towards new employment provision outside safeguarded employment sites is supported in principle.		
<b>Representation reference:</b> 148/1/3  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 18	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> The inclusion of the site (Ref: 1101) as an employment allocation within emerging Policy 18 of the DPD has afforded the landowner a level of confidence to progress technical work in respect of the future development of the site.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 148/1/18  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 18	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Policy 18 is considered to provide a robust and flexible approach to supporting the development of new employment sites. Furthermore, it is considered that this approach will lend itself to the flexible development of the client's land at Waterside Way which is a significant site which could be a key contributor towards meeting the Council's economic development strategy.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 239/2/6  <b>Name:</b> Duncan Investments Ltd - Houghton Gate	<b>Refers to:</b> Policy 18	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Duncan Investments Ltd objects to the overall policy approach taken in Chapter 8 as it fails to adequately and positively plan for new employment investment in line with the recommendations of the Council's own evidence base. Duncan Investments Ltd considers that employment land should be allocated in the NLP2 to ensure that future economic growth needs are adequately met. The demand for B-Class development is recognised within the NLP2 [para 8.10] which notes that: "Property market evidence shows that the distribution and general industrial sectors remain the main thrust of the commercial market in Northampton, with the office market weaker in comparison. Class B uses (offices, general industrial, storage and warehousing) provide a substantial proportion of Northampton's employment, but an increasing proportion of	<b>Suggested changes:</b> Duncan Investments Ltd considers that employment land should be allocated in the NLP2 to ensure that future economic growth needs are adequately met.	<b>Officer comments:</b> Allocations for employment are included in Policy 38. Policy 17 safeguards existing employment land and Policy 18 supports employment provision outside of safeguarded employment sites that meet certain criteria. Employment land is

			employment occurs in other uses, such as retail, leisure and the construction industry. The ongoing demand for the more traditional employment land within the B Use Classes Order therefore needs to continue to be accommodated to ensure that there is a balance in the economy in terms of job supply across the sectors.”		also expected to come forward on Sustainable Urban Extensions around Northampton. No modification required.
<p><b>Representation reference:</b> 239/2/7</p> <p><b>Name:</b> Duncan Investments Ltd - Houghton Gate</p>	<p><b>Refers to:</b> Policy 18</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> 2.5 In order to meet this demand, the NLP2 is relying principally upon extensions, intensification, redevelopments and churn on safeguarded employment sites. However, it recognises that additional employment land will be required in order to support additional job creation. With regard to this matter it states: “To support net job creation, it is important to ensure that employment schemes outside the designated employment sites, but which are compatible with their surrounding uses, are considered positively. For example, mixed uses which generate jobs can operate in residential areas and/ or in neighbourhood parades. These can be supported because they provide locally based employment which could reduce the need for travelling, whilst contributing towards jobs growth. This accords with the Government’s aspiration to ensure that planning policies are flexible” 2.6 Whilst Duncan Investments Ltd welcomes the support in Policy 18 for new employment developments and schemes outside of safeguarded site to assist in meeting this requirement, this policy approach does not provide enough certainty or flexibility to ensure that job creation targets will be met.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Allocations for employment are included in Policy 38. Policy 17 safeguards existing employment land and Policy 18 supports employment provision outside of safeguarded employment sites that meet certain criteria. Employment land is also expected to come forward on Sustainable Urban Extensions around Northampton. No modification required.</p>
<p><b>Representation reference:</b> 239/2/8</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Policy 18</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> We consider that the policy approach in the NLP2 is fundamentally flawed as it does not seek to allocate any new employment sites., despite the evidence base supporting such allocations. The NLP2 fails to identify strategic sites, for local</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Allocations for employment are included in Policy 38. Policy 17</p>



<p>Duncan Investments Ltd - Houghton Gate</p>		<p>Plan is unsound:  - not positively prepared  - not justified  - not effective  - not consistent with national policy</p>	<p>and inward investment to match the strategy and to meet anticipated needs over the plan period as required by the Framework.</p> <p>Unless the position is addressed through the preparation of the NLP2, there will be serious implications for growth and it will potentially restrict the potential for economic growth and job creation. This is a matter of key significance that Duncan Investments Ltd considers should be addressed through the preparation of the NLP2 if it is to create the right policy framework to drive economic growth.</p>		<p>safeguards existing employment land and Policy 18 supports employment provision outside of safeguarded employment sites that meet certain criteria.  Employment land is also expected to come forward on Sustainable Urban Extensions around Northampton. No modification required.</p>
<p><b>Representation reference:</b>  239/2/11</p> <p><b>Name:</b>  Duncan Investments Ltd - Houghton Gate</p>	<p><b>Refers to:</b>  Policy 18</p>	<p><b>Legal compliance and soundness:</b>  Plan is legally compliant.</p> <p>Plan is unsound:  - not positively prepared  - not justified  - not effective  - not consistent with national policy</p>	<p><b>Comments:</b>  Duncan Investments Ltd considers that Policy 18 would not meet the tests of soundness because:  1. It is not positively prepared: clarification is required on the detail which would be required in order to satisfy the provisions of the policy.</p>	<p><b>Suggested changes:</b>  In order to ensure that Policy 18 is sound it is considered that:  1. Explanatory text should be provided with the policy to confirm what details would need to be provided in the comprehensive assessment required to demonstrate the suitability of sites for employment.</p>	<p><b>Officer comments:</b>  A comprehensive assessment for proposed new employment provision should address points i) and ii) of Policy 18. No modification required.</p>

<p><b>Representation reference:</b> 229/1/22</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 19</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> How will this be impacted by the amendment to the Use Classes Order?</p>	<p><b>Suggested changes:</b> This policy requires significant amendments in light of the amendment to the Use Classes order.</p>	<p><b>Officer comments:</b> It is agreed that the policy will need to be updated. Modify Policy 19 to reflect changes to the use class order.</p>
<p><b>Representation reference:</b> 237/1/3</p> <p><b>Name:</b> Universities Superannuation Scheme</p>	<p><b>Refers to:</b> Policy 19</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Draft Policy 19 “New Retail Developments and Retail Impact Assessment” of the Northampton Local Plan Part 2 (Proposed Submission) currently proposes that Retail Impact Assessments (RIA) are required for any proposals exceeding 500 sq m outside designated town centres, in order to demonstrate the proposals will not have an unacceptable impact on existing centres in the retail hierarchy. Paragraph 89 of the National Planning Policy Framework (2019) (NPPF) sets a default threshold of 2,500 sq m for RIAs for retail proposals outside designated town centres, if there is not a locally set threshold.</p>	<p><b>Suggested changes:</b> Whilst it is important to protect established town centres, for the following reasons, it is recommended that the threshold set in draft Policy 19 is amended to 2,500 sq m, in line with the NPPF.</p>	<p><b>Officer comments:</b> Northampton Borough Council is allowed to set a local threshold and the Nexus study concluded that the 500sqm threshold was required.</p>
<p><b>Representation reference:</b> 237/1/5</p> <p><b>Name:</b> Universities Superannuation Scheme</p>	<p><b>Refers to:</b> Policy 19</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p><b>Comments:</b> As of 1 September 2020, an amendment to the Use Classes Order Regulations has been brought into effect, which fundamentally changes the approach to the flexibility of uses, and how town centres can expected to be used in the future. It is recognised that Local Planning Authorities and the Planning Inspectorate are considering how these changes will be</p>	<p><b>Suggested changes:</b> If the Council is minded to retain the existing RIA threshold, then the draft Policy 19 wording should be</p>	<p><b>Officer comments:</b> Policy 19 is clear that all relevant applications that meet this threshold will need to provide a Retail Impact</p>

		<ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p>accommodated in emerging local plans. Following these changes, some planning inspectors (South Oxfordshire) have advised that a RIA threshold of 500 sq m may turn out to be ineffective and that this is a new situation that needs to be monitored. The approach sought is amended policy wording that provides the Council with flexibility to adjust the RIA threshold in light of future circumstances.</p> <p>The full implications of the changes made to the Use Classes Order Regulations are currently uncertain, however it is necessary that the draft Policy 19 wording takes a positive and forward looking approach to how buildings and land will be used in future. In order to provide flexibility for landlords to respond to market and consumer changes, and to minimise levels of vacancy across the whole of the authority, including existing out of town locations, it is recommended that the Plan is consistent with the threshold contained in the NPPF.</p>	<p>amended in order to make it clear that RIA requirements will be undertaken in a proportionate and appropriate way, commensurate to the scale of the development proposed, in line with Government guidance.</p>	<p>Assessment. No modifications required.</p>
<p><b>Representation reference:</b> 245/1/3</p> <p><b>Name:</b> Draper Property Northampton Ltd</p>	<p><b>Refers to:</b> Policy 19</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> It is noted that the policy states they support the provision of between 7,000sqm and 8,900sqm net convenience retail floorspace and between 5,300sqm and 7,300sqm net comparison retail floorspace to meet forecast retail expenditure to 2029. However, it is considered that such a policy requirement is overly restrictive on retail provision within suitable town, district and local centre locations, which are deemed the most appropriate locations for retail development.</p> <p>By imposing such a strict requirement for the total retail floorspace within the hierarchy of retail centres, which are considered the most suitable location for retail provision, it will prevent the Council from adapting to evolving circumstances within town centres and the retail sector, particularly considering the impacts of COVID-19 are not yet known. Elsewhere in the Proposed Plan, the Council encourage a mix of uses within town centres (Policy 9, 12 and 21). Insisting that</p>	<p><b>Suggested changes:</b> This part of the policy should therefore be amended to remove any quantifiable provision of floorspace with a more flexible approach adopted directing new retail development to the hierarchy of centre locations.</p>	<p><b>Officer comments:</b> The policy is intended to demonstrate and quantify the capacity of retail floorspace required during the lifetime of the plan, in accordance with the evidence base provided in the Retail Study (Nexus, 2018).</p>

			the above floorspace requirements are met may prevent suitable alternative uses coming forward preventing a mix of uses in town centres and inadvertently, negatively impacting on the vibrancy and vitality of these centres.		
<p><b>Representation reference:</b> 245/1/4</p> <p><b>Name:</b> Draper Property Northampton Ltd</p>	<p><b>Refers to:</b> Policy 19</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In terms of the remaining parts of the policy, the last bullet point states that the “change of use of vacant units into alternative main town centre uses or upper floor residential use will be supported if evidence shows that there is a continuous period of vacancy and marketing for 12 to 18 months and that there are no realistic prospects of the unit being occupied for its previous use”. This part of the policy is once again considered overly restrictive and could potentially lead to numerous vacant units within town centres lying empty for a considerable period of time. Moreover, this could potentially exacerbate any concerns regarding town centres in a post-COVID situation.</p>	<p><b>Suggested changes:</b> A more flexible approach [to policy 19] by removing the need for a specific period of marketing (which appears to be excessive in a recovering economy) will ensure that the Council can support proposals for alternative uses at vacant properties or properties due to become vacant without properties potentially sitting vacant for more than 2 years (to allow for 18 months vacancy and marketing, obtaining planning permission and implementing the use/development). Such an approach could significantly</p>	<p><b>Officer comments:</b> This policy seeks to provide a balanced approach between ensuring that there remains an acceptable supply of retail spaces within the Primary Shopping Area but at the same time allow for change of use subject to evidence of marketing. Combining the outcome of both the consultation exercises and the evidence base provided by Nexus (Retail Study 2018), this timescale is considered to be acceptable.</p>

				jeopardise the recovery and regeneration of town and district centres throughout the local authority area.	
<p><b>Representation reference:</b> 245/1/5</p> <p><b>Name:</b> Drapery Property Northampton Ltd</p>	<p><b>Refers to:</b> Policy 19</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> It must also be noted that Policy 21 supports the delivery of residential accommodation on upper floors in town centres; Policy 12 supports the development of a mix of main town centre and residential uses in town centres; and Policy 9 supports the regeneration of sites within the town centre which will deliver opportunities for housing and economic development for the benefit of Northampton’s residents and the local economy. If town centre properties are required to remain vacant for a period of at least 12-18 months, with suitable marketing, it would seriously impact the Council in achieving their overall aims of the Local Plan and directly contradict other proposed policies which seek to ensure a range of uses, which will ultimately lead to a healthy and vibrant town centre.</p>	<p><b>Suggested changes:</b> While we would suggest that this policy should be amended to remove the period of marketing/vacancy required altogether, as a minimum, the policy should be amended to distinguish between vacant units at ground floor level and vacant units/properties which also comprise upper floors. For example, proposals which seek to retain ground floor retail in a vacant property and provide upper floor</p>	<p><b>Officer comments:</b> This policy seeks to provide a balanced approach between ensuring that there remains an acceptable supply of retail spaces within the Primary Shopping Area but at the same time allow for change of use subject to evidence of marketing. Combining the outcome of both the consultation exercises and the evidence base provided by Nexus (Retail Study 2018), this requirement is considered to be acceptable.</p>

				<p>alternative/residential use should not be required to achieve the same marketing/vacancy criteria as a vacant ground floor unit which seeks a change of use from retail. The former will ensure that primary retail frontages within town centres remain active while introducing new housing/residential accommodation on upper floors which is both supported by other policies and will enhance the vitality and viability of town centres. If such proposals at retail units comprising multiple floors are required to demonstrate that the unit has remained vacant/been marketed it may not only result in long-standing</p>	
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				vacant units at key parts of the town centre, but sites which are considered suitable for residential accommodation not coming forward for a significant period exacerbating both town centre and housing issues in the city. The policy therefore should be amended to note that proposals which seek to change the use of upper floors to residential uses while retaining ground floor retail will be supported by the Council.	
<p><b>Representation reference:</b> 62/1/6</p> <p><b>Name:</b> Northamptonshire County Council / North Northants JPU</p>	<p><b>Refers to:</b> Policy 20</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> We fully support the inclusion of policy 20 in relation to hot food takeaways. While it will not solve the Borough's obesity problems on its own, this is an important policy that will support the local approach to addressing poor diet and obesity, which are formally acknowledged by health sector partners as significant health and wellbeing problems.</p> <p>It responds directly to the specific problems that have been identified in Northampton Borough in relation to people being overweight / obese, including approx. one third of children being overweight or obese by school year 6 and over 60% of</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			<p>the adult population being overweight or obese. It will form a small but important part of the 'whole systems approach to obesity' being taken by Public Health and its partners to address the many factors that influence whether people and communities are able to maintain a healthy diet and a healthy weight.</p> <p>This has been an effective approach taken in other parts of the country and has been accepted as an appropriate policy approach to respond to local challenges in relation to this key health and wellbeing issue.</p>		
<p><b>Representation reference:</b> 113/1/21</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 23</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> We do not believe the Plan to be justified by evidence or effective in dealing with Sports pitches and amenity space, specifically in relation to the following policies: Policy 6 – Health and Wellbeing, Policy 23 – Sports facilities, and playing pitches Policy 28 – Providing open space East Hunsbury is an area without sports pitches and future developments should be required to make provision for community access.</p> <p>There are many in our community who are, or have been, members of Welland Valley Football Club over the years, and the parish council are concerned that the location of the football pitches (off of Ladybridge Drive (Wootton Brook) is not classified as Amenity Green Space. The land has been used as pitches for a number of years and is a prime example of an area of land which should be maintained as amenity green space.</p> <p>The Parish Council would expect that any planning application for development of sites within East Hunsbury would include provision of open space, sports and recreation facilities, and suitable measures to ensure the maintenance of these spaces for the future. The use of management companies has created an unnecessary burden for residents in other areas, and other ways of managing open space should be encouraged.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 seeks to encourage healthy lifestyles through a variety of policies (6, 23 and 28). Policy 23 sets out that development resulting in the loss the loss of existing sports related community facilities, which is well used and valued, will only be acceptable if adequate alternative provision exists. Policy 28 of the LPP2 requires new major development to sustain or enhance open spaces, and contribute to open space provision as</p>



					set out in the standards in Policy 28. It is agreed that there is evidence to suggest that the area in Welland Valley FC (Off Ladybridge Drive) should be designated as Amenity Green Space. Modify the Policies Map accordingly.
<p><b>Representation reference:</b> 229/1/23</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 23</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The policy states “The loss of an existing sports related community facility will only be acceptable if there is existing adequate provision and all reasonable efforts have been made to preserve the facility, but it has been proven that it is not economically viable to be retained.” This element of the policy is inconsistent with the approach given in part c) of Policy 23 Sports Facilities and Playing Pitches, which promotes the idea of providing alternative provision. The loss of an existing sports related community facility, which is well used and valued, does not afford the idea of replacing an existing sports related community facility to provide at least an adequate alternative provision, as referred to in paragraph 97 of the NPPF.</p> <p>There is no mention in the policy that a major Development can contribute to upgrading existing facilities. There is also no mention of relocating facilities that could actually place them in a better catchment area to serve the existing and future occupants of sites in Northampton.</p>	<p><b>Suggested changes:</b> Modification of policies. “For larger scale SUEs, the level and type of open space, sport and recreational facilities will be the subject to agreement between the Council and the Applicant” and within policy 27 “A site of equivalent quality and accessibility can be provided, prior to the use of the</p>	<p><b>Officer comments:</b> The first part of Policy 23 relates to 'sports facilities and playing pitches' and the second part to 'an existing sports related community facility'. The policy goes onto state that 'major developments are expected to contribute to towards providing facilities'; this could be on or off-site. No modification required.</p>

			<p>Where it is not appropriate to create new on-site open space, where viable and in accordance with an obligations SPD, consideration should be given to the potential for new housing Developments to contribute towards the enhancement of nearby off- site open space and recreational facilities.</p> <p>The policy is inconsistent with national policy and is not positively prepared by virtue of not considering that an adequate alternative provision can be provided elsewhere and acknowledging that major development can contribute to the upgrading of existing facilities proportionately within S106 agreements.</p>	existing site ceasing"	
<p><b>Representation reference:</b> 249/1/2</p> <p><b>Name:</b> Sport England</p>	<p><b>Refers to:</b> Policy 23</p>	<p><b>Legal compliance and soundness:</b></p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b></p> <p>To be consistent with national planning policy framework paragraph 97 the policy should refer to playing field not playing pitches. It is also unclear why the types of pitch sports have been listed as this is restrictive with other sports considered to be capable of being a pitch sport, which should be considered as part of Policy 23.</p> <p>The policy is also not effective as it is unclear as to which types of facilities the second bullet point would relate to and whether it would be consistent with NPPF paragraph 97.</p> <p>It should also be noted that the Plan makes references to the a Playing Pitch Strategy which was completed in early 2018. The document should be kept up to date to be considered to be a sound.</p>	<p><b>Suggested changes:</b> Proposed change to to change "playing pitches" to "playing fields".</p>	<p><b>Officer comments:</b> Minor modification of Policy 23 proposed to change "playing pitches" to "playing fields".</p>
<p><b>Representation reference:</b> 249/1/3</p> <p><b>Name:</b> Sport England</p>	<p><b>Refers to:</b> Policy 23</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b></p> <p>Policy 23 should refer to playing fields and not playing pitches. Possibly define types of facilities.</p> <p>It should also be noted that the Plan makes references to the a Playing Pitch Strategy which was completed in early 2018. The</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	document should be kept up to date to be considered to be a sound.		
<b>Representation reference:</b> 197/1/4  <b>Name:</b> Northamptonshire County Council	<b>Refers to:</b> Policy 25	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> The County Council welcomes inclusion of Policy 25 – Childcare Provision which seeks to ensure the sufficient supply of childcare, including for pupils of Early Years education age, is strategically managed. The background to the policy notes that whilst some areas indicate a current sufficiency of supply, this is likely to be impacted as housing delivery accelerates throughout the plan period. Furthermore, as a result of parents opting to select providers closer to workplaces than their homes for convenience, the pattern of demand may not always relate directly to the location of new housing development, but may also be attributed to new commercial schemes coming forward.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 197/1/5  <b>Name:</b> Northamptonshire County Council	<b>Refers to:</b> Policy 25	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> It will therefore be necessary for all new major development to be assessed in relation to impact on Early Years provision, and in cases where there is an expected shortfall in places as a result of development, then s106 developer contributions may be necessary to ensure sufficient additional places can be provided. The text of Policy 21 should therefore be amended to recognise this.	<b>Suggested changes:</b> The text of Policy 21 should therefore be amended to recognise this.	<b>Officer comments:</b> This requirement is covered in policy 37.
<b>Representation reference:</b> 163/1/3  <b>Name:</b> Ann Plackett	<b>Refers to:</b> Policy 26	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> Although the revised policy recognises the need for an ecological assessment, it does not recognise the need for a management plan to protect/ enhance the biodiversity interest of the Kingsthorpe site, as set out in my original	<b>Suggested changes:</b> The following change is proposed: 'Ecological assessments should	<b>Officer comments:</b> There is no evidence to suggest that a management plan is essential to the

		Plan is unsound: - not effective - not consistent with national policy	representation. This will need to address the protection of the badger set and fox den, as well as the retention of some of the old grassland. The preparation of a management plan would be in line with the NPPF 2019 paragraphs 174b) and 175d). As well as protecting the biodiversity interest of the proposed extension, there is scope for improving the biodiversity of the previous extension onto the former allotments.	be carried out ahead of any applications on these sites due to local wildlife sites and habitats present / in close proximity to the sites. Proposals for extended cemeteries should be sensitive to ensure there is no harm to biodiversity .....and management plans should be prepared to protect and achieve a net gain in biodiversity on the proposed extensions and within the existing burial sites.'	production of an ecological assessment. No modification required.
<b>Representation reference:</b> 241/1/7  <b>Name:</b> British Horse Society	<b>Refers to:</b> para. 10.4	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Historic landscapes - Public Rights of Way are largely historical routes which require maintenance and enhancement for the benefit of all user groups. Determining under-recorded routes before the 1 January 2026 cut-off date is imperative to improve the network and opportunities for walkers, cyclists and pedestrians to choose active leisure pursuits.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 75/1/11	<b>Refers to:</b> Policy 27	<b>Legal compliance and soundness:</b>	<b>Comments:</b>	<b>Suggested changes:</b> We therefore feel that this policy	<b>Officer comments:</b> Policy 27 of the LPP2 requires

<p><b>Name:</b> Town Centre Conservation Area Advisory Committee</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>We note that the NPPF (170(d)) requires planning policies and decisions to enhance the local and natural environment by minimising impacts and providing net gains in biodiversity.</p>	<p>should be strengthened, by amending the first sentence of paragraph 2 to: “All housing developments of 15 dwellings or more will be expected to deliver a net gain in biodiversity, and to deliver and / or contribute to the green infrastructure projects.”</p>	<p>development to contribute to Green Infrastructure projects. Policy 29 of the LPP2 requires development of offset the loss and secure a net gain in biodiversity. No modification required.</p>
<p><b>Representation reference:</b> 229/1/24</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 27</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The policy does not afford the ability to consider large scale Sustainable Urban Extension’s need to provide bespoke/tailored open spaces that form Green Infrastructure. There may well be the need to provide more quantum of one particular type of open space compared to other typologies on large SUEs. For example, there maybe a need to provide general amenity open space above the quantum required in order to avoid occupants of the Development travelling to wooded areas that are covered under SPAs, but the amount of play space could be offset if there is an abundance of playing fields close by.</p>	<p><b>Suggested changes:</b> The policy needs to be more explicit in what forms of connectivity are expected from an application to “improve connectivity” as this can undermine the viability of a project.</p>	<p><b>Officer comments:</b> The NPPF is clear throughout that Green Infrastructure (GI) is required to mitigate impacts of climate change and to promote health and wellbeing. Specific GI Projects are outlined in the Northampton GI Plan. On developments of 15 or above applicants should demonstrate how they will deliver / contribute to GI projects. No</p>

					modification required.
<p><b>Representation reference:</b> 229/1/25</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 27</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The policy states that all housing Developments of 15 dwellings or more will be expected to deliver and/or contribute to the green infrastructure projects. A brownfield site of 15 or more dwellings within an urban area could not be expected to deliver a green infrastructure project and a question of reasonableness will need to be applied if it needs to contribute towards GI projects.</p> <p>The policy is not effective as it doesn't have the ability to consider what bespoke/tailored open spaces that form GIs might be required for large scale SUEs. The policy has not justified why there needs to be a contribution to green infrastructure projects at a trigger of 15 or more dwellings and is also not effective in this regard, because it hasn't considered the likelihood that brownfield sites could occur within an urban area where physical provision would be difficult.</p>	<p><b>Suggested changes:</b> Modification to the policy: ".. Will be expected to deliver and or contribute to the green infrastructure, where required to do so, through negotiations with the Council and the Applicant. "A green infrastructure strategy/plan to illustrate how green infrastructure is integrated within the Development can include x,y,z, types of open spaces. The Council will assess the merits of this strategy, in relation to:- • the physical ability to connectivity to the existing Local Green Infrastructure</p>	<p><b>Officer comments:</b> The NPPF is clear throughout that Green Infrastructure (GI) is required to mitigate impacts of climate change and to promote health and wellbeing. Specific GI Projects are outlined in the Northampton GI Plan. On developments of 15 or above applicants should demonstrate how they will deliver / contribute to GI projects. No modification required.</p>

				<ul style="list-style-type: none"> <li>• the landownership requirements to connect to existing Local Green Infrastructure</li> <li>• the scale of development and</li> <li>• the implications upon the viability of the scheme”</li> </ul>	
<p><b>Representation reference:</b> 113/1/22</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 28</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> We do not believe the Plan to be justified by evidence or effective in dealing with Sports pitches and amenity space, specifically in relation to the following policies: Policy 6 – Health and Wellbeing, Policy 23 – Sports facilities, and playing pitches Policy 28 – Providing open space East Hunsbury is an area without sports pitches and future developments should be required to make provision for community access. There are many in our community who are, or have been, members of Welland Valley Football Club over the years, and the parish council are concerned that the location of the football pitches (off of Ladybridge Drive (Wootton Brook) is not classified as Amenity Green Space. The land has been used as pitches for a number of years and is a prime example of an area of land which should be maintained as amenity green space. The Parish Council would expect that any planning application for development of sites within East Hunsbury would include provision of open space, sports and recreation facilities, and suitable measures to ensure the maintenance of these spaces for the future. The use of management companies has created an unnecessary burden for residents in other areas, and other ways of managing open space should be encouraged.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 seeks to encourage healthy lifestyles through a variety of policies (6, 23 and 28). Policy 23 sets out that development resulting in the loss the loss of existing sports related community facilities, which is well used and valued, will only be acceptable if adequate alternative provision exists. Policy 28 of the LPP2 requires new major development to sustain or enhance open spaces, and contribute to open space provision as</p>

					set out in the standards in Policy 28. It is agreed that there is evidence to suggest that the area in Welland Valley FC (Off Ladybridge Drive) should be designated as Amenity Green Space. Modify the Policies Map accordingly.
<b>Representation reference:</b> 226/1/3  <b>Name:</b> Brian Oldham	<b>Refers to:</b> The Plan, policies map and new classification	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> I would request that the land on the Policies Map immediately adjacent to Policies LAA 1140, LAA 1025, and LAA 1122, should be registered as Classified and not Unclassified as the map illustrates.  This piece of land has football pitches on it which are still in use, and is also used as a Community Space for sporting events for the immediate and wider Community at large and should be protected as such.  Therefore I would strongly urge that the Local Plan - Part 2 for this piece of land is modified to read as Classified and not Unclassified.	<b>Suggested changes:</b> 1 would request that the land on the Policies Map immediately adjacent to Policies LAA 1140, LAA 1025, and LAA 1122, should be registered as Classified and not Unclassified as the map illustrates.	<b>Officer comments:</b> The policies map will be updated accordingly.
<b>Representation reference:</b> 244/1/24  <b>Name:</b> Bastion Group	<b>Refers to:</b> Policy 28	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Bastion support this policy and the provision of requisite open space as part of development given the value green infrastructure provides for sustainability, ecology, landscape integration, drainage as well as for health and well-being. However, Bastion also acknowledge that different scales of	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.



			<p>development and sites will better accommodate different types of open space. From a management and maintenance perspective, higher order public open spaces need to be of a certain scale to facilitate effective management regimes. In this context, Bastion fully support the reference to contributing towards offsite provision where standards cannot be met on site and consider this is vital to the soundness of this policy.</p> <p>It is also important to ensure that accessibility standards and considered alongside quantity standards as Northampton has a wealth of excellent parks and open spaces and it is essential that their use is maximised to support their ongoing maintenance and management. Accessibility to existing spaces should be taken into account in determining whether on-site provision is necessary for small / medium scale development.</p>		
<p><b>Representation reference:</b> 30/1/2</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> Section 2: I was pleased to note that the policy describes a hierarchy of sites and biodiversity assets. However the list does not include Potential Wildlife Sites (PWS) or Local Geological Sites. Some PWS are former Local Wildlife Sites (LWS) which have deteriorated and at last survey date no longer qualified. Others are sites which are suspected to have some biodiversity value but have not been surveyed. PWS are not usually of the same ecological quality as LWS but occasionally surveys have revealed them to be of as much as SSSI quality. Applicants need to know PWS exist and may have significant value so should be included in Policy 29.</p> <p>The term 'undesigned sites' is not particularly meaningful in biodiversity terms (unlike undesigned heritage assets). I would suggest the term 'other biodiversity assets', which would reflect terminology used in the Biodiversity SPD.</p>	<p><b>Suggested changes:</b> Section 2: I was pleased to note that the policy describes a hierarchy of sites and biodiversity assets. However the list does not include Potential Wildlife Sites (PWS) or Local Geological Sites. Some PWS are former Local Wildlife Sites (LWS) which have deteriorated and at last survey date no longer qualified. Others are sites</p>	<p><b>Officer comments:</b> It is agreed Policy 29 should include reference to Potential Wildlife Sites and there should be an alteration to wording of Policy 29 to remove 'undesigned sites' and replace with 'Other biodiversity assets'.</p>

				<p>which are suspected to have some biodiversity value but have not been surveyed. PWS are not usually of the same ecological quality as LWS but occasionally surveys have revealed them to be of as much as SSSI quality. Applicants need to know PWS exist and may have significant value so should be included in Policy 29.</p> <p>The term 'undesigned sites' is not particularly meaningful in biodiversity terms (unlike undesignated heritage assets). I would suggest the term 'other biodiversity assets', which would reflect terminology used in the Biodiversity SPD.</p>	
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<p><b>Representation reference:</b> 30/1/3</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> Section 3: This section refers to cumulative impacts, which must be considered in development subject to Environmental Impact Assessment (EIA) and the Habitats Regulations. I question whether the council has the authority to require consideration of cumulative impacts for development which is not subject to the EIA or Habitats Regulations.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> It is agreed the wording of Policy 29 should be altered to include wording in brackets () and removal of wording in []: All applicants are expected to assess the impacts of their proposals on biodiversity, (and) [including] indirect impacts such as recreational activities, [in combination impact of developments and any potential effects on functionally linked land to the respective site].</p>
<p><b>Representation reference:</b> 30/1/4</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> Similarly, this section also refers to impacts on functionally linked land, which is specific to the Special Protection Area and should not be included in a general biodiversity policy.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> It is agreed the wording of Policy 29 should be altered to include wording in brackets () and removal of wording in []: All applicants are expected to assess the impacts of their</p>

					proposals on biodiversity, (and) [including] indirect impacts such as recreational activities, [in combination impact of developments and any potential effects on functionally linked land to the respective site].
<p><b>Representation reference:</b> 30/1/5</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> The remainder of this section is confusing, and I would reiterate my comments on the previous draft local plan: applicants are not all expected to conduct ecological surveys as the wording implies. Applicants are expected to consult the Biodiversity SPD to find out whether and what surveys might be necessary. This requirement could be included in the policy as has been done in the North Northamptonshire Joint Core Strategy (Policy 4), which states that ‘development proposals will need to take account of the Northamptonshire Biodiversity Supplementary Planning Document...’ If this section is intended to refer to development affecting the SPA then this should clearly be indicated in the policy wording. As currently worded section 3 appears to apply to all development.</p>	<p><b>Suggested changes:</b> The remainder of this section is confusing, and I would reiterate my comments on the previous draft local plan: applicants are not all expected to conduct ecological surveys as the wording implies. Applicants are expected to consult the Biodiversity SPD to find out whether and what surveys might be necessary. This requirement could be included in the policy as has been done in the North</p>	<p><b>Officer comments:</b> It is agreed that the wording of Policy 29 should be altered to include wording in brackets (): ...Applicants will be required to (consider the the Northamptonshire Biodiversity SPD or sucessor document and where necessary) undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards.</p>

				Northamptonshire Joint Core Strategy (Policy 4), which states that 'development proposals will need to take account of the Northamptonshire Biodiversity Supplementary Planning Document...' If this section is intended to refer to development affecting the SPA then this should clearly be indicated in the policy wording. As currently worded section 3 appears to apply to all development.	
<p><b>Representation reference:</b> 30/1/12</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> Overall while I believe the biodiversity policies have been improved they do appear to have been developed with limited ecological/natural environment input; they read as if they were written by non-specialists. It is crucial that these policies – and all policies in the local plan – are able to be used and delivered by officers. The wording must be clear and precise, and in my view Policies 29 and 30 in particular are not quite there yet.</p>	<p><b>Suggested changes:</b> Noted.</p>	<p><b>Officer comments:</b> The formulation of policies within the Local Plan have been formulated in partnership with neighbouring authorities, statutory bodies, comments from the general public and</p>

					from the Council's evidence base.
<p><b>Representation reference:</b> 30/1/15</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b></p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b></p> <p>Policy 29 Supporting and enhancing biodiversity</p> <p>Section 1: The proposed wording is not consistent with the wording or principle of paragraph 175 of the NPPF. Paragraph 175 establishes the mitigation hierarchy which requires development to 'avoid, adequately mitigate, or, as a last resort, compensate' biodiversity impacts. Policy 29 1) would require development to 'offset the loss', which presupposes biodiversity impacts and skips the 'avoid' and 'mitigate' stages of the mitigation hierarchy.</p> <p>Section 2: The list of designated sites does not include Potential Wildlife Sites (PWS) or Local Geological Sites. Some PWS are former Local Wildlife Sites (LWS) which have deteriorated and at last survey date no longer qualified. Others are sites which are suspected to have some biodiversity value but have not been surveyed. PWS are not usually of the same ecological quality as LWS but occasionally surveys have revealed them to be of as much as SSSI quality. Applicants need to know PWS exist and may have significant value so should be included in Policy 29.</p> <p>Section 3: This section refers to cumulative impacts, which must be considered in development subject to Environmental Impact Assessment (EIA) and the Habitats Regulations. I question whether the council has the authority to require consideration of cumulative impacts for development which is not subject to the EIA or Habitats Regulations. Similarly, this section also refers to impacts on functionally linked land, which is specific to the Special Protection Area and should not be included in a general biodiversity policy.</p> <p>Policy 30 Upper Nene Valley Gravel Pits Special Protection Area The commitment to prepare a mitigation strategy for the SPA is included in the supporting text only (paragraph 10.17): this should be included in the actual policy text.</p>	<p><b>Suggested changes:</b> See other comments.</p>	<p><b>Officer comments:</b> See responses to individual comments.</p>

			<p>Policy 38 Development allocations As described above it appears that at least some of the proposed allocations were not informed by the ecological evidence base, which includes designated sites</p> <p>Policy 41 The Green, Great Houghton (LAA1098) The seventh bullet refers to a buffer but does not indicate what is to be buffered, only where the buffer is to be located. I think some clarification is needed on this point for the policy to be deliverable by case officers.</p>		
<p><b>Representation reference:</b> 53/1/8</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Policy 29 - Supporting and enhancing biodiversity Anglian Water welcomes the reference to development proposals providing a net gain in biodiversity.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 172/1/6</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> As currently drafted the policy and supporting table refer to proposal offsetting loss of biodiversity. 'Offsetting' implies an offsite solution, yet it is often possible to deliver net gain on the same site. As such, the policy and supporting table in the plan do not meet the test of soundness through inconsistency with national policy which requires plans planning policies and decisions to contribute to and enhance the natural and local environment including by minimising impacts on and providing net gains for biodiversity (NPPF, 2019 Paragraph 170d).</p>	<p><b>Suggested changes:</b> The policy and table should be reworded as follows: POLICY 29 SUPPORTING AND ENHANCING BIODIVERSITY 1. The Council will require all major development proposals [to secure a net gain] in biodiversity through the strengthening,</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to the plan will clarify the policy. Modify Policy 29 to remove 'offset the loss and': The Council will require all major development proposals to secure a net gain in biodiversity through the strengthening, management and / or creation of new</p>

				<p>management and / or creation of new habitats. This should be measured through the use of a recognised biodiversity calculator. Proposals will be expected to incorporate measures to enhance biodiversity within or around a development site, and to contribute to the consolidation and development of local ecological networks, including beyond the borough's boundary. Development should avoid the fragmentation of habitats and links and address the Northamptonshire Biodiversity Action Plan local priorities for habitats and species.</p>	<p>habitats. This should be measured through the use of a recognised biodiversity calculator. Proposals will be expected to incorporate measures to enhance biodiversity within or around a development site, and to contribute to the consolidation and development of local ecological networks, including beyond the borough's boundary. Development should avoid the fragmentation of habitats and links and address the Northamptonshire Biodiversity Action Plan local priorities for habitats and species.</p> <p>Amend Table 12 to include wording in brackets:</p>
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				Table 12: Indicator: Biodiversity net gain Target: [Major developments must secure a net gain in biodiversity] Main Policy delivered: 29	Indicator: Biodiversity net gain Target: Major developments must secure a net gain in biodiversity Main Policy delivered: 29
<p><b>Representation reference:</b> 200/1/42</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 29 requires all major development proposals to offset the loss and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats. This should be measured through the use of a recognised biodiversity calculator. Proposals will be expected to incorporate measures to enhance biodiversity within or around a development site, and to contribute to the consolidation and development of local ecological networks, including beyond the Borough's boundary.</p> <p>The 2019 NPPF states that policies should be clearly written and unambiguous (para 16) so that both applicants and decision makers know how to react. The Council's policy approach should reflect the Government's proposals on biodiversity gain set out the Environment Bill. The Government will use the DEFRA Biodiversity Metric to measure changes to biodiversity under net gain requirements established in the Environment Bill. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays.</p> <p>The Government is committed to continued engagement with the housebuilding industry to address concerns and risks. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The Viability Assessment of the LPP2 has considered the requirements of Policy 29. No modification required with regards to this matter. It is agreed that a proposed modification to the plan will clarify Policy 29. Modify Policy 29 to include DEFRA Biodiversity Metric.</p>

			<p>housebuilding industry in order that net gain does not prevent, delay or reduce housing delivery. The significant additional costs for biodiversity gain should be fully accounted for in the Council's viability assessment. The DEFRA Biodiversity Net Gain &amp; Local Nature Recovery Strategies : Impact Assessment Table 14 : Net Gain Delivery Costs (Residential) sets out regional costs (based on 2017 prices) in East Midlands of £19,951 per hectare of development based on a central estimate but there are significant increases in costs to £69,522 per hectare for off-site delivery under Scenario C. These costs are not included in the Council's viability assessment. There may also be an impact on gross / net site acreage ratio.</p> <p>The Government will make provision in the Environment Bill to set a transition period of two years. The Government will work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, and will provide clear and timely guidance on understanding what will be required and when.</p>		
<p><b>Representation reference:</b> 229/1/26</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> By the time the Local Plan Part 2 becomes adopted, the Environmental Bill will be made.</p> <p>This policy makes no reference to s. (90) part 6 of the impending Environmental Bill, which makes provision for biodiversity gain to be a condition of a planning permission (planning permission taken in the sense of s.57 of the Town and Country Planning Act). It would, therefore, be questionable as to whether the information required in this policy is necessary at application stage. There is the ability in the Environmental Bill for the Secretary of State to make arrangements in legislation for the Applicant to purchase a credit from the SOS for the purpose of meeting the biodiversity gain.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 29 does not state at what stage in the planning process an applicant should demonstrate a net gain in biodiversity, only that all major development proposals will need to offset the loss and secure a net gain in biodiversity. As the Environment Bill progresses and</p>

			Will NBC publish a Bio-diversity Land Register to which bio-diversity offsetting can occur?		further guidelines are produced NBC will make decisions on Biodiversity Land Registers at that stage. No modification required.
<p><b>Representation reference:</b> 229/1/27</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The Bill also refers to a local habitat map s.93(i) which will cover the whole strategy area or two or more local habitat maps. Has there been any cross boundary work on identifying what area the maps will cover? Presumably there will be a Bio-diversity SPD to accompany the Local Plan. The policy is not consistent with the impending legislation and no commentary has been provided which refers to cross boundary working and co-operation with neighbouring authorities with regard to bio-diversity.</p>	<p><b>Suggested changes:</b> Modification The policy needs to incorporate the principles of the Environmental Bill and refer to the ability of bio-diversity offsetting and for the Applicant to purchase credits for the purposes of meeting bio-diversity gain.</p>	<p><b>Officer comments:</b> NBC has an adopted Biodiversity SPD for Northamptonshire and Habitat Opportunity maps that link across boundaries. The LPP2 reflects the provisions of the Environment Bill. No modification required.</p>
<p><b>Representation reference:</b> 246/1/3</p> <p><b>Name:</b> Natural England</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 29 wording requires revision and strengthening. Point 1 and 2 within the policy are confusing.</p> <p>Whilst we welcome the inclusion of biodiversity net gain, for clarity we recommend a separate point within the policy addressing biodiversity net gain. Please note that biodiversity net gain compliments the mitigation hierarchy, it does not replace it. We would also recommend a reference to using the DEFRA biodiversity metric.</p>	<p><b>Suggested changes:</b> We would therefore recommend that the mitigation hierarchy is detailed within this policy, please refer to paragraph 175 of the NPPF.</p>	<p><b>Officer comments:</b> It is agreed that the following changes should be made to Policy 29 to include the following: The Council will require all major development proposals to avoid, adequately mitigate, or, as a last resort,</p>

			It is important that the policy clearly distinguishes the mitigation hierarchy from any biodiversity net gain requirements. This will help to set a transparent and auditable context within which developers can both assess their impacts and provide net gain.		compensate biodiversity impact and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats. Biodiversity net gain should be measured through the use of a recognised biodiversity calculator such as the Defra metric.
<b>Representation reference:</b> 246/1/4  <b>Name:</b> Natural England	<b>Refers to:</b> Policy 29	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective - not consistent with national policy	<b>Comments:</b> We also suggest the policy directs developers to the Northamptonshire Biodiversity SPD.	<b>Suggested changes:</b> We also suggest the policy directs developers to the Northamptonshire Biodiversity SPD.	<b>Officer comments:</b> Policy 29 has been amended to include reference to the Northamptonshire Biodiversity SPD.
<b>Representation reference:</b> 246/1/5  <b>Name:</b> Natural England	<b>Refers to:</b> Policy 29	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective - not consistent with national policy	<b>Comments:</b> The policy does not reflect the wording referred to within the Habitat Regulations Assessment Report, June 2020, "Development, whether individually or in combination, having an adverse effect on the integrity of the Upper Nene Valley Gravel Pits will be refused" This wording would be welcomed within Policy 29 and Policy 30.	<b>Suggested changes:</b> The policy does not reflect the wording referred to within the Habitat Regulations Assessment Report, June 2020, "Development, whether	<b>Officer comments:</b> The following wording in brackets [] has been removed from Policy 29. All applicants are expected to assess the impacts of their proposals on biodiversity,

				individually or in combination, having an adverse effect on the integrity of the Upper Nene Valley Gravel Pits will be refused” This wording would be welcomed within Policy 29 and Policy 30.	including indirect impacts such as recreational activities, [the cumulative impact of developments] and any potential effects on the functionally linked land.
<p><b>Representation reference:</b> 251/1/22</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 29</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 29(1) proposed the following requirement: ‘The Council will require all major development proposals to offset the loss and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats. This should be measured through the use of a recognised biodiversity calculator. Proposals will be expected to incorporate measures to enhance biodiversity within or around a development site, and to contribute to the consolidation and development of local ecological networks, including beyond the borough’s boundary.’ NPPF Paragraph 16 states that policies should be ‘clearly written and unambiguous, so it is evident how a decision maker should react to development proposals’. The Council’s policy approach should reflect the Government’s proposals on biodiversity gain as set out the Environment Bill which proposes to utilise the DEFRA Biodiversity Metric to measure changes to biodiversity under net gain requirements. Such a mandatory requirement offers applicants a level playing field nationally and reduces the risk of unexpected cost and delay.</p>	<p><b>Suggested changes:</b> Make reference to the DEFRA Biodiversity Metric.</p>	<p><b>Officer comments:</b> It is agreed that reference to the Biodiversity Metric is acceptable. Modify Policy 29 accordingly.</p>

<p><b>Representation reference:</b> 185/1/3</p> <p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>	<p><b>Refers to:</b> para. 10.16</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted. The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p><b>Suggested changes:</b> The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p><b>Officer comments:</b> The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>
<p><b>Representation reference:</b> 185/1/4</p> <p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>	<p><b>Refers to:</b> para. 10.17</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted.</p>	<p><b>Suggested changes:</b> The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p><b>Officer comments:</b> The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>

<p><b>Representation reference:</b> 185/1/5</p> <p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>	<p><b>Refers to:</b> para. 10.18</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted.</p>	<p><b>Suggested changes:</b> The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p><b>Officer comments:</b> The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>
<p><b>Representation reference:</b> 185/1/7</p> <p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>	<p><b>Refers to:</b> para. 10.20</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted.</p>	<p><b>Suggested changes:</b> The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p><b>Officer comments:</b> The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>
<p><b>Representation reference:</b> 185/1/8</p>	<p><b>Refers to:</b></p>	<p><b>Legal compliance and soundness:</b></p>	<p><b>Comments:</b></p>	<p><b>Suggested changes:</b></p>	<p><b>Officer comments:</b></p>

<p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>	<p>para. 10.21</p>	<p>Plan is legally compliant.  Plan is sound.</p>	<p>This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted.</p>	<p>The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p>The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>
<p><b>Representation reference:</b> 30/1/6  <b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI  Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> The commitment to prepare a mitigation strategy for the SPA is included in the supporting text only (paragraph 10.17): this should be included in the actual policy text.</p>	<p><b>Suggested changes:</b> The commitment to prepare a mitigation strategy for the SPA is included in the supporting text only (paragraph 10.17): this should be included in the actual policy text.</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification would confirm the Council's commitment to the mitigation strategy. Amend Policy 30 to include: The Local Planning Authority or successor authority will prepare a Mitigation Strategy document concerning the Upper Nene Valley Gravel Pits Special Protection Area with</p>



					a view to its subsequent adoption as an Addendum to the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document within 12 months of the adoption of the Part 2 Plan.
<p><b>Representation reference:</b> 30/1/7</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> I question the inclusion of pet predation in the second paragraph of this policy. As stated in the updated HRA report, pet predation is a separate issue from the off-lead dogs which are thought to be the primary source of disturbance to the site's birds. Pet predation is more likely a problem for nesting birds than it is for overwintering birds. As the SPA was classified for overwintering birds I am not convinced that references to pet predation belong in this policy. However I will of course defer to Natural England's judgement on this matter.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> It is agreed that a minor modification, removing the reference to ped predation, will clarify the policy. Amend Policy 30 to remove wording in []: Applications comprising a net gain in residential units within 3 km of the Upper Nene Valley Gravel Pits SPA and Ramsar site will need to demonstrate that the impact of any increased recreational activity [or pet predation] (indirect or direct)</p>

					on the SPA and Ramsar site will not have a detrimental impact.
<p><b>Representation reference:</b> 30/1/8</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> The list of possible significant effects in the third paragraph is not policy and in my view does not belong here; I would suggest moving it to the supporting text.</p>	<p><b>Suggested changes:</b> The list of possible significant effects in the third paragraph is not policy and in my view does not belong here; I would suggest moving it to the supporting text.</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to remove the wording in [] in Policy 30 and place in supporting text would help clarify the policy: Proposals for major developments within close proximity of the SPA will need to demonstrate through the development management process that there will be no adverse effects on the integrity of the Special Protection Area and the species for which the land is designated. [Significant effects could include the loss or fragmentation of supporting habitat, non-physical</p>

					disturbance (noise, vibration or light), and impacts due to water runoff, water abstraction or discharges from the foul drainage system either as a direct result of the development alone or in combination]. Applicants should refer to Table 2 of the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document for guidance on when to consult with Natural England.
<p><b>Representation reference:</b> 30/1/13</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> Overall while I believe the biodiversity policies have been improved they do appear to have been developed with limited ecological/natural environment input; they read as if they were written by non-specialists. It is crucial that these policies – and all policies in the local plan – are able to be used and delivered by officers. The wording must be clear and precise, and in my view Policies 29 and 30 in particular are not quite there yet.</p>	<p><b>Suggested changes:</b> Noted.</p>	<p><b>Officer comments:</b> The formulation of policies within the Local Plan have been formulated in partnership with neighbouring authorities, statutory bodies, comments from the general public and from the Council's evidence base.</p>

<p><b>Representation reference:</b> 53/1/9</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Policy 30 Upper Nene Valley Pits Special Protection Area - OBJECT (in part) - EFFECTIVE</p> <p>We note that Policy 30 has been amended to require major development proposals demonstrating that there would be no significant adverse effects on Upper Nene Valley Gravel Pits Special Protection Area and Ramsar site as a result of development proposals or cumulatively including from (additional) water abstraction and discharge from the foul drainage system.</p> <p>Anglian Water is supportive of the objective of the request for the modification to protecting the water environment particularly in relation to Upper Nene Valley Gravel Pits Special Protection area.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 53/1/10</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Water abstraction: we consider the reference to water abstraction is ineffective and unnecessary as water abstractions for public water supply are licensed by the Environment Agency and form part of the Water Resource Management Plan process rather than the determination of individual planning applications.</p> <p>Anglian Water is the water undertaker for Northampton Borough administrative area and is responsible for preparing as part of a statutory process a Water Resources Management plan (WRMP) at least once every 5 years and reviewed continuously which outlines how we will manage the supply/demand balance so that we can continue to serve our customers now and in the future in respect of population growth, climate change and environmental protection. Anglian Water's current WRMP 2019 covers the period 2020 to 2045 and has been approved by Defra.</p> <p>The WRMP is supported by a Habitats Regulation Assessment report and where necessary an Appropriate Assessment and is available to view at the following address:</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			<p><a href="https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/">https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/</a></p> <p>Water resources are managed on a larger geographical scale than Councils and individual development proposals. For example the Ruthamford North Water Resource Zone (WRZ) includes Northampton Borough together with the supply systems for Peterborough, Wellingborough, Corby, Daventry and Kettering.</p> <p>The Environment Agency issues licenses to Anglian Water for the abstractions from both groundwater and surface water sources used for public water supply. As such the Environment Agency is the decision maker in respect of any changes to abstraction licenses in accordance with separate legislation (environmental permitting regulations) and directs Anglian Water where it is necessary to limit abstractions to protect water environment.</p> <p>Anglian Water is working closely with the Environment Agency (and Natural England) to ensure that our abstractions are sustainable. Abstraction in all areas where there is any risk of environmental deterioration will be capped at recent abstraction rates, and hence abstraction will not increase. This includes the Northampton Borough area.</p> <p>Water resources are sourced from across Anglian Water company area and water is conveyed between different areas by existing infrastructure. It is proposed that we will build on existing infrastructure by developing a more integrated strategic grid so that we can continue to serve our customers as part of the WRMP proposals. As part of which there will be a new potable water transfer is proposed from Lincolnshire to Ruthamford North WRZ.</p> <p>Anglian Water is also actively working with Water Resource East a partnership which brings together a range of organisations with an interest in water, energy, retail environment, land management and agriculture to develop a long-term, multi-sector water resource strategy for the East of England.</p>		
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<p><b>Representation reference:</b> 53/1/11</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b></p> <p>There is a robust regulatory framework in place to ensure that abstractions are effectively managed. New development, or rather population change, is one of many drivers for water resource management.</p> <p>The Council's HRA report also concludes that there will be no adverse effects on the integrity of Upper Nene Valley Gravel Pits SPA and Ramsar site, as a result of changes to water supply and water level management either alone or in combination with other plans or projects (para 5.137 of the report). We also have concerns about requiring major development proposals located within close proximity to Upper Nene Valley SPA in relation to foul drainage.</p> <p>All new development proposals in Northampton Borough would be expected to be drained to Northampton (Great Billing) Water Recycling Centre and the related discharge point for this site is managed by Anglian Water in accordance with the permit issued by the Environment Agency.</p> <p>Policy BN7A of the adopted West Northamptonshire Core Strategy states 'that new development proposals will ensure that adequate and appropriate....wastewater infrastructure is available to meet the additional requirements placed upon it and ensure that water quality is protected, and as far as practicable, improved.' As the Development Plan will be read as a whole there is an existing local plan policy that requires developers to demonstrate that there is adequate capacity available to ensure water quality is protected.</p>	<p><b>Suggested changes:</b></p> <p>It is therefore proposed that Policy 30 is amended as follows - remove wording in brackets: 'Proposals for major developments within close proximity of the SPA will need to demonstrate through the development management process that there will be no adverse effects on the integrity of the Special Protection Area and the species for which the land is designated. Significant effects could include the loss or fragmentation of supporting habitat, non-physical disturbance (noise, vibration or light), and impacts due to</p>	<p><b>Officer comments:</b></p> <p>It is agreed that the proposed modification will clarify the policy. It is recommended that Policy 30 be modified as follows - remove wording in brackets [] and include wording in {}.</p> <p>'Proposals for major developments within close proximity of the SPA will need to demonstrate through the development management process that there will be no adverse effects on the integrity of the Special Protection Area and the species for which the land is designated. Significant effects could include the loss or fragmentation of supporting habitat, non-physical</p>
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				<p>water runoff, (water abstraction or discharges from the foul drainage system) either as a direct result of the development alone or in combination. Applicants should refer to Table 2 of the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document for guidance on when to consult with Natural England.</p> <p>INCLUDE: Major developments will also be required to demonstrate that there is sufficient capacity at the receiving Water Recycling Centre to ensure water quality is protected consistent with the requirements of the Habitats Directive.</p>	<p>disturbance (noise, vibration or light), and impacts due to water runoff, [water abstraction or discharges from the foul drainage system] either as a direct result of the development alone or in combination. {Major developments will also be required to demonstrate that there is sufficient capacity at the receiving Water Recycling Centre to ensure water quality is protected consistent with the requirements of the Habitats Directive.} Applicants should refer to Table 2 of the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document for guidance on when to consult with Natural England.</p>
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<p><b>Representation reference:</b> 185/1/9</p> <p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted.</p>	<p><b>Suggested changes:</b> The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p><b>Officer comments:</b> The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>
<p><b>Representation reference:</b> 239/2/12</p> <p><b>Name:</b> Duncan Investments Ltd - Houghton Gate</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Duncan Investments Ltd would like to take this opportunity to note that the implications of the Upper Nene Valley Gravel Pits SPA on the Houghton Gate site are currently being assessed by the site promoters in consultation with Natural England but there is no in principle objection to the development of the site subject to agreement on development scale and mitigation. Furthermore, migrating bird surveys carried out over the winter of 2018/2019 show that the site does not constitute supporting habitat.  As the northern part of the site falls within the 250m SPA Buffer Zone, Natural England has advised that building heights in this northern area would be restricted and therefore this area will be the focus of open storage uses, site infrastructure, landscaping, drainage and biodiversity enhancement measures.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Policy 30 of the LPP2 relates to the Upper Nene Valley Gravel Pits SPA and Ramsar site and sets out how proposals will need to demonstrate no adverse impact on the SPA. In particular, new development within a 250m zone of the SPA must undertake an assessment to demonstrate that it will not have a significant adverse</p>



					effect on birds within the area or, if directly adjacent to existing buildings, should reflect building heights. NBC requests to see any assessment(s) undertaken so far that have been shared with Natural England including overwintering bird surveys.
<p><b>Representation reference:</b> 239/2/13</p> <p><b>Name:</b> Duncan Investments Ltd - Houghton Gate</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> 4.5 The explanatory text to Policy 30 notes that new housing within 3km of the SPA has increased recreational pressure, contributing to disturbance and decline in bird species which form the SPA qualifying features. As such, there is a need to ensure that increased recreational pressure on the SPA resulting from housing growth is addressed [para 10.18]. The allocation of the Houghton Gate site for employment development will help to assist in addressing this recreational pressure by reducing opportunities for residential development in close proximity to the site.</p>	<p><b>Suggested changes:</b> For the above reasons, it is considered that the Houghton Gate site can be delivered in accordance with the requirements of Policy 30. A full assessment of the impacts of any scheme on the site and appropriate mitigation would be undertaken and submitted with a planning application.</p>	<p><b>Officer comments:</b> The site was assessed as not being suitable for allocation. However, if a proposal comes forward, this will be determined through the normal development management process to assess if it conforms to the relevant policies in the development plan.</p>
<p><b>Representation reference:</b> 244/1/25</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> The protection of the SPA is of fundamental importance and is supported by Bastion. It is important however, that this policy recognises that developments should not cause a detrimental</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Any proposal that comes forward which could</p>

<b>Name:</b> Bastion Group		Plan is sound.	impact, including taking account of the provision of appropriate mitigation. It will be necessary for developments with the 3km distance of the SPA to demonstrate that they do not have a detrimental impact under this policy, however, it is acknowledged that this may require securing appropriate mitigation. It is therefore important that the impact on the SPA is assessed as a residual impact, taking account potential mitigation. This should be clarified in the wording of the policy.		potentially affect the SPA will need to demonstrate conformity to Policy 30 of the Plan. No modification required.
<b>Representation reference:</b> 246/1/6  <b>Name:</b> Natural England	<b>Refers to:</b> Policy 30	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective - not consistent with national policy	<b>Comments:</b> The policy does not reflect the wording referred to within the Habitat Regulations Assessment Report, June 2020, "Development, whether individually or in combination, having an adverse effect on the integrity of the Upper Nene Valley Gravel Pits will be refused" This wording would be welcomed within Policy 29 and Policy 30.	<b>Suggested changes:</b> The policy does not reflect the wording referred to within the Habitat Regulations Assessment Report, June 2020, "Development, whether individually or in combination, having an adverse effect on the integrity of the Upper Nene Valley Gravel Pits will be refused" This wording would be welcomed within Policy 29 and Policy 30.	<b>Officer comments:</b> Agreed. Policy 30 has been modified to include the wording in brackets (): Proposals must ensure that there is no adverse impact either alone (or in combination) on the Upper Nene Valley Gravel Pits SPA and Ramsar site.
<b>Representation reference:</b> 246/1/7  <b>Name:</b> Natural England	<b>Refers to:</b> Policy 30	<b>Legal compliance and soundness:</b> Legal compliance: - not specified	<b>Comments:</b> The policy has not included a commitment to produce a mitigation strategy concerning the Upper Nene Valley Gravel Pits SPA. As stated within our previous advice, the mitigation	<b>Suggested changes:</b> This should be written within the policy.	<b>Officer comments:</b> Agreed. Suggested inclusion at the end of Policy 30:

		Plan is unsound: - not effective - not consistent with national policy	strategy must be agreed prior to the adoption of the plan to satisfy Habitat Regulations requirements.		The Local Planning Authority or successor authority will prepare a Mitigation Strategy document concerning the Upper Nene Valley Gravel Pits Special Protection Area with a view to its subsequent adoption as an Addendum to the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document within 12 months of the adoption of the Part 2 Plan.
<b>Representation reference:</b> 246/1/8  <b>Name:</b> Natural England	<b>Refers to:</b> Policy 30	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective - not consistent with national policy	<b>Comments:</b> The policy states “..major development within close proximity of the SPA...” All projects and plans within close proximity of the SPA, are required to demonstrate no significant effect on the SPA, in accordance with the legal requirements of the Habitats Regulations. The policy does not reference the Habitat Regulations or the HRA process. There is also no reference to Upper Nene Valley Gravel Pits SPD.	<b>Suggested changes:</b> The policy states “..major development within close proximity of the SPA...” All projects and plans within close proximity of the SPA, are required to demonstrate no significant effect on the SPA, in	<b>Officer comments:</b> Agreed. Suggested addition to Policy 30 in brackets() and removal of wording in brackets []: Proposals for (all) [major] developments within close proximity of the SPA will need to demonstrate through the

				accordance with the legal requirements of the Habitats Regulations. The policy does not reference the Habitat Regulations or the HRA process. There is also no reference to Upper Nene Valley Gravel Pits SPD.	development management process that there will be no adverse effects on the integrity of the Special Protection Area and the species for which the land is designated (in accordance with the Habitats Regulations and the Upper Nene Valley Gravel Pits Supplementary Planning Document).
<p><b>Representation reference:</b> 246/1/10</p> <p><b>Name:</b> Natural England</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> At times the policy introduces additional unnecessary wording, such as in the third paragraph ‘and the species for which the land is designated’ where the paragraph has already included the test of adverse effects on site integrity (it is not clear what that wording is seeking to achieve).</p>	<p><b>Suggested changes:</b> At times the policy introduces additional unnecessary wording, such as in the third paragraph ‘and the species for which the land is designated’ where the paragraph has already included the test of adverse effects on site integrity (it is not clear what that wording is seeking to achieve).</p>	<p><b>Officer comments:</b> It is seeking to protect the SPA and its associated protected species. No modification required.</p>

<p><b>Representation reference:</b> 246/1/11</p> <p><b>Name:</b> Natural England</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Also we assume that reference to 'close proximity' is meant to mean 'within 3km'.</p>	<p><b>Suggested changes:</b> Also we assume that reference to 'close proximity' is meant to mean 'within 3km'.</p>	<p><b>Officer comments:</b> It is agreed that the policy should be modified to clarify the Council's position. Modify Policy 30 to state that close proximity means that it should be within 3 km.</p>
<p><b>Representation reference:</b> 246/1/12</p> <p><b>Name:</b> Natural England</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Finally, the policy uses the term 'supporting habitat' where in our view the term 'functionally linked land' would be more appropriate to refer to land outside the SPA boundary which supports SPA notified species (such as lapwing and golden plover).</p>	<p><b>Suggested changes:</b> Finally, the policy uses the term 'supporting habitat' where in our view the term 'functionally linked land' would be more appropriate to refer to land outside the SPA boundary which supports SPA notified species (such as lapwing and golden plover).</p>	<p><b>Officer comments:</b> Agree: Change wording in Policy 30 from 'supporting habitat' to 'functionally linked land'.</p>
<p><b>Representation reference:</b> 246/1/15</p> <p><b>Name:</b> Natural England</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Natural England would like to remind your Authority that mitigation measures must offer certainty that they will be successful, and that they are in place and created ahead of the anticipated adverse effect arising. This will ensure that there is no temporal shortfall in habitat availability.</p> <p>Without the Upper Nene Valley Gravel Pits SPA mitigation strategy in place to address recreational pressure by the time of Plan adoption, associated with the lack of detail regarding</p>	<p><b>Suggested changes:</b> Natural England would like to remind your Authority that mitigation measures must offer certainty that they will be successful, and that</p>	<p><b>Officer comments:</b> The issue of SANG can be addressed in the Mitigation Strategy.</p>

			<p>the provision of a SANG, Natural England currently is not confident that mitigation measures will be able to address recreational pressure impacts to the Upper Nene Valley Gravel Pits SPA.</p> <p>Due to the number of houses proposed and the proximity to the Upper Nene Valley Gravel Pits SPA a Suitable Area Natural Greenspace (SANG), will be required to provide an area for residents to use and in particular provide for dog walkers to include provision for a substantial “off-lead” area and a sufficient circular route (approx.3km distance, Footprint Ecology SPA Visitor Survey). Further information regarding SANGS can be provided if necessary, but the Council should take its steer from the Thames Basin Heaths SPA SANG approach which establishes key principles.</p>	<p>they are in place and created ahead of the anticipated adverse effect arising. This will ensure that there is no temporal shortfall in habitat availability.</p> <p>Without the Upper Nene Valley Gravel Pits SPA mitigation strategy in place to address recreational pressure by the time of Plan adoption, associated with the lack of detail regarding the provision of a SANG, Natural England currently is not confident that mitigation measures will be able to address recreational pressure impacts to the Upper Nene Valley Gravel Pits SPA.</p>	
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				<p>Due to the number of houses proposed and the proximity to the Upper Nene Valley Gravel Pits SPA a Suitable Area Natural Greenspace (SANG), will be required to provide an area for residents to use and in particular provide for dog walkers to include provision for a substantial "off-lead" area and a sufficient circular route (approx.3km distance, Footprint Ecology SPA Visitor Survey). Further information regarding SANGS can be provided if necessary, but the Council should take its steer from the Thames Basin Heaths SPA SANG approach which establishes key principles.</p>	
<p><b>Representation reference:</b> 246/1/16</p>	<p><b>Refers to:</b> Policy 30</p>	<p><b>Legal compliance and soundness:</b> Legal compliance:</p>	<p><b>Comments:</b></p>	<p><b>Suggested changes:</b> Noted.</p>	<p><b>Officer comments:</b> To mitigate potential effects on</p>

<p><b>Name:</b> Natural England</p>		<p>- not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>The policy wording quoted within the HRA is not reiterated within the Northampton Borough Council 2011-2029 Proposed Submission – Round 2, June 2020 document.</p> <p>The HRA concludes no adverse effects on the integrity of the Upper Nene Valley Gravel Pits SPA, however Natural England does not support this conclusion at this stage.</p>		<p>the Upper Nene Valley Gravel Pits SPA and Ramsar site, the policy wording within the HRA at para 5.88 is contained within Policy 30 of the LPP2. No modification required.</p>
<p><b>Representation reference:</b> 75/1/10</p> <p><b>Name:</b> Town Centre Conservation Area Advisory Committee</p>	<p><b>Refers to:</b> Policy 31</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> In our experience, many applications do not recognise and promote the characteristic vernacular and features of conservation areas, which create and maintain the character which the designation seeks to protect. Therefore, add a new bullet point “Conforms to design codes and distinctive features identified for conservation areas, e.g. in each Conservation Area appraisal”.</p>	<p><b>Suggested changes:</b> - Add “views” to the important aspects listed under the fourth bullet point.</p>	<p><b>Officer comments:</b> Policy 31 of the LPP2 seeks to protect and enhance the designated and non-designated heritage assets, including understanding their settings, within Northampton. Northampton Borough Council has Conservation Area Appraisals and Management Plans to guide development within each respective CA. Policy BN5 of the West Northamptonshire joint Core Strategy also requires developments to</p>



					contribute to the character of the area, including CA's. No modification required.
<p><b>Representation reference:</b> 240/1/3</p> <p><b>Name:</b> Spring Boroughs Neighbourhood Voice</p>	<p><b>Refers to:</b> Policy 31 and general</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> With reference to the Castle House site. We note this is not referenced in the Local Plan. We would like it to be, with reference to the Spring Boroughs Neighbourhood plan. We have a vision that this area is opened up in such a way as to integrate the heritage sites surrounding it, while incorporating much needed housing. The housing we envision would be in keeping with the rest of Spring Boroughs, that is social housing, possibly for older residents as a move on, thus freeing up larger family homes for the next generation.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The Local Plan Part 2 refers to neighbourhood plans. Any proposal that comes forward will need to comply with all the policies contained in the relevant development plans including Spring Boroughs Neighbourhood Plan as well as heritage related policies in all development plans. It is not therefore considered necessary to include a reference to the Castle House site.</p>
<p><b>Representation reference:</b> 68/1/12</p> <p><b>Name:</b> Highways England</p>	<p><b>Refers to:</b> para. 11.3</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> In relation to further transport infrastructure improvements the plan states that the Council will work together with Highways England and other relevant bodies to design and fund improvements to transport infrastructure where these are necessary to support growth or to improve existing centres, employment areas and community facilities. We welcome this approach and will engage with the Council on developments which impact the SRN.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

<b>Representation reference:</b> 248/1/8  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> para. 11.4	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective	<b>Comments:</b> 11.4 Clearly the county level transportation plan (2012) is out of date and does not reflect current sustainability objectives. The borough should ensure new West Northamptonshire unitary council prioritises review of the transport plan to include current sustainability targets, once the vital work of deciding the colour of the new authority's logo is complete.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 230/1/4  <b>Name:</b> Moulton Parish Council	<b>Refers to:</b> para. 11.5	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not effective	<b>Comments:</b> No mention of Northern Orbital Route. This should be cross-referenced to Appendix C.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The Northern Orbital Route is mentioned in paragraph 11.15 of the LPP2.
<b>Representation reference:</b> 230/1/3  <b>Name:</b> Moulton Parish Council	<b>Refers to:</b> para. 11.7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not effective	<b>Comments:</b> Expansion of Northampton's population to the north and further housing is likely to lead to expansion of through-traffic in Moulton. What mitigation is planned to reduce through traffic in Moulton? (the only reference we can find is obliquely via points 11.7 and 11.8). Specifically, where Northampton's plans impact areas outside Northampton Borough (as in this case) a clear commitment should be made to addressing any consequential impact. Please also note other comments made elsewhere about Northern Orbital Route; NOR is unlikely alone to be sufficient to prevent Moulton being used as a rat run for through traffic.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 32 of the LPP2 requires developers to fund and financially contribute towards a range of transport schemes. Policy 37 of the LPP2 also requires major development to contribute towards the delivery of and where necessary provide land / suitable sites for any new infrastructure.

					A list of transport schemes can be found in the Infrastructure Delivery Plan 2019 and at Appendices C - H of the LPP2.
<b>Representation reference:</b> 241/1/8  <b>Name:</b> British Horse Society	<b>Refers to:</b> para. 11.7	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Walking and cycling routes - this excludes equestrians. Most walking and cycling activity is for leisure, as is equestrian activity. Provision should be made for all modes of Active Travel and no barriers should be created to prevent public routes being enjoyed by as many user groups as possible. The creation of shared cycle / pedestrian or cycle paths on the carriageway or adjacent to the carriageway creates additional danger for equestrians. They are left sandwiched between fast moving traffic on their outside and then additional fast-moving cycle traffic on their inside – sometimes that cycle traffic is two directional. The lack of links between settlements and parishes is highlighted in the RoWIP for Northamptonshire. Northamptonshire committed to involve user groups to identify improvements to routes, create new routes where necessary and prioritise Definitive Map anomalies to join up the network.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 248/1/9  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> para. 11.8	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective	<b>Comments:</b> 11.8 commitment to modal shift target is extremely welcome.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 241/1/9	<b>Refers to:</b> para. 11.12	<b>Legal compliance and soundness:</b>	<b>Comments:</b> Walking and cycling is included in the design of transport schemes -equestrians are excluded.To reiterate, horse riders	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<p><b>Name:</b> British Horse Society</p>		<p>Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>have access to only 22% of the public rights of way network and carriage drivers to just 5%. Invariably equestrians have to use the road network to access their nearest bridleway or byway and it is important that they are able to do this safely and are provided with safe routes just as walkers and cyclists are. Including equestrians provides even better value for the public purse. The creation of shared cycle / pedestrian or cycle paths on the carriageway or adjacent to the carriageway creates additional danger for equestrians. They are left sandwiched between fast moving traffic on their outside and then additional fast-moving cycle traffic on their inside – sometimes that cycle traffic is two directional.</p>		
<p><b>Representation reference:</b> 62/1/7</p> <p><b>Name:</b> Northamptonshire County Council / North Northants JPU</p>	<p><b>Refers to:</b> Policy 32</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> We are very supportive of policies that create a shift towards more sustainable and active forms of travel. The benefits to the community / population of higher levels of active / sustainable travel are many and well documented, including less congestion, better health and wellbeing, reduced pollution and economic benefits of improved access to businesses / shops. Despite many years of policy objectives of achieving a modal shift to active travel, progress has been limited. This is even more pertinent now given the massive health and wellbeing challenges we face and the importance of being active in addressing those.</p> <p>A shift towards more sustainable travel patterns is likely to be crucial for the success of the town and Borough of Northampton in the future. This is particularly the case given the substantial amount of housing growth likely to take place in Northampton in the coming years and the likely increase in car traffic that this will bring. There are a number of reasons why we think this policy is so important:</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 65/1/6</p>	<p><b>Refers to:</b> Policy 32</p>	<p><b>Legal compliance and soundness:</b></p>	<p><b>Comments:</b></p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b></p>

<p><b>Name:</b> English Regional Transport Association</p>		<p>Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened.</p> <p>Northampton North –West and Northern Relief Roads - These will both 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 the ERTA also wishes to see re-opened.</p> <p>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 (also see APPENDIX D - Transport and Infrastructure Schedule).</p>		<p>The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p><b>Representation reference:</b> 113/1/14</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 32</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic,</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to</p>

			and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.		accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.
<p><b>Representation reference:</b> 113/1/16</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 32</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be</p>

					required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.
<p><b>Representation reference:</b> 113/1/18</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 32</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety The cumulative impact of the development proposed in East Hunsbury on traffic density and air pollution will be significant, particularly as two Air Quality Management Areas abut the parish boundary. The Local Plan should address facilities for walking, cycling and public transport and creating a joined-up approach across Northampton, rather than concentrating efforts on new developments. A reduction in car use will only be achievable with access to reliable public transport services (including the rail network), with additional services and good connections. Linking existing cycle routes with clear, safe, and well-maintained cycle paths to create a proper network is essential.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 32 of the LPP2 requires developments to fund and financially contribute towards a range of transport schemes and to demonstrate that they can mitigate the proposal's transport impact either on or off-site. The policy requires developments to achieve sustainable transport principles including promoting modal shift away from and reduction of car usage. Policy 35 of the LPP2 requires new development to provide facilities for</p>

					electric vehicle charging points. Both policies are expected to improve air quality. No modification required.
<p><b>Representation reference:</b> 197/1/6</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 32</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b></p> <p>3. The County Council supports inclusion within the Draft Plan Policy 32 to design and support sustainable transport and travel, and in particular the requirement for development to be designed to incorporate, demonstrate and achieve provision of electric vehicle re-charging points. Inclusion of this as a policy will help to encourage modal shift away from standard modes of transport towards more sustainable methods and meet the rising demand for such provision as demonstrated through significant increase in sales of electric plug-in and low emission vehicles across the UK.</p> <p>4. In addition to highway improvements, provision may also be sought towards facilities enabling improved traffic and travel information in the Borough, sometimes as part of a travel plan, to help mitigate the impact of development. Even in areas where the car is the primary mode of travel, live information can help to promote the availability of alternative travel modes and reduce congestion by providing helpful journey information.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 200/1/43</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 32</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared</p>	<p><b>Comments:</b> Under Policy 32 developments should be designed to provide electric vehicle re-charging points (EVCPs) in line with Policy 35.</p>	<p><b>Suggested changes:</b> Under Policy 32 developments should be designed to provide electric vehicle re-charging points (EVCPs) in line with Policy 35.</p>	<p><b>Officer comments:</b> Modify the plan by remove reference to Policy 34 from Policy 32.</p>



		<ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>			
<p><b>Representation reference:</b> 234/1/5</p> <p><b>Name:</b> Diversified Property Fund For Charities</p>	<p><b>Refers to:</b> Policy 32</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:  <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul> </p>	<p><b>Comments:</b> Whilst it is not believed that this is their intention, the implication of these policies, as presently worded, is that a proposal for the change of use of a unit in excess of 1,000sqm would require the submission of a Sustainability Statement, Health Impact Assessment and Travel Plan. Applied to Grafton Trade Park, this could mean that a straightforward change of use application for one of the larger units (for example, to allow another car rental operator within the Trade Park) would trigger the need for such burdensome documents. Such requirements would appear to be inappropriate and disproportionate for such modest changes of use and ought to be removed.</p>	<p><b>Suggested changes:</b> DPFC therefore suggest that these policies are amended to clarify that they apply solely to proposals for new build floorspace over 1,000sqm and not to changes of use of existing floorspace.</p>	<p><b>Officer comments:</b> It is important that these requirements apply to all developments because they all have impacts on sustainability, health and transport related matters. No modification required.</p>
<p><b>Representation reference:</b> 244/1/26</p> <p><b>Name:</b> Bastion Group</p>	<p><b>Refers to:</b> Policy 32</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> This is considered to be an important policy in terms of securing necessary sustainable travel principles within developments and Bastion support the majority of components within the policy. The reference to the need to upgrade and improve the existing street scene is however, considered ambiguous and lacks clarity in terms of what it actually requires. It also risks not being consistent with national policy and is not effective as it is unlikely that all schemes would be able to demonstrate that such a requirement is compliant with Regulation 122 of Community Infrastructure Regulations (2019, as amended), the NPPF and the PPG Paragraph: 002 Reference ID: 23b-002-20190901 in terms of being:</p> <ul style="list-style-type: none"> <li>• necessary to make the development acceptable in planning terms;</li> <li>• directly related to the development; and</li> </ul>	<p><b>Suggested changes:</b> It is therefore recommended that this component of the policy is deleted and the wider policy is reviewed in this same context.</p>	<p><b>Officer comments:</b> It is expected that the street scene is considered and incorporated into sustainable transport and travel schemes as it is a key component. Individual schemes will need to be discussed with the Council as part of the development management process.</p>

			<ul style="list-style-type: none"> <li>fairly and reasonably related in scale and kind to the development.</li> </ul>		
<p><b>Representation reference:</b> 251/1/24</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 32</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Under Policy 32 developments should be designed to provide electric vehicle re-charging points (EVCPs) in line with Policy 35.</p>	<p><b>Suggested changes:</b> Under Policy 32 developments should be designed to provide electric vehicle re-charging points (EVCPs) in line with Policy 35.</p>	<p><b>Officer comments:</b> Modify the Policy and remove reference to Policy 34 from Policy 32.</p>
<p><b>Representation reference:</b> 113/1/15</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 33</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic, and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the</p>

					need for localised improvement works, particularly around access to sites. No modification required.
<p><b>Representation reference:</b> 113/1/17</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 33</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.</p>

<p><b>Representation reference:</b> 113/1/19</p> <p><b>Name:</b> East Hunsbury Parish Council</p>	<p><b>Refers to:</b> Policy 33</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety The cumulative impact of the development proposed in East Hunsbury on traffic density and air pollution will be significant, particularly as two Air Quality Management Areas abut the parish boundary. The Local Plan should address facilities for walking, cycling and public transport and creating a joined-up approach across Northampton, rather than concentrating efforts on new developments. A reduction in car use will only be achievable with access to reliable public transport services (including the rail network), with additional services and good connections. Linking existing cycle routes with clear, safe, and well-maintained cycle paths to create a proper network is essential.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 32 of the LPP2 requires developments to fund and financially contribute towards a range of transport schemes and to demonstrate that they can mitigate the proposal's transport impact either on or off-site. The policy requires developments to achieve sustainable transport principles including promoting modal shift away from and reduction of car usage. Policy 35 of the LPP2 requires new development to provide facilities for electric vehicle charging points. Both policies are expected to improve air quality. No modification required.</p>
<p><b>Representation reference:</b> 65/1/3</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> para. 11.15</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p>	<p><b>Comments:</b> Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for</p>	<p><b>Suggested changes:</b> None specified</p>	<p><b>Officer comments:</b> The route of the former Northampton to</p>

English Regional Transport Association		<p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p>railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened.</p> <p>Northampton North –West and Northern Relief Roads - These will both 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 the ERTA also wishes to see re-opened.</p> <p>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 (also see APPENDIX D - Transport and Infrastructure Schedule).</p>		Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.
<p><b>Representation reference:</b> 230/1/5</p> <p><b>Name:</b> Moulton Parish Council</p>	<p><b>Refers to:</b> para. 11.15</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not effective</li> </ul>	<p><b>Comments:</b> Safeguarding route of former Northampton to Market Harborough railway as a potential transport corridor implies loss/degradation of Brampton Valley way foot/cycle path. Surely, for wellbeing, a commitment should be made to no loss of habitat or environment on this route?</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> It is accepted that the route is identified as an important green infrastructure corridor and this is referenced in the Green Infrastructure (GI) Study 2016. The GI study includes this corridor within</p>

					its Brampton Arm of River Nene component, from which several GI projects have been identified to support the corridor. Any proposal that comes forward on the former Northampton to Market Harborough railway line will need to take the GI study into account, as outlined in Policy 27 Sustaining and enhancing existing, and supporting the creation of, Northampton's green infrastructure.
<b>Representation reference:</b> 230/1/6  <b>Name:</b> Moulton Parish Council	<b>Refers to:</b> para. 11.15	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not effective	<b>Comments:</b> mention of Northern Orbital Route, but this is not referenced in Appendix C.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The Northern Orbital Route is not referenced in Appendix C as there is no approved scheme yet.
<b>Representation reference:</b> 248/1/4  <b>Name:</b>	<b>Refers to:</b> para. 11.15	<b>Legal compliance and soundness:</b> Legal compliance: - not specified	<b>Comments:</b> It is extremely welcome to see a council considering new rail destinations, so often councils limit themselves to meekly asking for a couple of extra services on existing routes, so to	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

Welland Valley Rail		Plan is unsound: - not effective	see new destinations being both considered and route for them protected is extremely welcome.		
<p><b>Representation reference:</b> 248/1/10</p> <p><b>Name:</b> Welland Valley Rail</p>	<p><b>Refers to:</b> para. 11.15</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> 11.15 The council then lets itself down by casually presuming that a number of major road projects WILL take place, which clearly run completely counter to pollution, modal shift and decarbonisation targets, and gives the impression that the council will not be holding all development to the same sustainability scrutiny. E.g. "will" ..... "the dualling of the A43 from Northampton to Kettering"</p>	<p><b>Suggested changes:</b> Suggest changing language in 11.15 from "will" to "may" and adding "all planned and potential transport projects will be reviewed against current sustainable transport &amp; travel policy". Clearly if a road is busy enough to consider dualing, and there is not currently a corresponding rail link along that route - it is a prime candidate for provision of a sustainable rail link. Whilst this particular road project may not fall within the council's current geographical boundary, it is still in a good position to influence it,</p>	<p><b>Officer comments:</b> The dualling of the A43 from Northampton to Kettering is a Northamptonshire County Council scheme which is currently in their Local Transport Plan to come forward within and beyond the Local Plan period. No modification required.</p>

				which will be further increased when the new unitary authority comes into effect.	
<p><b>Representation reference:</b> 65/1/4</p> <p><b>Name:</b> English Regional Transport Association</p>	<p><b>Refers to:</b> para. 11.16</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both 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 the 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 (also see APPENDIX D - Transport and Infrastructure Schedule).</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p><b>Representation reference:</b> 65/1/5</p>	<p><b>Refers to:</b> para. 11.17</p>	<p><b>Legal compliance and soundness:</b> Legal compliance:</p>	<p><b>Comments:</b> Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The route of the former</p>



<p><b>Name:</b> English Regional Transport Association</p>		<p>- not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened.</p> <p>Northampton North –West and Northern Relief Roads - These will both 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 the ERTA also wishes to see re-opened.</p> <p>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 (also see APPENDIX D - Transport and Infrastructure Schedule).</p>		<p>Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p><b>Representation reference:</b> 248/1/11</p> <p><b>Name:</b> Welland Valley Rail</p>	<p><b>Refers to:</b> para. 11.17</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> 11.17 It is also extremely welcome to see the Brackmills corridor being protected for transport use, however despite being mentioned in the text it does not appear on the maps, so we would like to see it defined on the map to avoid ambiguity over it's definition. We would expect that "Brackmills" would include both former routes which went onto Bedford and Wellingborough.</p>	<p><b>Suggested changes:</b> Include Brackmills corridor between Northampton Station and Brackmills on the policies map.</p>	<p><b>Officer comments:</b> This was omitted in error. This is being recommended for inclusion in Policy 34 and the Policies Map as part of the minor modifications.</p>

<p><b>Representation reference:</b> 248/1/12</p> <p><b>Name:</b> Welland Valley Rail</p>	<p><b>Refers to:</b> para. 11.17 and policies map</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> 11.17 It is also extremely welcome to see the Brackmills corridor being protected for transport use, however despite being mentioned in the text it does not appear on the maps, so we would like to see it defined on the map to avoid ambiguity over it's definition. We would expect that "Brackmills" would include both former routes which went onto Bedford and Wellingborough.</p>	<p><b>Suggested changes:</b> Include Brackmills corridor between Northampton Station and Brackmills on the policies map.</p>	<p><b>Officer comments:</b> This was omitted in error. This is being recommended for inclusion in Policy 34 and the Policies Map as part of the minor modifications.</p>
<p><b>Representation reference:</b> 65/1/7</p> <p><b>Name:</b> English Regional Transport Association</p>	<p><b>Refers to:</b> Policy 34</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both 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 the 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</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>

			the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).		
<b>Representation reference:</b> 75/1/12  <b>Name:</b> Town Centre Conservation Area Advisory Committee	<b>Refers to:</b> Policy 34	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective - not consistent with national policy	<b>Comments:</b> It is not enough to minimise pollution issues, developments must not create or exacerbate pollution issues and should ideally reduce existing pollution issues. This is clearly important for health, but it is also a heritage issue within the remit of the TCCAAC because pollution can have a catastrophic effect on historic buildings (e.g. destroying carved stonework).	<b>Suggested changes:</b> In the second paragraph of this policy, replace “provide opportunities to minimise and where possible reduce pollution issues” to “demonstrate that they will not create or exacerbate pollution issues and if possible will reduce pollution issues”.	<b>Officer comments:</b> Policy 34 of the LPP2 relates to transport schemes and requires proposals for future transport schemes to state how they will contribute to lowering emissions and contribute to the aim of achieving net-zero emissions by 2030. This is in line with Northampton's declaration of a Climate Emergency in 2019. Along with other policies within the plan, it is expected to assist Northampton in reducing pollution and adapting to climate change by the end of the plan period. No modification required.
<b>Representation reference:</b> 197/1/7	<b>Refers to:</b> Policy 34	<b>Legal compliance and soundness:</b>	<b>Comments:</b>	<b>Suggested changes:</b>	<b>Officer comments:</b>

<p><b>Name:</b> Northamptonshire County Council</p>		<p>Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Policy 34, which includes the safeguarding of the former Northampton – Market Harborough railway line for future transport use is supported by the County Council. It is suggested however that in addition to this, a new Policy be included within the Draft Plan which acknowledges the importance of the former Northampton – Bedford railway line, and which seeks to safeguard this as a potential future transport route, catering for existing and future workforce travel whilst also providing additional capacity and travel choices to meet the needs of the growth of Northampton and surrounding areas.</p>	<p>Policy 34, which includes the safeguarding of the former Northampton – Market Harborough railway line for future transport use is supported by the County Council. It is suggested however that in addition to this, a new Policy be included within the Draft Plan which acknowledges the importance of the former Northampton – Bedford railway line, and which seeks to safeguard this as a potential future transport route, catering for existing and future workforce travel whilst also providing additional capacity and travel choices to meet the needs of the growth of Northampton and surrounding areas.</p>	<p>This is an omission. Modify the Plan to include reference to the railway line in Policy 34.</p>
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<p><b>Representation reference:</b> 227/1/1</p> <p><b>Name:</b> Harborough District Council</p>	<p><b>Refers to:</b> Policy 34</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> The plan is not strategic and therefore has limited impact on Harborough District. However, HDC note the inclusion of Policy 34 – ‘Transport Schemes and Mitigation’ which safeguards the route of the former Northampton to Market Harborough railway line for future transport use. In line with comments made to the West Northamptonshire Strategic Plan Issues consultation, the North-South rail is an interesting proposition and is worthy of further consideration. We would like to be included in any future discussions regarding this project.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 248/1/13</p> <p><b>Name:</b> Welland Valley Rail</p>	<p><b>Refers to:</b> Policy 34</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> Policy 34 - in line with 11.17, it would be preferable to see the Brackmills-Castle station corridor given the same degree of definition and protection as the Market Harborough corridor.</p>	<p><b>Suggested changes:</b> Policy 34 - in line with 11.17, it would be preferable to see the Brackmills-Castle station corridor given the same degree of definition and protection as the Market Harborough corridor.</p>	<p><b>Officer comments:</b> This was omitted in error. This is being recommended for inclusion in Policy 34 and the Policies Map as part of the minor modifications.</p>
<p><b>Representation reference:</b> 97/1/18</p> <p><b>Name:</b> Clayson Country Homes</p>	<p><b>Refers to:</b> Policy 35</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> It is considered that Policy 35 and its reference to the Parking Standards SPD is the appropriate approach to dealing with standards in new development and allows for future revisions to the corresponding SPD. However, the implications for housing delivery as a result of changing standards should be seriously considered and understood before any updated SPD is adopted. The most recent iteration of the NCC Parking Standards sought an increased level of parking from residential developments, over and above that which was planned for at the time when the JCS was adopted. The result of an increased</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Northampton Borough Council has adopted its own Parking Standards SPD. No modification required.</p>

			land take for parking spaces is less land for residential development and it is urged that through any future consideration of parking standards that this relationship be fully explored and understood.		
<b>Representation reference:</b> 195/1/17  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> Policy 35	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> It is considered that Policy 35 and its reference to the Parking Standards SPD is the appropriate approach to dealing with standards in new development and allows for future revisions to the corresponding SPD. However, the implications for housing delivery as a result of changing standards should be seriously considered and understood before any updated SPD is adopted. The most recent iteration of the NCC Parking Standards sought an increased level of parking from residential developments, over and above that which was planned for at the time when the JCS was adopted. The result of an increased land take for parking spaces is less land for residential development and it is urged that through any future consideration of parking standards that this relationship be fully explored and understood.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 200/1/44  <b>Name:</b> HBF	<b>Refers to:</b> Policy 35	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Under Policy 35 new development must meet adopted parking standards and accord with the principles set out in the Parking Standards Supplementary Planning Document (SPD) including the provision of facilities for EVCPs.  The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. Recently, the Department of Transport held a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019).	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

			<p>This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in 2020. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be untethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M. The Government has estimated installation of such charging points add on an additional cost of approximately £976.</p>		
<p><b>Representation reference:</b> 200/1/45</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 35</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's recent consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement,</p>	<p><b>Suggested changes:</b> The requirement for EVCPs should be deleted because of the Government's proposed changes to Building Regulations.</p>	<p><b>Officer comments:</b> The requirements for EVCPs are required to ensure that the Council continues to address climate change. The Government's guidance has not yet been finalised.</p>

			<p>which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades, which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.</p> <p>The Council's viability evidence set out in Plan Viability Study by Aspinall Verdi dated June 2020 includes a cost allowance of £1,000 per space but the sufficiency of this allowance cannot be assessed because of the vagueness of the Council's policy wording.</p>		
<p><b>Representation reference:</b> 200/1/46</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 35</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective</p>	<p><b>Comments:</b> Furthermore, the Regulations are clear that development management policies, which are intended to guide the determination of applications for planning permission should be set out in the Local Plan. The Council should not devolve fundamental policy matters to its Parking Standards SPD. Where SPDs are prepared, they should be used to provide more detailed advice and guidance on the policies in the LPP2 and not as an opportunity to change or introduce the requirements of a policy. As defined in 2019 NPPF Glossary, an SPD is capable of being a material consideration in planning</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Policy 35 sets out that new development must meet adopted parking standards. In the case of Northampton Borough, these are the Northamptonshire</p>



		- not consistent with national policy	decisions but is not part of the Local Plan. The Regulations indicate that an SPD does not have statutory force. An SPD is defined as something that is not a Local Plan as it has not been subject to the same process of preparation, consultation and examination. The Council should not convey Local Plan status onto its Parking Standards SPD.		County Council adopted parking standards. The Northampton Parking Standards SPD provides further principles and guidance for parking. No modification required.
<p><b>Representation reference:</b> 229/1/28</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<p><b>Refers to:</b> Policy 35</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The provision of electric vehicle charging points will need to be secured at Outline or Full Application stage through way of Condition. The ability to provide rapid charging points is dependent on the capacity of the electric substation that serves the Development and the ability of the electric infrastructure network.</p> <p>Issues have occurred in the wider Northamptonshire area, where Authorities have imposed a car charging scheme condition on Reserved Matters Applications, expecting an electric vehicle car charging scheme to be a form of rapid car charging. This might not be possible if there is no capacity for rapid car charging at the electric substation that serves the site. This happens more often where electricity supply to the site is reliant on an existing substation.</p> <p>The policy does not expand on what is required in terms of Car Parking Management Strategy.</p> <p>The policy by not acknowledging these the technical issues or expanding on what a car parking management strategy would entail, is therefore not effective.</p>	<p><b>Suggested changes:</b> Modification: New developments must meet adopted parking standards and accord with the principles set out in the Parking Standards SPD. Applicants are required to demonstrate that electric vehicle charging is a rapid form of car charging, unless the infrastructure capabilities indicate otherwise.</p> <p>Transport schemes and major new Developments should also provide a Car Parking</p>	<p><b>Officer comments:</b> Policy 35 requires provision of electric vehicle charging points and does not mention rapid charging. Applicants will need to meet requirements set out in the relevant parking SPD and liaise with the Highways Authority as a part of their application process. No modification required.</p>

				Management Strategy. The strategy will need to address the following issues....”	
<p><b>Representation reference:</b> 250/1/20</p> <p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>	<p><b>Refers to:</b> Policy 35</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> It is considered that Policy 35 and its reference to the Parking Standards SPD is the appropriate approach to dealing with standards in new development and allows for future revisions to the corresponding SPD. However, the implications for housing delivery as a result of changing standards should be seriously considered and understood before any updated SPD is adopted. The most recent iteration of the NCC Parking Standards sought an increased level of parking from residential developments, over and above that which was planned for at the time when the JCS was adopted. The result of an increased land take for parking spaces is less land for residential development and it is urged that through any future consideration of parking standards that this relationship be fully explored and understood.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 251/1/25</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 35</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The Developers disagree with the proposed approach to Policy 35 as set out below. Policy 35 proposes the following requirement: ‘New development must meet adopted parking standards and accord with the principles set out in the Parking Standards SPD including the provision of facilities for electric vehicle charging points.’ The Developers are supportive of the encouragement for the use of electric and hybrid vehicles but consider this should be secured through a national standardised approach implemented through the Building Regulations. This will ensure a consistent approach to future proofing the housing stock. In this regard, the Department of Transport undertook a consultation on Electric Vehicle Charging in Residential and</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> There is a need to ensure that local standards are required to meet the local aspirations and objectives for parking provision as well as climate change. It is considered that one per dwelling is not sufficient to meet the needs of householders. In</p>

			<p>Non-Residential Buildings in July 2019. This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which was expected to come into force in 2020.</p> <p>The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and considered a proposal for one charge point per dwelling rather than per parking space.</p> <p>The Government estimated installation of such charging points add on an additional cost of approximately £976 per car parking space for an average home<sup>23</sup>.</p>		<p>addition, the Government's guidance on these issues have not been finalised.</p>
<p><b>Representation reference:</b> 251/1/26</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 35</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible: 'However, we recognise that the cost of installing chargepoints can be high in areas where significant electrical capacity reinforcements are needed. To mitigate any potential negative impact on housing supply as a result of these regulations, this consultation seeks views on an appropriate exemption from the chargepoint installation requirement based on the grid connection cost. The consultation proposes the threshold for the exemption is set at £3600, which is three times the high scenario cost of the average electrical capacity connection required for one chargepoint.' In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied: 'The EPBD also sets out requirements for residential buildings undergoing major renovation with more than 10 parking</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The policy has been assessed and is considered viable.</p>

			spaces. As a starting point, the government proposes to transpose the EPBD requirements for major renovations - i.e. the installation of cable routes in all parking spaces in scope as we think this is a proportionate requirement. However, the consultation seeks views on the possibility of going further than the EU requirements.’ The requirement for EVCPs should be deleted given the Government’s proposed changes to Building Regulations are still at the consultation stage and therefore have not been finalised.		
<p><b>Representation reference:</b> 251/1/27</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 35</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> In any event, the wording of draft Policy 35 would fail the tests of soundness as per NPPF Paragraph 16 which states that policies should be ‘clearly written and unambiguous, so it is evident how a decision maker should react to development proposals’. The policy does not define how many EVCPs are required per plot, or whether these are required on a per dwelling or per space basis. Resultingly, the draft policy is unlawful in that it devolves fundamental development management policies, which should be set out through the NLP2, to the Parking Standards SPD. The PPG24 is clear that such an approach is contrary to the role of SPDs: ‘Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.’ [Emphasis added] As currently drafted, Policy 35 risks introducing new planning policies into the development plan, such as the imposition of delivering EVCPs and would thus be unlawful.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The adopted Supplementary Planning Document on Parking provides the necessary details on the implementation of this policy.</p>

			<p>In this respect, the Developers wish to refer the Council to the implications of William Davis v Charnwood Borough Council<sup>25</sup>, where Gilbart J quashed Charnwood Borough Council's enforced housing mix policy on the basis that it should have been adopted as part of a Development Plan Document ('DPD'), requiring independent examination, instead of an SPD, which only requires consultation.</p> <p>The housing mix policy deferred to an adopted SPD which itself prescribed a specific housing mix expected from new developments, with any departure from the specified percentages requiring justification through evidence. Gilbart J agreed with the group of claimants in that the policy constituted a statement regarding 'the development and use of land which the local planning authority wish to encourage during any specified period', and was a 'development management policy ... intended to guide the determination of applications for planning permission.' Accordingly, by virtue of regulations 2, 5 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the policy needed to be adopted in a DPD rather than an SPD. The housing mix policy was also found to be unlawful due to a failure by the Council to undertake a viability assessment of the policy before the SPD was adopted.</p> <p>In the case of draft Policy 35, the Developers note that the Council's Plan Viability Study (Aspinall Verdi, June 2020) incorporates a build cost assumption £1,000 per charge points per dwelling<sup>26</sup>. However, given the ambiguity of the policy requirement, the basis and sufficient of this allowance cannot be accurately assessed.</p>		
<p><b>Representation reference:</b> 197/1/8</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Chapter 12</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness:</p>	<p><b>Comments:</b> 6. The Draft Plan clearly acknowledges the fundamental role that infrastructure delivery will play in meeting the housing and employment trajectories set out in the WNJCS. The Infrastructure required to serve the current and future needs of the Borough is set out in the Infrastructure Delivery Plan;</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

		- not specified	this should be regularly reviewed to ensure it remains up to date and takes into account emerging priorities and opportunities, and to identify any potential challenges to delivery and put in place solutions to address these.		
<b>Representation reference:</b> 230/1/7  <b>Name:</b> Moulton Parish Council	<b>Refers to:</b> para. 12.9	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not effective	<b>Comments:</b> No mention of healthcare facilities at Northampton North SUE. Bearing in mind the already over-stretched GP surgery in Moulton and the lack of progress by NHS on provision of expanded facilities for existing Moulton residents, what provision is intended for Northampton North SUE? This should be cross-referenced to Appendix F.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The Policy and requirements for Northampton North SUE are set out in the West Northamptonshire Joint Core Strategy.
<b>Representation reference:</b> 200/1/47  <b>Name:</b> HBF	<b>Refers to:</b> Policy 36	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Policy 36 : Electronic Communication Networks Under Policy 36 all new development should ensure appropriate infrastructure is provided during construction that is sufficient to enable all development to be connected to full fibre broadband without any post development works.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 200/1/49  <b>Name:</b> HBF	<b>Refers to:</b> Policy 36	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared	<b>Comments:</b> It is also unclear if the requirements of Policies 36 and 37 have been included in the Council's viability testing.	<b>Suggested changes:</b> These policy requirements are unnecessary and repetitive of Building Regulations, which should be deleted.	<b>Officer comments:</b> Policies 36 and 37 have been considered in the LPP2's Viability Assessment (Appendix 1). No modifications

		<ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>			required to Policies 36 and 37.
<p><b>Representation reference:</b> 251/1/28</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 36</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:  <ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul> </p>	<p><b>Comments:</b> Policy 36 requires that ‘all new development should ensure appropriate infrastructure is provided during construction that is sufficient to enable all development to be connected to full fibre broadband without any post development works.’ The Developers disagree with this proposed approach as set out in the response to Policy 37 below. Policy 37 stipulates that ‘Developers are also required to provide delivery of “full fibre” connectivity to new build development.’</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 197/1/9</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> para. 12.12</p>	<p><b>Legal compliance and soundness:</b> Legal compliance:  <ul style="list-style-type: none"> <li>- not specified</li> </ul> </p> <p>Soundness:  <ul style="list-style-type: none"> <li>- not specified</li> </ul> </p>	<p><b>Comments:</b> 7. The County Council acknowledges the amendments made to section d) Education to reflect the role of the County Council as Local Education Authority with statutory duties in respect of providing sufficiency of school places.</p>	<p><b>Suggested changes:</b> As a point of clarity, it is suggested that the wording from paragraph 12.12 be further amended as follows:  “The plan calculates the additional school places required to accommodate the future growing population as a result of changes to birth rate and inward migration levels. The impact of additional</p>	<p><b>Officer comments:</b> The recommended changes are considered acceptable. Modify para 12.12 as follows:  “The plan calculates the additional school places required to accommodate the future growing population as a result of changes to birth rate and inward migration levels. The impact of additional housing</p>

				<p>housing growth allocated through the Local Plan process is expected however to place further pressures on local school capacity. . It is recognised that there are also free schools located within Northamptonshire. A free school is a type of academy, a non-profit making, independent, state-funded school which is free to attend but which is not wholly controlled by a local authority. Free schools are governed by non-profit charitable trusts that sign funded agreements with the Secretary of State for Education. The majority of new schools delivered in Northampton will be free schools.</p>	<p>growth allocated through the Local Plan process is expected however to place further pressures on local school capacity. . It is recognised that there are also free schools located within Northamptonshire. A free school is a type of academy, a non-profit making, independent, state-funded school which is free to attend but which is not wholly controlled by a local authority. Free schools are governed by non-profit charitable trusts that sign funded agreements with the Secretary of State for Education. The majority of new schools delivered in Northampton will be free schools.</p> <p>“The funding provision for new</p>
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				<p>“The funding provision for new school places education is provided through a number of mechanisms including from the Government, the Education Skills and Funding Agency, and through securing funding from developers via Section 106 Agreements and the local Community Infrastructure Levy where school places are required as result of housing growth. Developers should seek the advice of the Local Education Authority and the Local Planning Authority to determine what level of education provision will need to be provided in order to mitigate their development, where it is to be</p>	<p>school places education is provided through a number of mechanisms including from the Government, the Education Skills and Funding Agency, and through securing funding from developers via Section 106 Agreements and the local Community Infrastructure Levy where school places are required as result of housing growth. Developers should seek the advice of the Local Education Authority and the Local Planning Authority to determine what level of education provision will need to be provided in order to mitigate their development, where it is to be located and the associated cost.”</p>
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				located and the associated cost.”	
<b>Representation reference:</b> 197/1/10  <b>Name:</b> Northamptonshire County Council	<b>Refers to:</b> para. 12.14	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> The County Council welcomes the inclusion of wording relating to the importance of Library infrastructure within the Draft Plan (12.14) and the need for new housing developments to mitigate their impact on its provision through Section 106 developer contributions. This approach is supported by the County Council.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 97/1/19  <b>Name:</b> Clayson Country Homes	<b>Refers to:</b> Policy 37	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In respect of Policy 37, it is considered that the second sentence of the first paragraph could be removed to avoid repetition with the acute content of Policy 36.	<b>Suggested changes:</b> In respect of Policy 37, it is considered that the second sentence of the first paragraph could be removed to avoid repetition with the acute content of Policy 36.	<b>Officer comments:</b> It is agreed that this is a duplication. Modify the plan to remove the second sentence of first paragraph as it duplicates Policy 36.
<b>Representation reference:</b> 195/1/18  <b>Name:</b> Mr B Cheer	<b>Refers to:</b> Policy 37	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In respect of Policy 37, it is considered that the second sentence of the first paragraph could be removed to avoid repetition with the acute content of Policy 36.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> It is agreed that there is duplication. Modify the Plan to remove the second sentence of the first paragraph to Policy 37.
<b>Representation reference:</b> 197/1/11  <b>Name:</b> Northamptonshire County Council	<b>Refers to:</b> Policy 37	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> 9. It is noted that the Draft Plan specifies that major development (schemes of 10 residential units and above, and commercial developments of 1,00sqm and above) will be assessed on the basis of its impact on local infrastructure (Policy 37), and developer obligations may be secured towards	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Policy 37 should be read in conjunction with Policies INF1 and INF2 of the West

			<p>mitigating this where additional capacity is deemed to be required.</p> <p>10. In addition, it should be recognised that small sites (below 10 units / 1,000sqm) may still have a cumulative impact on existing provision and capacity, as does the continued application of permitted development rights to convert commercial premises to residential uses, when considered in conjunction with other development in a locality, and whilst s106 developer contributions would not normally be secured from these schemes there should be a recognition that their impact may still need to be mitigated and provision made through Section 106 agreements.</p>		Northamptonshire Joint Core Strategy.
<p><b>Representation reference:</b> 197/1/12</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 37</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b></p> <p>11. It is the recommendation of the County Council that all major residential and commercial developments should also be assessed on the basis of the need for additional Fire &amp; Rescue infrastructure (both on-site and off-site), which for example may require provision of additional fire hydrants, or contributions towards increasing capacity of fire and rescue facilities, services, and infrastructure to ensure that new development can be adequately served in the event of a fire.</p> <p>12. New developments and associated infrastructure within Northampton borough equates to an increase in visitors as well as traffic movements. This will inevitably lead to an increase in the spread of fire risk, which places additional demands on Fire and Rescue Service resources to ensure safe places are maintained, consistent with national Government expectations and guidance.</p> <p>13. Northamptonshire Fire and Rescue Service sets out its criteria for responding to incidents within its Standards of Operational Response (SOR). The standards outline how the Service will respond to different incident types which fall within</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			its statutory responsibilities under the Fire and Rescue Services Act 2004.		
<b>Representation reference:</b> 197/1/13  <b>Name:</b> Northamptonshire County Council	<b>Refers to:</b> Policy 37	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> Development coming forward during the Draft Plan period should be assessed to ensure that sufficient infrastructure is in place to accommodate the increased demand for services. This may result in a requirement for developer contributions to be secured, or for appropriate planning conditions to be applied to permissions granted, to ensure that adequate infrastructure is in place to enable fire, should it occur, to be effectively tackled.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 197/1/14  <b>Name:</b> Northamptonshire County Council	<b>Refers to:</b> Policy 37	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> The County Council supports the inclusion within Policy 37 of the need for land / suitable sites to be provided by development where necessary, in addition to financial contributions through developer obligations. The requirement for development to provide 'full fibre' connectivity to new build premises is also welcomed.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 197/1/16  <b>Name:</b> Northamptonshire County Council	<b>Refers to:</b> Policy 37	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> 18. The Draft Plan is underpinned by the West Northamptonshire Infrastructure Delivery Plan, which identifies the strategic infrastructure requirements necessary to support planned growth. It will be necessary to review this regularly with partners to ensure that the most up to date information is available to inform development, and to take into account any changes to proposed implementation schedules, which may result in bringing forward or pushing back delivery of key schemes to meet demand.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 197/1/25	<b>Refers to:</b> Policy 37	<b>Legal compliance and soundness:</b> Legal compliance: - not specified	<b>Comments:</b> 22. Continued engagement is welcomed with Northampton Borough Council, particularly as the Draft Plan is progressed and as the County Council's adopted Planning Obligations	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<p><b>Name:</b> Northamptonshire County Council</p>		<p><b>Soundness:</b> - not specified</p>	<p>Framework and Guidance (2015) document is updated. This will ensure that current priorities and policies of the County Council and NBC are aligned in relation to the planning and delivery of new education infrastructure and the ability to secure appropriate developer contributions through Section 106 to effectively mitigate the impact of development across different types of infrastructure.</p>		
<p><b>Representation reference:</b> 200/1/48</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 37</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 37 : Infrastructure Delivery &amp; Contributions Under Policy 37 developers are required to provide delivery of “full fibre” connectivity to new build development. The Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the Budget (11th March 2020), the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government will amend Part R “Physical Infrastructure for High Speed Electronic Communications Networks” of the Building Regulations 2010 to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. By taking these steps, the Government intends to overcome any existing market failure. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy. The policy will apply to all to new builds. Any type of technology may be used, which is able to provide speeds of over 1000 Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator. The new measures will place responsibilities on both developers and network operators :-</p> <ul style="list-style-type: none"> <li>• Developers will have to ensure new homes have gigabit broadband. This includes ensuring that the</li> </ul>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Paragraph 112 of the NPPF requires policies to support the expansion of electronic communications networks, including full fibre broadband connections. No modification required.</p>

			<p>physical infrastructure necessary for gigabit- capable connections is provided on site for all new build developments and homes are connected by an operator to a gigabit-capable connection ;</p> <ul style="list-style-type: none"> <li>• This requirement exists unless the cost to the developer of providing connectivity exceeds £2,000, or the operator declines to provide a connection ;</li> <li>• Developers must seek a second quote from network operators, where the first quote suggests that gigabit-capable broadband cannot be installed within the cost cap ;</li> <li>• If gigabit broadband exceeds the cost cap, the developer must provide connectivity to other technologies, which can provide at least superfast connection within the same cost cap, unless the operator declines to provide a connection ; and</li> <li>• A commitment to contribute to the costs of connection by network operators. Virgin Media has committed to contributing at least £500, rising in the case of some larger sites to £1,000. Openreach has committed to a combined Openreach and Developer Contribution of</li> <li>• £3,400, with a maximum developer contribution of £2,000.</li> <li>• As soon as Parliamentary time allows, the Government intends to lay the legislation to amend the Building Regulations. The supporting statutory guidance (Approved Documents) will also be published as soon as possible.</li> </ul>		
<p><b>Representation reference:</b> 200/1/50</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 37</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p><b>Comments:</b> It is also unclear if the requirements of Policies 36 and 37 have been included in the Council’s viability testing.</p>	<p><b>Suggested changes:</b> These policy requirements are unnecessary and repetitive of Building</p>	<p><b>Officer comments:</b> Policies 36 and 37 have been considered in the LPP2's Viability Assessment</p>

		<ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>		Regulations, which should be deleted.	(Appendix 1). No modifications required to Policies 36 and 37.
<p><b>Representation reference:</b> 229/1/29</p> <p><b>Name:</b> Barratt David Wilson Homes</p>	<b>Refers to:</b> Policy 37	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant:</p> <ul style="list-style-type: none"> <li>- not compliant with duty to cooperate</li> </ul> <p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p><b>Comments:</b> This relates to the comments made with regard to policy 35 with regard to electric infrastructure provision and the ability to consider the timely manner in which to impose requirements or obligations on any Consent.</p>	<p><b>Suggested changes:</b> Modification: Clarification is required in terms of the imposition of requirements or obligations.</p>	<p><b>Officer comments:</b> S106 obligations agreements are dealt with at the planing application stage. Policy 35 requires provision of electric vehicle charging points and does not mention rapid charging. Applicants will need to meet requirements set out in the relevant parking SPD and liaise with the Highways Authority as a part of their application process. No modification required.</p>
<p><b>Representation reference:</b> 250/1/21</p> <p><b>Name:</b></p>	<b>Refers to:</b> Policy 37	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In respect of Policy 37, it is considered that the second sentence of the first paragraph could be removed to avoid repetition with the acute content of Policy 36.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> It is agreed that this is a repetition. Modify the plan to remove the second</p>

St Clair Land and Developments LLP Old Bedford Road					sentence to Policy 37.
<p><b>Representation reference:</b> 251/1/29</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 37</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Policy 37 stipulates that ‘Developers are also required to provide delivery of “full fibre” connectivity to new build development. The Developers consider the Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in the statutory Building Regulations. In the Budget 2020 the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband<sup>28</sup>. The Department for Digital, Culture, Media and Sport subsequently outlined its intentions on the practical workings of this legislation through ‘Press Release: New-build homes to come gigabit-speed ready’<sup>29</sup>: ‘The government will amend building regulations to guarantee that all new homes have the right infrastructure to support gigabit broadband and housing developers must work with network operators to install internet speeds of over 1,000 megabits per second (Mbps) in new- build homes, up to a cost cap of £2,000 per dwelling.’ The Press Release confirmed the requirement will apply to all to new builds development, and that the new measures will place responsibilities on both developers and network operators:</p> <ul style="list-style-type: none"> <li>• Developers will have to ensure new homes have gigabit broadband. This includes ensuring that the physical infrastructure necessary for gigabit-capable connections is provided on site for all new build developments and homes are connected by an operator to a gigabit-capable connection;</li> </ul>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Paragraph 112 of the NPPF requires policies to support the expansion of electronic communications networks, including full fibre broadband connections. No change. Policy 37 has been considered in the LPP2’s Viability Assessment (Appendix 1). No change to Policy 37.</p>



			<ul style="list-style-type: none"> <li>• This requirement on the developer to provide a gigabit-capable connection exists unless the cost to the developer of providing connectivity exceeds £2,000, or the operator declines to provide a connection;</li> <li>• Developers must seek a second quote from network operators, where the first quote suggests that gigabit-capable broadband cannot be installed within the cost cap;</li> <li>• If gigabit broadband exceeds the cost cap, the developer must provide connectivity to other technologies, which can provide at least superfast connection within the same cost cap, unless the operator declines to provide a connection; and</li> <li>• A commitment to contribute to the costs of connection by network operators. Virgin Media has committed to contributing at least £500, rising in the case of some larger sites to £1,000. Openreach has committed to a combined Openreach and Developer Contribution of</li> <li>• £3,400, with a maximum developer contribution of £2,000.</li> </ul> <p>It also confirms that the legislation is to be laid as soon as parliamentary time allows and will be laid as secondary legislation so that it can be introduced quicker. As a result, the proposed requirements of draft Policies 36 and 37 are unnecessary and repetitive of Building Regulations and should therefore be deleted.</p> <p>Notwithstanding, the requirements of Policies 36 and 37 have not been included in the Council's Plan Viability Study (Aspinall Verdi, June 2020) and therefore it has not been demonstrated whether the policy requirements are viable.</p>		
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<p><b>Representation reference:</b> 148/1/19</p> <p><b>Name:</b> St Clair Land and Developments LLP</p>	<p><b>Refers to:</b> Chapter 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Turning to the site-specific allocations and policies which are addressed within Chapter 13, the respondent would first like to commend the bold approach which the Council have sought to adopt in clearly defining the significant number of development sites available within the Borough for all development typologies. It is considered that this approach provides landowners, including those with a legal interest, absolute clarity on the potential future options for the development of their land and property interests.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Welcomed.</p>
<p><b>Representation reference:</b> 250/1/22</p> <p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>	<p><b>Refers to:</b> Chapter 13</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Turning to the site-specific allocations and policies which are addressed within Chapter 13, the respondent would first like to commend the bold approach which the Council have sought to adopt in clearly defining the significant number of development sites available within the Borough. It is considered that this approach provides landowners, including those with a legal interest, absolute clarity on the potential future options for the development of their land and property interests.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 23/1/4</p> <p><b>Name:</b> University of Northampton</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The University fully supports allocation of Park and Avenue Campuses for residential redevelopment (allocations 1013 &amp; 1014 respectively) under emerging Policies 13 and 38. The University has now relocated to its new Waterside Campus. The University agrees that residential is the most appropriate and viable future use for the sites. Indeed, Park Campus has outline permission for the development of up to 800 homes and the initial phase is under construction. An application for residential development of Avenue Campus is with the Council for consideration.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

<p><b>Representation reference:</b> 30/1/9</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> I note that Site 0657 (Fraser Road) is in the list of proposed allocations. In the 2017 Sites Consultation Paper, this site was indicated as ‘not being taken forward for further investigation’. It then appeared as a residential allocation on the policies map for the previous local plan draft submission version consultation. I have no record of either a public or direct consultation from the council regarding changes to the site assessments. For many sites this would not be an issue but in this case the assessment for site LAA0657 states that the site ‘is not in proximity to any designated biodiversity or geodiversity site’. In fact the site is adjacent to Talavera East Potential Wildlife Site and within 1km of other local PWS, and Billing Arbours Local Wildlife Site. These could face increased visitor pressure – and its associated ecological impacts – as a result of residential development. While this might not have rendered site LAA0657 inappropriate for development it does suggest that other sites might have been incorrectly represented in the changes to the site assessments.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> In July 2019, the Government introduced a new set of guidelines in terms of what constitutes a “deliverable” housing site for the purposes of plan making. This meant that the Council was required to review its development plan allocations prior to submitting it to the Planning Inspectorate. The updates were also used to inform the preparation of the Five Year Housing land Supply for 2018/19. Policy 29 of the LPP2 recognises other biodiversity assets and has been strengthened to include reference to Potential Wildlife Sites and that applicants are required to protect or enhance these.</p>
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<p><b>Representation reference:</b> 35/1/7</p> <p><b>Name:</b> Historic England</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Unsound.</p>	<p><b>Suggested changes:</b> Subject to changes to the site specific allocations.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 57/1/3</p> <p><b>Name:</b> Hardingstone Parish Council</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> Whilst this states “Any proposal that comes forward should include suitable measures to mitigate the impact of additional traffic generated by the development” the council does not see how this can be done. There is already plans for 1000 houses as part of Hardingstone SUE and potential 500 from Hampton Green development. Newport Pagnell Road and others in the area are not suitable for this increased volume of traffic. We understand that the joint core strategy stated that with the Hardingstone SUE this area would be just about sustainable, so how can this extra traffic be justifiable. It is our belief that a lot of cars will be leaving on the Newport Pagnell Road to go to the A45 North, or South to M1 Junction 15 creating grid lock on the Queen Eleanor roundabout and J15 roundabout.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Traffic modelling has been undertaken by Northamptonshire County Council on behalf of Northampton Borough to assess the potential impacts of the development allocations proposed in the local plan and mitigation is a requirement of the policy.</p>
<p><b>Representation reference:</b> 57/1/4</p> <p><b>Name:</b> Hardingstone Parish Council</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> There are also concerns that overdevelopment in this area could cause flooding on Brackmills estate.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Statutory consultees have been consulted and the policy in the local plan has been amended to reflect flooding concerns.</p>

<p><b>Representation reference:</b> 57/1/5</p> <p><b>Name:</b> Hardingstone Parish Council</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> Overall the council feels there needs to be some joined up thinking in developments. There is a lot of development already approved along the Newport Pagnell Road and there are more on the proposed list which could cause serious infrastructure issues. The council also wonders if the numbers of housing needed needs reviewing in a post-covid world when the ways people commute may change.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The local plan seeks to deliver the housing requirements set out in the Joint Core Strategy and the allocation of sites has been based on evidence.</p>
<p><b>Representation reference:</b> 65/1/11</p> <p><b>Name:</b> English Regional Transport Association</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both 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 the 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</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>

			the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).		
<b>Representation reference:</b> 65/1/17  <b>Name:</b> English Regional Transport Association	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Housing: Since the above housing development(Site no.0333) is close to the main railway line, there should not be any housing development on that site. Moreover this could obliterate old railway track-beds. In any case the housing will encourage more road traffic, and the town's roads are frequently congested.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> This site has been assessed in the Site Assessment Methodology and Land Availability Assessment (SAMLAA) which includes detailed investigations on matters associated with transport connections and sustainability. All development sites put forward in the Local Plan Part 2 have been modelled to assess their potential transport implications on the impact on the network.
<b>Representation reference:</b> 68/1/1  <b>Name:</b> Highways England	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> 1104 Watering Lane, Collingtree - 265 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 68/1/2	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b>	<b>Comments:</b> 1025 Land to the west of Towcester Road - 180 dwellings	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<b>Name:</b> Highways England		Legal compliance: - not specified  Soundness: - not specified	There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.		
<b>Representation reference:</b> 68/1/3  <b>Name:</b> Highways England	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> 0168 Rowtree Road - 131 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 68/1/4  <b>Name:</b> Highways England	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> 0168 Rowtree Road - 131 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 68/1/5  <b>Name:</b> Highways England	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> 0333 Northampton Railway Station rail freight - 200 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 68/1/6  <b>Name:</b> Highways England	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness:	<b>Comments:</b> 1098 The Green, Great Houghton - 800 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

		- not specified	Assessments in order for their impacts to be appropriately assessed.		
<b>Representation reference:</b> 68/1/7  <b>Name:</b> Highways England	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> 1113 Greyfriars - 400 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 68/1/8  <b>Name:</b> Highways England	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> 1140 Land north of Milton Ham - 224 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 68/1/9  <b>Name:</b> Highways England	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Soundness: - not specified	<b>Comments:</b> 1142 Land west of Northampton South - 130 There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 68/1/10  <b>Name:</b>	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Legal compliance: - not specified	<b>Comments:</b> It is noted that the employment policies set out in the plan support the Northampton Economic Growth Strategy 2020-2025 adopted by the Council in May 2020. A few employment	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The site area of each site can be seen in the SAMLAA



Highways England		Soundness: - not specified	sites have been allocated however the sizes have not been specified.		document. The number of jobs created will be dependent on the types of employment that will subsequently occupy the site.
<b>Representation reference:</b> 97/1/21  <b>Name:</b> Clayson Country Homes	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In direct response to Policy 38, the respondent welcomes the reference to site 1025: land to the west of Towcester Road, and the conclusions within out earlier submissions in respect of this site remain. The site is, suitable, available and achievable and would secure a viable residential development.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 123/1/8  <b>Name:</b> Henry Martin Ltd	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective	<b>Comments:</b> Policy 38 - Development Allocations (residential, employment, education and mixed use) Henry Martin Ltd is encouraged to see that the 1.4-hectare site to the north of Martin's Yard Business Park is sll identified as an employment allocation in Policy 38 (Site 1005). Henry Martin Ltd strongly support this proposed employment allocation.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 148/1/3  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> However, the inclusion of the site (Ref: 1101) as an employment allocation within emerging Policy 18 of the DPD has afforded the landowner a level of confidence to progress technical work in respect of the future development of the site.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 148/1/6  <b>Name:</b>	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> It is agreed that an important challenge for Northampton, which the emerging LPP2 should seek to meet is that of housing delivery, However, to ensure that the significant level of residential growth proposed through the plan is sustainable,	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

St Clair Land and Developments LLP		Plan is sound.	this development needs to be delivered in tandem with strategic level employment growth to ensure that rising employment needs are met. Additionally, through increasing the level of land for economic development purposes within the town, the LPA will be going some distance in bolstering the trend of in-commuting and create a robust hub within the Borough to assist the wider growth across the County.		
<b>Representation reference:</b> 148/1/7  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> The document's acknowledgement of the challenges faced within the legislative boundary of Northampton is welcomed and only serves to highlight the significant opportunity which greenfield sites, such as the client's, offer to meeting the existing and future development needs of the Borough.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 148/1/20  <b>Name:</b> St Clair Land and Developments LLP	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> In direct response to Policy 38, the respondent once again welcomes the reference to site 1101 Land at Waterside Way, and the conclusions within our earlier submissions in respect of this site remain. The site is, suitable, available and achievable and would secure a viable residential development.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 172/1/4  <b>Name:</b> Homes England	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Soundness: - not specified	<b>Comments:</b> Homes England are taking forward landholdings throughout Northampton and welcome the following sites' allocation for housing and / or housing led development in Policy 13 Residential and Other Residential Led Allocation and Policy 38 Development Allocations. Ransome Road Gateway Gate Lodge, The Green, Great Houghton, Upton Reserve Site, Ransome Road.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 185/1/11	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> We are pleased to see that the boundary of this allocation for 23 dwellings has been modified so that it no longer includes a section of Kingsthorpe Meadows Local Nature Reserve and	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>		<p>Plan is sound.</p>	<p>Local Wildlife Site. Kingsthorpe Meadows already receives a high number of visitors and therefore, any additional pressure from new developments is concerning. For this allocation to be in line with Policies 27 (Green Infrastructure) and 29 (Supporting and Enhancing Biodiversity) it will need to carefully consider how it will provide a net gain in biodiversity within the application site and also contribute towards the enhancement of the wider green infrastructure in the area, including Kingsthorpe Meadows.</p>		
<p><b>Representation reference:</b> 185/1/13</p> <p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> This policy has also been improved since the previous version of the Local Plan Part 2; however, it is still of concern as its potential link to the Upper Nene Valley Gravel Pits Special Protected Area (SPA) has not been established. The Habitats Regulations Assessment and Policy 41 requests that over-wintering bird surveys should be conducted to investigate the importance of the allocation to the SPA and, using the results of these surveys, to suggest suitable mitigation measures; if it is possible to do so. The area suggested for ecological enhancement within the proposal (Figure 20) seems to have been chosen for landscape rather than biodiversity reasons and is likely to be used for recreation and therefore to be highly disturbed. Policy 41 also lists a range of other issues to be considered within this allocation. We would strongly recommend that the over-wintering bird surveys are carried out as soon as possible so that the importance of the allocation (as functionally linked land) to the SPA and the mitigation/compensation which may be required are clearly established and used to reassess the suitability of the allocation.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Surveys are expected to be undertaken by the applicant and will be advised to undertake surveys at the outset. No change.</p>
<p><b>Representation reference:</b> 195/1/20</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> In direct response to Policy 38, the respondent welcomes the reference to site 1107: Former Abington Mill Farm, Land of Rushmere Road, and the conclusions within out earlier</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

<p><b>Name:</b> Mr B Cheer</p>		<p>Plan is sound.</p>	<p>submissions in respect of this site remain. The site is, suitable, available and achievable and would secure a viable residential development.</p> <p>However, we are aware of certain literature which has been circulating within the locale which seems to be seeking to encourage a swell of objection to the allocation of this site for residential purposes. The literature which has been circulated relates to two matters, the first being highways issues and the second being a conflict with planning policy. Given the content of the emerging Part 2 Local Plan, which allocates the site for residential development, the submissions which we expect the Council to receive are inadmissible. In terms of the highways issues which will be highlighted by respondents, it is confirmed by the respondent that any future application for the site will be supplemented by a full range of technical documents including a transport and highways assessment which will demonstrate the site's suitability and achievability.</p> <p>In conclusion, whilst it is considered that whilst the document would benefit from revisions as set out above, the document does present a plan led approach to meeting those issues which are faced within the Borough. Given the acute housing needs issues faced in the area in recent years, it is considered that the emerging development plan document provides a positive vision and outlines a bold approach and framework to meeting both housing needs and other economic, social and environmental priorities.</p>		
<p><b>Representation reference:</b> 197/1/15</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b></p> <p>16. It is noted that the Draft Plan considers whether additional sites may need to be allocated to ensure that the overall strategic housing requirement for the borough (18,870) can be delivered up to 2029.</p> <p>17. Collectively, it is inevitable that any additional allocations will place further pressures on existing infrastructure and as such it is expected that measures will need to be taken to address these, through securing developer contributions to</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			support delivery of additional capacity where required as a result of development.		
<p><b>Representation reference:</b> 200/1/9</p> <p><b>Name:</b> HBF</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The Northampton LPP2 deals only with housing shortfalls from the five SUEs located in the Borough by proposing additional housing land allocations. The LPP2 allocates 71 housing / housing led sites for circa 3,804 dwellings as set out in Policies 13 &amp; 38. Housing delivery is maximised, where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. The LPP2 allocations include a wide range of sites by both size and market locations, which should provide access to suitable land for small local, medium regional and large national housebuilding companies as well as providing opportunities for a wide range of different types of dwellings to meet the housing needs of all households.</p> <p>Under the 2019 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The Council should confirm compliance with this aspect of national policy.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The SAMLAA investigations concluded that 52% of sites allocated for housing are under 1 hectare.</p>
<p><b>Representation reference:</b> 232/1/9</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not “sound” (para. 35 of the NPPF), in being neither “justified” (in not being “an appropriate strategy”) nor “effective” (in not being “deliverable over the Plan period”). Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites</p>	<p><b>Suggested changes:</b> Would like sites 0168, 1009 and 1142 considered as 1 large site.</p>	<p><b>Officer comments:</b> Agreed.</p>

			0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.		
<p><b>Representation reference:</b> 232/1/12</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Vistry and Lagan have commissioned Define to determine the housing capacity of the land between the NSSUE and the railway line, taking account of the constraints affecting that capacity (noise and air pollution from the M1 motorway; noise and vibration from the Northampton Loop Line railway; the floodplain of the Wootton Brook; hedgerows within the site; utilities easements crossing the site; and land needed for public open space, children’s play provision and surface water drainage attenuation). Assuming a suitable average net density of 40 dwellings per hectare, Define has determined that the land between the NSSUE and the railway line can accommodate some 336 dwellings.</p> <p>The Council currently proposes 361 dwellings across the three sites (0168, 1009 and 1142), which would require an inappropriately high average net density of around 43 dwellings per hectare, resulting in an urban form that would be discordant with the average net density of 35 dwellings per hectare within the adjacent NSSUE. We consider that the ‘excess’ 25 dwellings that it is inappropriate to accommodate on sites 0168, 1009 and 1142 can and should be accommodated within the NSSUE itself, where it would be appropriate to increase the net density of housing in close proximity to its local centre and primary school above the currently permitted 35 dwellings per hectare. In this way, that area of the NSSUE close to its facilities can serve appropriately as its core.</p>	<p><b>Suggested changes:</b> Consider the LPP2 indicative capacity is too high for sites LAA0168, 1009 and 1142 and that the excess should be accommodated within Northampton South SUE.</p>	<p><b>Officer comments:</b> The current capacity of sites LAA0168, 1009 and 1142 in Policy 13 is indicative and not confirmed. However, as the sites is recommended to be combined, it is acceptable to change the trajectory. Modify the plan to take into account the revised trajectory for the combined sites.</p>

<p><b>Representation reference:</b> 232/1/18</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p><b>Suggested changes:</b> Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p><b>Officer comments:</b> The respondent commented that these sites should be combined and a revised trajectory provided. This recommendation is considered acceptable. Modify Policies 13 and 38 and the Policies Map to reflect the recommended combined sites.</p>
<p><b>Representation reference:</b> 233/1/9</p> <p><b>Name:</b> Lagan Homes</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not “sound” (para. 35 of the NPPF), in being neither “justified” (in not being “an appropriate strategy”) nor “effective” (in not being “deliverable over the Plan period”). Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites 0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.</p>	<p><b>Suggested changes:</b> Would like sites 0168, 1009 and 1142 considered as 1 large site.</p>	<p><b>Officer comments:</b> This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the combined sites 0168, 1009 and 1142.</p>

<p><b>Representation reference:</b> 233/1/12</p> <p><b>Name:</b> Lagan Homes</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> Vistry and Lagan have commissioned Define to determine the housing capacity of the land between the NSSUE and the railway line, taking account of the constraints affecting that capacity (noise and air pollution from the M1 motorway; noise and vibration from the Northampton Loop Line railway; the floodplain of the Wootton Brook; hedgerows within the site; utilities easements crossing the site; and land needed for public open space, children’s play provision and surface water drainage attenuation). Assuming a suitable average net density of 40 dwellings per hectare, Define has determined that the land between the NSSUE and the railway line can accommodate some 336 dwellings.</p> <p>The Council currently proposes 361 dwellings across the three sites (0168, 1009 and 1142), which would require an inappropriately high average net density of around 43 dwellings per hectare, resulting in an urban form that would be discordant with the average net density of 35 dwellings per hectare within the adjacent NSSUE. We consider that the ‘excess’ 25 dwellings that it is inappropriate to accommodate on sites 0168, 1009 and 1142 can and should be accommodated within the NSSUE itself, where it would be appropriate to increase the net density of housing in close proximity to its local centre and primary school above the currently permitted 35 dwellings per hectare. In this way, that area of the NSSUE close to its facilities can serve appropriately as its core.</p>	<p><b>Suggested changes:</b> Consider the LPP2 indicative capacity is too high for sites LAA0168, 1009 and 1142 and that the excess should be accommodated within Northampton South SUE.</p>	<p><b>Officer comments:</b> The current capacity of sites LAA0168, 1009 and 1142 in Policy 13 is indicative.</p>
<p><b>Representation reference:</b> 233/1/18</p> <p><b>Name:</b> Lagan Homes</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the</p>	<p><b>Suggested changes:</b> Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p><b>Officer comments:</b> This recommendation is considered acceptable. Modify the plan and the Policies Map to</p>



		- not effective	replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.		reflect the combined sites 0168, 1009 and 1142.
<b>Representation reference:</b> 236/1/3  <b>Name:</b> CPRE	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not consistent with national policy	<b>Comments:</b> All site specific policies which are within 3km of the Nene Valley should have a cross reference to Polices 27 and 30 Green Infrastructure and Upper Nene Gravel Pits . The Green at Gt Houghton has a cross reference to policy 30 but CPRE considers there are inconsistencies with other site specific policies , for instance Ransome Road which we consider is part of the Nene Valley green infrastucture corridor . We trust that these can be dealt with as part of the soundness exercise .	<b>Suggested changes:</b> All site specific policies which are within 3km of the Nene Valley should have a cross reference to Polices 27 and 30 Green Infrastructure and Upper Nene Gravel Pits.	<b>Officer comments:</b> All development proposals will be considered taking into account all the relevant policies contained in the local plan.
<b>Representation reference:</b> 239/2/2  <b>Name:</b> Duncan Investments Ltd - Houghton Gate	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> In order to ensure that the Policy approach taken in Chapter 8 is sound it is considered that the NLP2 should allocate sufficient employment land to address the very significant quantitative and qualitative shortfall of industrial and warehousing land.  The Houghton Gate site should be identified as an employment allocation to help meet this shortfall.  The Houghton Gate site has the potential to help support a range of economic aspirations at the local and sub-regional level, particularly in terms of meeting Northampton Borough’s future growth needs.	<b>Suggested changes:</b> See detailed comments.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 239/2/3  <b>Name:</b>	<b>Refers to:</b> Policy 38	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> Duncan Investments Ltd is currently seeking the allocation of the Houghton Gate site for employment development through the emerging NLP2. In August 2018, Duncan Investments Ltd	<b>Suggested changes:</b> Allocation of Houghton Gate for employment use.	<b>Officer comments:</b> A Sites Allocation Methodology and Land Availability

<p>Duncan Investments Ltd - Houghton Gate</p>		<p>Plan is unsound:  - not positively prepared  - not justified  - not effective  - not consistent with national policy</p>	<p>submitted the site to the Local Plan Review 'call for sites' as a site for employment use. In June 2019, representations were submitted on the NLP2 Submission Draft Consultation (Round 1). However, the Houghton Gate site has not been allocated for employment use in the Round 2 Submission plan.</p> <p>Duncan Investments Ltd considers that the NLP2 fails to adequately and positively plan for new employment investment in line with the recommendations of the Council's own evidence base, and it is vitally important that land is allocated for employment development. It is considered that, the Houghton Gate site would be make a sustainable and important contribution to employment land supply and should therefore be allocated for employment use.</p> <p>Representations have also been prepared in response to the West Northamptonshire Strategic Plan [WNSP] Issues Consultation (October 2019) seeking the allocation and delivery of new employment land around Northampton, to help meet demand.</p> <p>Duncan Investments Ltd, is a local developer with a 35-year track record of developing around Northampton. Duncan Investments Ltd control all of the land which has no title or agricultural tenancy restrictions and would seek to bring the site forward immediately such that it would be delivered within the first 5 years of the Northampton Local Plan period.</p>		<p>Assessment (SAMLAA) has been produced as supporting evidence for the LPP2. The site (LAA0593 – North of Bedford Road) has been assessed as a part of the site selection process used in the SAMLAA for the LPP2. The site has been found to be unsuitable for allocation due the potential impact on the village of Great Houghton and its heritage assets, and due to its proximity to the Upper Nene Valley Gravel Pits SPA and Ramsar Site. No change.</p>
<p><b>Representation reference:</b> 239/2/9</p> <p><b>Name:</b>  Duncan Investments Ltd - Houghton Gate</p>	<p><b>Refers to:</b>  Policy 38 and Employment allocation</p>	<p><b>Legal compliance and soundness:</b>  Plan is legally compliant.</p> <p>Plan is unsound:  - not positively prepared  - not justified  - not effective</p>	<p><b>Comments:</b>  Duncan Investments Ltd considers that the only way to achieve this aim is through the allocation of additional employment sites, including land at Houghton Gate. Evidence has been provided to justify the proposed allocation including an Employment Land Needs Assessment which undertook the following actions:</p> <ol style="list-style-type: none"> <li>1. reviewed key planning policy documents and economic growth studies produced for Northampton as well as other published sub-regional studies and information that relate to</li> </ol>	<p><b>Suggested changes:</b>  Require Houghton Gate to be allocated.</p>	<p><b>Officer comments:</b>  NBC have met with the landowner and consultant, and requested sight of the evidence base which was never received (including Natural England's assessment of the</p>

		- not consistent with national policy	economic strategies, property markets, and relevant business and economic statistics; 2. interrogated latest available economic data and forecasts produced by Experian and reviewed other relevant commercial property market data; 3. reviewed commercial property market information for the Northampton area, particularly in relation to prevailing market dynamics and the need for strategic sites based on a Market Analysis undertaken by TDB Real Estate (reproduced in Appendix 1 of the ELNA); and, 4. assessed the proposed scheme at Houghton Gate in terms of the potential scale of the economic impacts of the site.		site). No modification required.
<p><b>Representation reference:</b> 239/2/10</p> <p><b>Name:</b> Duncan Investments Ltd - Houghton Gate</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Duncan Investments Ltd considers that the policy approach in Chapter 8 of the NLP2 would not meet the tests of soundness because:</p> <p>1. It is not Positively prepared: There is a clear need for additional industrial and warehousing land in Northampton from both a quantitative and qualitative perspective. The policy approach taken fails to adequately promote economic development and the furtherance of economic growth. It fails to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.</p> <p>2. It is not justified: The policy approach does not align with the Local Plan evidence base which concludes that there is an insufficient supply of large-scale units to meet demand over the course of the plan period. In addition, the JPU's current employment land evidence base's conclusion, that there is a need for 28,500 new jobs and 965,009 sqm of B- Class land, is flawed, makes no provision for losses, and is out of date given that this level of jobs growth has already been comfortably exceeded with no mechanism in place for identifying needs post 2029.</p>	<p><b>Suggested changes:</b> In order to ensure that the Policy approach taken in Chapter 8 is sound it is considered that:</p> <p>1. The NLP2 should allocate sufficient employment land to address the very significant quantitative and qualitative shortfall of industrial and warehousing land.</p> <p>2. The Houghton Gate site should be identified as an employment allocation to help meet this shortfall.</p>	<p><b>Officer comments:</b> Allocations for employment are included in Policy 38. Policy 17 safeguards existing employment land and Policy 18 supports employment provision outside of safeguarded employment sites that meet certain criteria. Employment land is also expected to come forward on Sustainable Urban Extensions around Northampton. No modification required.</p>

			<p>3. It is not effective: The NLP2 fails to identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. Planning policies should also be flexible to accommodate needs not anticipated in the Plan; and address the specific requirements of different industrial sectors. This is particularly relevant in the context of Northampton Borough's very substantial unmet industrial needs which risks undermining its future economic growth.</p> <p>4. It is not consistent with national policy: It does not contribute to the achievement of sustainable development, including the economic objective in the Framework to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.</p>	<p>The Houghton Gate site has the potential to help support a range of economic aspirations at the local and sub-regional level, particularly in terms of meeting Northampton Borough's future growth needs.</p>	
<p><b>Representation reference:</b> 242/1/3</p> <p><b>Name:</b> Robert de Vito Boutin</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not consistent with national policy</p>	<p><b>Comments:</b> I believe the Northampton Local Plan to be unsound in two areas: it is not positively prepared in that there is land that could be added to the plan for development not currently included.</p>	<p><b>Suggested changes:</b> See other comments.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 242/1/4</p> <p><b>Name:</b> Robert de Vito Boutin</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared</p>	<p><b>Comments:</b> It is not consistent with national policy because according to Chapter 2 "Northampton Now" Section A "A Profile of Northampton" Subsection € "Housing" para 2.12 the Council has "not been able to meet its 5 year housing land supply as required by the Government". The shortfall to 2019 was 2,340 houses. Additionally, Chapter 2 Section B "Key Challenges and Opportunities for Northampton" subsection (a) "Challenges" ii</p>	<p><b>Suggested changes:</b> The proposed change that I consider necessary is to add a site of 9.62 acres in Great Houghton to Policy 38 "Development Allocations". The</p>	<p><b>Officer comments:</b> The allocated sites within the LPP2 have been assessed through the Sites Allocation Methodology and Land Availability Assessment</p>

		- not consistent with national policy	'Housing Delivery' para 2.50 states; "Evidence shows that the Borough does not have a 5 year housing land supply".	<p>site is former Glebe Land to the north of the railway line that bisects the village, west of the conservation area, south of the border with the former Great Houghton Preparatory School and Brackmills Industrial Estate. The land connects to the village directly via Rectory Close, an access road which already serves five houses. Having spoken with Noreen we have agreed that my submission will be sent via SurveyMonkey and a site map will be emailed separately to the Planning Policy Inbox under the subject "Former Glebe land at Great Houghton".</p> <p>It can be seen from the map of the village "Great Houghton in 1900"</p>	(SAMLAA) process against a variety of criteria. Site LAA0327 (Martins Farm) has been assessed through this process and has been found to be not suitable for allocation due to proximity to Great Houghton and issues associated with heritage and coalescence. No modification required.
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				<p>published in the “Great Houghton Conservation Area Appraisal &amp; Management Plan” Consultation Draft page 10 Para 4.4 that there was a building on the land at this time, located close to the northern boundary. There appears to be no trace of this building today, but the land has been built on in the past.</p> <p>Development could be residential, to help meet the housing shortage in the borough, or for an hotel to help meet the room shortage outlined in Chapter 2 of the Plan, Section A, subsection (g) “Tourism” para 2.26 and Table 4 ‘Northampton Projected Requirements for new Hotel Development 2019-</p>	
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				<p>2029' which gives the number of "Total New Hotel Rooms" required at between 298 and 553.</p> <p>Development would aim to be in line with all relevant policies. In addition, there are specific policies that relate to it and which it would aim to specifically satisfy:</p> <p>A: The number of houses or size of hotel would be appropriate specifically to support the economic, social and environmental conditions of Policy 1 "Sustainable Development". Residential development might consist of around 30 high value homes, providing each plot with an average of around</p>	
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				<p>a third of an acre of green space overall.</p> <p>B: Development would specifically aim to support Policy 2 “Placemaking” and the related Policy 3 “Design” in every respect, enhancing the unique village “feel” of Great Houghton with high quality buildings using suitable materials, even though it lies outside the Village Conservation Area.</p> <p>C: Development would specifically aim to support the requirements of Policy 4 “Amenity and Layout”. It has the distinct advantage of supporting Policy 27 “Green Infrastructure” and Policy 28 “Providing Open Spaces” in that it connects Great Houghton</p>	
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				<p>village directly for the first time to the Brackmills Country Park (Parks and Gardens) and is well within the maximum 720m walk from the large area of "Natural and Semi Natural Green Space" to the south.</p> <p>D: Development would specifically aim to support Policy 6 "Health and Wellbeing" by the nature of its location within a strong and vibrant village community.</p> <p>E: The land falls within the 3km zone adjacent to the Upper Nene Valley Gravel Pits Special protection Area, Ramsar Policies 29 &amp; 30, which are being satisfied by the development to the south of the village known as "The</p>	
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				<p>Green” (Policy 41). Any additional requirements to protect the local habitat and bird life will be met where appropriate.</p> <p>The site fits well with Northampton Borough Council’s Vision as set out in Chapter 3 “Vision and Borough Objectives” section (a) “Vision” para 3.2: “Northampton will provide a balanced range of high quality housing to meet differing housing needs and aspirations and offer an excellent quality of life for all its communities”.</p>	
<p><b>Representation reference:</b> 250/1/23</p> <p><b>Name:</b> St Clair Land and Developments LLP Old Bedford Road</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> In direct response to Policy 38, the respondent once again welcomes the reference to site 1138 Land to South of Bedford Road, and the conclusions within our earlier submissions in respect of this site remain. The site is, suitable, available and achievable and would secure a viable residential development.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

<p><b>Representation reference:</b> 251/1/30</p> <p><b>Name:</b> Duncan Investments Ltd - Site E of Towcester Rd</p>	<p><b>Refers to:</b> Policy 38</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The Developers support the inclusion of Site 1102 'Site east of Towcester Road' allocated for residential development, as set out on the Policies Map.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 65/1/14</p> <p><b>Name:</b> English Regional Transport Association</p>	<p><b>Refers to:</b> para. 13.4</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Housing: Since the above housing development(Site no.0333) is close to the main railway line, there should not be any housing development on that site. Moreover this could obliterate old railway track-beds. In any case the housing will encourage more road traffic, and the town's roads are frequently congested.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> This site has been assessed in the Site Assessment Methodology and Land Availability Assessment (SAMLAA) which includes detailed investigations on matters associated with transport connections and sustainability. All development sites put forward in the Local Plan Part 2 have been modelled to assess their potential transport implications on the impact on the network.</p>

<p><b>Representation reference:</b> 153/1/1</p> <p><b>Name:</b> Network Rail</p>	<p><b>Refers to:</b> para. 13.6 and Policy 39</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> The draft policy 39 states that “Network Rail has indicated that subject to the current and future freight/ commercial operation being moved elsewhere, this opens up the potential for the residual railway land to be developed”. Following discussion with Network Rail, it was concluded that this comment relates to para 13.6</p>	<p><b>Suggested changes:</b> Amend paragraph to read: "Network Rail has indicated that subject to the provision of a suitable replacement site to accommodate rail freight activities, this opens up the potential for the residual railway land to be developed".</p>	<p><b>Officer comments:</b> The changes recommended are considered acceptable. Modify the plan to state: Amend paragraph 13.6 to read: "Network Rail has indicated that subject to the provision of a suitable replacement site to accommodate rail freight activities, this opens up the potential for the residual railway land to be developed".</p>
<p><b>Representation reference:</b> 35/1/9</p> <p><b>Name:</b> Historic England</p>	<p><b>Refers to:</b> Policy 39</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The text is much improved and draws on the production of the HIA and its revisions to highlight the sensitivity and the levels of truncation in the inner bailey area and castle mound. The policy however remains unsound without amendment.</p>	<p><b>Suggested changes:</b> The first policy criteria bullet point should be amended to read “A high quality development that preserves and enhances the significance and appreciation of the former castle site, its designated components and their setting. Design and capacity</p>	<p><b>Officer comments:</b> it is agreed that a proposed modification will clarify the policy. Modify the first criteria bullet point to Policy 39 to read: "high quality development that preserves and enhances the significance and appreciation of the former castle site, its designated</p>

				<p>will be informed by detailed archaeological investigations and assessments in advance of development". This would ensure that the archaeology continues to guide the development that comes forward and ensures that Historic England can comment fully at planning application stage.</p> <p>Historic England would be happy to agree this and all other changes suggested below by SOCG.</p>	<p>components and their setting. Design and capacity will be informed by detailed archaeological investigations and assessments in advance of development"</p>
<p><b>Representation reference:</b> 53/1/12</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 39</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> We welcome the reference made to maximising the use of Sustainable Drainage Systems on site subject to a detailed assessment being prepared.</p> <p>As set out in the Proposed Submission Local Plan there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.</p>	<p><b>Suggested changes:</b> Add new paragraph to supporting text to read: There is an existing sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take</p>	<p><b>Officer comments:</b> It is agreed that an additional paragraph to support Policy 39 would clarify the position. It is recommended that the plan be modified to include a new paragraph to</p>

				<p>these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'</p>	<p>supporting text of Policy 39 to read: There is an existing sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'</p>
<p><b>Representation reference:</b> 53/1/13</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Policy 39</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> Add new criterion to Policy 39: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'</p>	<p><b>Suggested changes:</b> Add new criterion to Policy 39: 'the safeguarding of suitable access</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to the plan will strengthen</p>

Anglian Water Services Limited		Plan is unsound: - not effective		for the maintenance of foul drainage infrastructure.'	Policy 39. Modify the plan to include a new criterion to Policy 39: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'
<b>Representation reference:</b> 65/1/16  <b>Name:</b> English Regional Transport Association	<b>Refers to:</b> Policy 39	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Housing: Since the above housing development(Site no.0333) is close to the main railway line, there should not be any housing development on that site. Moreover this could obliterate old railway track-beds. In any case the housing will encourage more road traffic, and the town's roads are frequently congested.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> This site has been assessed in the Site Assessment Methodology and Land Availability Assessment (SAMLAA) which includes detailed investigations on matters associated with transport connections and sustainability. All development sites put forward in the Local Plan Part 2 have been modelled to assess their potential transport implications on the impact on the network.
<b>Representation reference:</b> 197/1/17	<b>Refers to:</b> Policy 39	<b>Legal compliance and soundness:</b> Legal compliance: - not specified	<b>Comments:</b> 19. All Site Specific Policies within this chapter (and in particular Policy 41) will require substantial mitigation	<b>Suggested changes:</b> Each of the Site Specific Policies should therefore be	<b>Officer comments:</b> All site specific policies will need to comply with other

<p><b>Name:</b> Northamptonshire County Council</p>		<p><b>Soundness:</b> - not specified</p>	<p>measures and supporting infrastructure to be provided, both for on-site and off-site measures.</p>	<p>amended to include specific reference to the importance of any scheme complying with Policy 37 – Infrastructure to ensure sustainability and address any negative impacts of development of this scale.</p>	<p>relevant generic development policies in the plan so it is not considered necessary to list them, including Policy 37.</p>
<p><b>Representation reference:</b> 234/1/9</p> <p><b>Name:</b> Diversified Property Fund For Charities</p>	<p><b>Refers to:</b> Policy 39</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The redevelopment of Northampton Railway Station and surrounding land is obviously a key aspiration for the NLPP2, with Policy 39 (and the supporting figure) providing details as to how these proposals should be delivered. The junction of Wilmington Terrace and St Andrew’s Road is identified for junction improvements as part of the proposals.</p> <p>Whilst the Trade Park is not accessed directly from this junction, Wilmington Terrace forms the southern boundary and St Andrew’s Road the western boundary of the Trade Park with the accesses points into the Trade Park being from junctions with these roads (Quorn Way and Francis Street).</p>	<p><b>Suggested changes:</b> It is essential that any junction improvements continue to ensure high quality and unfettered vehicular access into the Trade Park. If subsequent iterations of the plan are to contain additional information about these junction improvements DPFC would welcome the opportunity to be consulted and provide comments.</p>	<p><b>Officer comments:</b> Noted.</p>



<p><b>Representation reference:</b> 241/1/10</p> <p><b>Name:</b> British Horse Society</p>	<p><b>Refers to:</b> Policy 39</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Pedestrians and cyclists are included in the policy. Opportunities to expand the PRoW network and link to existing PRoW's are to be welcomed but not to disadvantage equestrians. Surfacing of routes should be considered by developers, for example the permeable and durable flexi-pave/rubber crumb is environmentally and economically more sustainable as well as suiting all users of new multi-use routes.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Minor modification proposed to Policy 32 to refer to integration with public rights of way.</p>
<p><b>Representation reference:</b> 65/1/8</p> <p><b>Name:</b> English Regional Transport Association</p>	<p><b>Refers to:</b> para. 13.10</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both 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 the 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 (also see APPENDIX D - Transport and Infrastructure Schedule).</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>

<p><b>Representation reference:</b> 65/1/9</p> <p><b>Name:</b> English Regional Transport Association</p>	<p><b>Refers to:</b> para. 13.11</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both 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 the 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 (also see APPENDIX D - Transport and Infrastructure Schedule).</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p><b>Representation reference:</b> 53/1/14</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 40</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.</p>	<p><b>Comments:</b> Policy 40 Martin's Yard Extension - SUPPORT We welcome the reference made to maximising the use of Sustainable Drainage Systems on site subject to a detailed assessment being prepared. Similarly we welcome the reference made to considering the location of the existing water main and foul sewer as part of</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			the site layout to ensure access can be maintained following construction.		
<p><b>Representation reference:</b> 65/1/10</p> <p><b>Name:</b> English Regional Transport Association</p>	<p><b>Refers to:</b> Policy 40</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both 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 the 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 (also see APPENDIX D - Transport and Infrastructure Schedule).</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p><b>Representation reference:</b> 123/1/2</p> <p><b>Name:</b> Henry Martin Ltd</p>	<p><b>Refers to:</b> Policy 40</p>	<p><b>Legal compliance and soundness:</b> Plan is unsound: - not effective</p>	<p><b>Comments:</b> Changes have been made to the Policies Map which have the potential to create ambiguity following the adoptions of the Northampton Local Plan Part 2. This is because Figure 19 in the Northampton Local Plan Part 2 Submission Draft Round 2</p>	<p><b>Suggested changes:</b> See other comments.</p>	<p><b>Officer comments:</b> Noted.</p>

			<p>shows that the area of land to the north of Martin's Yard Business Park is an employment allocation. This is confirmed in Policy 38 and Policy 40. However, the revised Policies Map does not show this area as an 'Employment Allocation Site' (which should be shaded in light purple). Instead, it shows the expansion site as 'Natural and Semi Natural Green Space' (shaded in light green) and a 'Local Wildlife Site' (brown dots). The policies that are associated with the 'Natural and Semi Natural Green Space' designation and the 'Local Wildlife Site' conflict with Policy 38 and Policy 40 which collectively seek to deliver new employment development on the 1.4-hectare site to the north of the Martin's Yard Business Park.</p> <p>The discrepancies outlined above give rise to policy conflicts, which threaten the deliverability of the Martin's Yard Extension (LAA1005) and thus make the Policies Map unsound. Should these discrepancies be rectified as set out below, it is considered that the Policies Map would be sound:</p> <ul style="list-style-type: none"> <li>* Identify the 1.4-hectare employment allocation to the north of Martin's Yard Business Park that is shown on Figure 19 in the Northampton Local Plan Part 2 Submission Draft Round 2 with light purple shading on the Policies Map.</li> <li>* Amend the 'Natural and Semi Natural Green Space' (light green shading), so that it does not overlap the site allocated for employment development (as per the Policies Map that accompanied the Local Plan Part 2 Submission Draft (April 2019)).</li> <li>* Amend the Policies Map so that the area covered by the 'Local Wildlife Site' designation does not prevent the 1.4-hectare employment allocation to the north of Martin's Yard Business Park coming forward for employment development in the future.</li> </ul> <p>Please refer to the accompanying written representations for further information.</p>		
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<p><b>Representation reference:</b> 123/1/9</p> <p><b>Name:</b> Henry Martin Ltd</p>	<p><b>Refers to:</b> Policy 40</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> Policy 40 - Martin's Yard Extension (LAA1005) Henry Main Ltd is pleased to see that, following discussions with the Council over recent years, the decision has been taken to allocate Site 1005 for employment development. The allocation of Site 1005 for employment uses will provide the owners of the site with the opportunity to reconfigure, upgrade and extend the Business Park. This will enable Martin's Yard Business Park to accommodate the expansion plans of the businesses currently operating from the site and also has the potential to attract new business investment to the area. Furthermore the allocation of Site 1005 for employment development accords with Policy S8(1) of the West Northamptonshire Joint Core Strategy which seeks to concentrate the majority of new job growth within the principal urban area of Northampton. Similarly, it will also make a positive contribution towards creating 28,500 new jobs in the West Northamptonshire area over the plan period in line with Policy S7 of the West Northamptonshire Joint Core Strategy. The above factor will make a positive contribution towards facilitating business growth and creating new job opportunities in accordance with paragraph 80 of the NPPF.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 123/1/10</p> <p><b>Name:</b> Henry Martin Ltd</p>	<p><b>Refers to:</b> Policy 40</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> Moreover, as set out in Policy 40, the allocation of Site 1005 for employment will create a unique opportunity for the site's owners to work proactively with the Council and other organisations to conserve, manage and enhance the Kingsthorpe Mire Local Wildlife Site. The exact nature of the ecological enhancements will be subject to detailed discussions with the Council as part of the planning process. It is envisaged that these ecological improvements will support the Council's future plans for the Kingsthorpe Mire Local Wildlife Site as set out in the Northampton Green Infrastructure Plan (May 2016).</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

			As a result, the allocation of Site 1005 for employment development will also make a positive contribution towards managing, conserving and enhancing the quality of Northampton's strategic green infrastructure network, biodiversity corridors and wildlife habitats in line with the general thrust of national and local planning policies.		
<b>Representation reference:</b> 123/1/11  <b>Name:</b> Henry Martin Ltd	<b>Refers to:</b> Policy 40	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective	<b>Comments:</b> Overall, it is considered that Policy 40 has been positively prepared, is a justified and effective approach to take towards the extension of Martin's Yard Business Park and is consistent with the NPPF.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 123/1/12  <b>Name:</b> Henry Martin Ltd	<b>Refers to:</b> Policy 40 and policies map	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective	<b>Comments:</b> As was the case with the Policies Map that accompanied the Local Plan Part 2 Submission Draft (April 2019), the Key for the Policies Map that accompanies the current Northampton Local Plan Part 2 Submission Draft Round 2 indicates that the sites on the Policies Map that are shaded in light purple are 'Employment Allocation Sites'. The employment allocation to the north of Martin's Yard Business Park was shaded in light purple on the Policies Map that accompanied the Local Plan Part 2 Submission Draft (April 2019) 2. However, it is noted that whilst Policy 40 (Martin's Yard Extension (LAA1005)) and Figure 19 of the Northampton Local Plan Part 2 Submission Draft Round 2 collectively confirm that the 1.4-hectare site to the north of Martin's Yard Business Park is subject to an employment allocation, this area is not shaded in light purple on the Policies Map that accompanies the current Northampton Local Plan Part 2 Submission Draft Round 2. Despite this, many of the other sites that were shaded light purple on the Policies Map for the Local Plan Part 2 Submission Draft (April 2019) are still shaded in light purple on the Policies	<b>Suggested changes:</b> To rectify these discrepancies, it is respectfully requested that the employment allocation to the north of Martin's Yard Business Park is shaded in light purple on the revised Policies Map.	<b>Officer comments:</b> It is agreed that the Policies Map need clarifying. Modify the Policies Map (site LAA1005) to highlight the area allocated for employment in purple.

			Map that accompanies the current Northampton Local Plan Part 2 Submission Draft Round 2.		
<b>Representation reference:</b> 123/1/14  <b>Name:</b> Henry Martin Ltd	<b>Refers to:</b> Policy 40 and policies map	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective	<b>Comments:</b> The Key for the revised Policies Ma implies that proposals affecting land identified as 'Natural and Semi Natural Green Space' will be assessed against Policy 28 (Providing Open Spaces). Policy 28 states: "New major developments must ensure that open spaces defined on the Policies Map are sustained or enhanced." It will not be possible to construct the new employment development identified in Policy 40 and sustain the existing amount of 'Natural and Semi Natural Green Space' on the site as required by Policy 28. Therefore, in its current format, the Policies Map gives rise to a conflict between Policy 40 and Policy 28.	<b>Suggested changes:</b> As such, it is respectfully requested that the area of land to the north of Martin's Yard Business Park that is identified as an employment allocation in Figure 19 of the Northampton Local Plan Part 2 Submission Draft Round 2 is removed from the 'Natural and Semi Natural Green Space' designation on the revised Policies Maip (as it was on the Policies Map that accompanied the Local Plan Part 2 Submission Draft (April 2019)).	<b>Officer comments:</b> It is agreed that the Policies Map need clarifying. Modify the Policies Map (site LAA1005) to highlight the area allocated for employment in purple.
<b>Representation reference:</b> 123/1/15  <b>Name:</b> Henry Martin Ltd	<b>Refers to:</b> Policy 40 and policies map	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective	<b>Comments:</b> Furthermore, the Key for the revised Policies Map implies that development proposals relating to a 'Local Wildlife Site' will need to comply with Policy 26 and Policy 29. Policy 26 relates to sites for burial space, so it would appear that reference to this policy has been included in error in the Key for the Policies Map. Policy 29 seeks to support and enhance biodiversity. As	<b>Suggested changes:</b> Changes to Policies Map.	<b>Officer comments:</b> It is agreed that the Policies Map need clarifying. Modify the Policies Map (site LAA1005) to highlight the area

			explained above, the site's owners intend to work with the Council and other organisations to conserve, manage and enhance the Kingsthorpe Mire Local Wildlife Site in the area of land to the north and east of the new employment site. The third bullet point in Policy 40 provides the necessary provisions to secure these ecological and green infrastructure enhancements and net biodiversity gains. Additionally, it is noted that the 'Local Wildlife Site' designation was not shown on the Policies Map that accompanied the Local Plan Part 2 Submission Draft (April 2019). In light of these factors, it is respectfully requested that the Policies Map is amended so that the area covered by the 'Local Wildlife Site' designation does not prevent the 1.4-hectare expansion site to the north of Martin's Yard Business Park from coming forward for employment development in the future.		allocated for employment in purple.
<p><b>Representation reference:</b> 197/1/18</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 40</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> 19. All Site Specific Policies within this chapter (and in particular Policy 41) will require substantial mitigation measures and supporting infrastructure to be provided, both for on-site and off-site measures.</p>	<p><b>Suggested changes:</b> Each of the Site Specific Policies should therefore be amended to include specific reference to the importance of any scheme complying with Policy 37 – Infrastructure to ensure sustainability and address any negative impacts of development of this scale.</p>	<p><b>Officer comments:</b> All site specific policies will need to comply with other relevant generic development policies in the plan so it is not considered necessary to list them, including Policy 37.</p>
<p><b>Representation reference:</b> 65/1/12</p>	<p><b>Refers to:</b> Chapter 13</p>	<p><b>Legal compliance and soundness:</b> Legal compliance:</p>	<p><b>Comments:</b> Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The route of the former</p>



<p><b>Name:</b> English Regional Transport Association</p>		<p>- not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened.</p> <p>Northampton North –West and Northern Relief Roads - These will both 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 the ERTA also wishes to see re-opened.</p> <p>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 (also see APPENDIX D - Transport and Infrastructure Schedule).</p>		<p>Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p><b>Representation reference:</b> 30/1/10</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> The second item in the bulleted list, regarding the opportunity to create woodland and other habitats, is not a criterion but an observation and in my view does not belong in the policy wording. It would be more appropriate in the supporting text.</p>	<p><b>Suggested changes:</b> The second item in the bulleted list, regarding the opportunity to create woodland and other habitats, is not a criterion but an observation and in my view does not belong in</p>	<p><b>Officer comments:</b> Agreed modification to Policy 41: Move second bullet criteria from Policy 41 to supporting text.</p>

				the policy wording. It would be more appropriate in the supporting text.	
<p><b>Representation reference:</b> 30/1/11</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p><b>Comments:</b> The seventh bullet refers to a buffer but does not indicate what is to be buffered, only where the buffer is to be located. I think some clarification on this point would help make the policy easier for case officers to deliver on the ground.</p>	<p><b>Suggested changes:</b> The seventh bullet refers to a buffer but does not indicate what is to be buffered, only where the buffer is to be located. I think some clarification on this point would help make the policy easier for case officers to deliver on the ground.</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to Policy 41 will provide clarification. Suggested modification in brackets ( ): A buffer is to be created, in the form of ecological enhancements and net increase in biodiversity within the area of search shaded green in the diagram (that separates the allocated site from Great Houghton, and Great Houghton from Brackmills Industrial Estate). Appropriate types of habitat and accessibility are to be determined following surveys for Special Protection Area birds</p>

<p><b>Representation reference:</b> 35/1/10</p> <p><b>Name:</b> Historic England</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> Sound. The policy amendments following the HIA are welcomed.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 53/1/15</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> Policy 41 The Green, Great Houghton -OBJECT (in part) - EFFECTIVE POLICY 41 Reference to the incorporation for Sustainable Drainage Systems was included in Policy 36 of the Propsoed Submission Local Plan (now Policy 41). However this appears to have been removed from the current version of the plan. To ensure the policy is effective we would ask that reference be made to the requirement to maximise the use of SuDs on site subject to a detailed assessment which appears in the other allocation site policies in the Part 2 Local Plan.</p>	<p><b>Suggested changes:</b> Add new criterion to Policy 41: 'Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS).'</p> <p>As set out in the Proposed Submission Local Plan there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to Policy 41 will strengthen it. It is recommended that the plan be modified and a new criterion be added to Policy 41: 'Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS).'</p>

				continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.	
<p><b>Representation reference:</b> 53/1/16</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> As set out in the Proposed Submission Local Plan there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.</p> <p>Add new paragraph to supporting text to read: There is an existing sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'</p>	<p><b>Suggested changes:</b> Add new paragraph to supporting text to read: There is an existing sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to would clarify the position with regards to the area in Anglian Water's ownership. Modify the plan by adding a new paragraph to the existing supporting text of Policy 41 to read: There is an existing sewer in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built</p>

				public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'	over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'
<b>Representation reference:</b> 53/1/17  <b>Name:</b> Anglian Water Services Limited	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective	<b>Comments:</b> Add new criterion to Policy 41: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'	<b>Suggested changes:</b> Add new criterion to Policy 41: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'	<b>Officer comments:</b> It is agreed that a proposed modification to the policy will strengthen it. Modify the plan by adding a new criterion to Policy 41: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'
<b>Representation reference:</b> 68/1/11  <b>Name:</b> Highways England	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Legal compliance: - not specified	<b>Comments:</b> The plan also explains that to accommodate The Green, Great Houghton residential allocation site for 800 dwellings, the eastern approach of the A45 Barnes Meadow junction would need upgrading including widening the bridge. We would	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

		Soundness: - not specified	welcome further engagement with the Council as this site progresses to determine the impacts on the A45.		
<b>Representation reference:</b> 105/1/2  <b>Name:</b> Great Houghton Parish Council	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> The Parish Council representation sets out below how the allocation of The Green at Great Houghton fails to meet the NPPF's tests of soundness. This representation shows that the allocation of this site is not positively prepared, justified, effective or consistent with national planning policy. Positively prepared To be positively prepared Local Plan Part 2 should provide "a strategy which, as a minimum, seeks to meet the area's objectively assessed need; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development." (NPPF, paragraph 35).	<b>Suggested changes:</b> See other comments.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 105/1/9  <b>Name:</b> Great Houghton Parish Council	<b>Refers to:</b> Policy 41 and Appendix C	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Northamptonshire County Council in their letter dated 3rd April 2020 concerning Traffic Modelling and Analysis make the following comments on The Green allocation: "As I have commented previously, the location and topography of site 1098 (The Green, Houghton) suggests that it will connect to The Green. This a minor unclassified road which is likely to require significant upgrading to accommodate development on this scale. While access from The Green is possible to both Newport Pagnell Road and Bedford Road, little traffic is heading to the latter which appears to be the result of the cumulative impacts of all the various developments in that area. The V/C ratios on the eastern Bedford Road approach to the Barnes Meadow interchange are in the 100-100% range in the AM peak do- minimum scenario (without the plan allocations) and are unchanged in the do-something scenario (with the plan allocations). The traffic flows difference plots show that flows	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around access to the site. Policy 37 requires major development proposals to contribute to infrastructure

			<p>are barely changed, but do indicate additional flow through the Brackmills industrial estate which would appear to be traffic avoiding the Bedford Road.</p> <p>Combined with knowledge of the existing traffic situation in the area, this would indicate that some significant upgrading of the eastern Bedford Road approach to the Barnes Meadow roundabout will be required, specifically the widening of the river bridge (which being so close to the A45 is a constraint on stacking capacity at the signal stop line).</p> <p>While this will not be cheap, it should be noted that the design of the bridge does enable relatively easy widening, as this was done on the similar structure west of the A45 some years ago. It should be noted that there is also a discernible movement off traffic off Newport Pagnell Road which is rat-running through Brackmills to reach the A45 at Brackmills Interchange, but this impact may be mitigated if it is easier for traffic from The Green to exit via Bedford Road.”</p> <p>21. This response fails to take account of any impact on the existing village of Great Houghton. Additional traffic generated by the development will have a severe impact on Great Houghton village.</p>		<p>associated with and resulting from the scheme.</p> <p>Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation).</p> <p>No modification required.</p>
<p><b>Representation reference:</b> 105/1/10</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> Policy 41 and Appendix C</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The County Council identify The Green – “as a minor unclassified road which is likely to require significant upgrading to accommodate development on this scale”. In reality this is an unlit single track road with passing places and blind bends. At the moment, the edges of the road break down, especially during winter, creating large potholes which need regular repair. There is frequent fly tipping in the passing places. At present this route does not cope with its current traffic usage.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around acces to the site.</p>

					<p>Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme.</p> <p>Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation).</p> <p>No modification required.</p>
<p><b>Representation reference:</b> 105/1/11</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> Policy 41 and Appendix C</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The Green is bordered by agricultural land and, whilst at a cost, this route could potentially be improved, such an improvement fails to take account of the extra traffic passing along the High Street in the village, a road which cannot be upgraded. Existing problems within the village will only deteriorate further.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around access to the site.</p>



					<p>Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme.</p> <p>Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation).</p> <p>No modification required.</p>
<p><b>Representation reference:</b> 105/1/12</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The impact of increased traffic along the village’s main thoroughfare, Great Houghton High Street, and at the junction of this route with the A428 Bedford Road to the north of the village needs to be re-considered.</p> <p>Great Houghton High Street (“The High Street”) runs north/south through the village and is single carriageway in both directions. The High Street is narrow, with parked cars at various points, especially where local homes have no off- street car parking. This reduces traffic speeds and creates numerous bottlenecks. Nevertheless, some drivers and cyclists speed, particularly when heading downhill in a northward direction.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around acces to the site.</p>

			<p>Pedestrians using the length of the High Street have to regularly cross the road as there is pavement on one side only in places. This includes children using school buses from Little Houghton Primary School and Wollaston School and anyone using the Village Hopper bus (they all stop at the White Hart pub).</p> <p>National Cycle Route 6 passes up the High Street from the disused railway line at the Glebe and then passes along the Green. It is well used and provides an opportunity to improve health and active lifestyles. However, there is an incompatibility between these aims and the additional traffic created by development at The Green that will use the cycle route, making it significantly less safe for cyclists and deterring users of this mode of travel.</p> <p>The High Street is not suitable for HGVs. Formal warning signs have been placed with regard to HGVs entering the village. This does not deter such use and leads to such vehicles mounting footways.</p> <p>There are roughly 300 homes in Great Houghton. If 800 new homes are to be built on The Green housing allocation, and assuming a minimum of 2 cars per new dwelling, 1,600 extra vehicles will potentially use The Green. The County Council assumption is that The Green (with significant upgrading) will be used, but that assumption fails to take into account the impact on the High Street, usage and detrimental impact will increase significantly.</p>		<p>Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme.</p> <p>Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation).</p> <p>No modification required.</p>
<p><b>Representation reference:</b> 105/1/13</p> <p><b>Name:</b></p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> At the north of the village the High Street meets the A428. The A428 has a 60mph speed limit. There have been accidents, including fatalities, at the junction. Villagers must use this junction and turn east to access the local school/Post</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Appendix C states that Transport Assessments will be required for</p>

Great Houghton Parish Council		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Office/church which are all in Little Houghton. This manoeuvre can take significant time and is difficult and dangerous to make.		development proposals. These may indicate the need for localised improvement works, particularly around access to the site. Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme. Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation). No modification required.
<b>Representation reference:</b> 105/1/14  <b>Name:</b>	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> 31. Additionally, although there are two lanes at the junction, the two-lane stretch is only a few car lengths long. So, once a handful of cars are waiting to turn east, those wishing to turn west and head into Northampton cannot get past them to	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Appendix C states that Transport Assessments will be required for

Great Houghton Parish Council		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	access the west bound lane and a queue forms up through the village. Given the wait time to turn, the queue moves slowly.		development proposals. These may indicate the need for localised improvement works, particularly around access to the site. Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme. Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation). No modification required.
<b>Representation reference:</b> 105/1/15  <b>Name:</b>	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> This effect is exacerbated when there is any problem on the A45 or the M1 (we also note that in their response dated 3rd November 2017 to the Sites Consultation, Highways England raised their concerns about new site allocations impact on the	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Appendix C states that Transport Assessments will be required for

Great Houghton Parish Council		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Strategic Route Network). The Green (see below) is the quickest route from Wootton to the A428 and cars use the High Street and Green as part of a cross country route between the A45/M1 and the A428. The wait time in particular to make the eastbound turn is then extended. Essentially, because of the slow turn, even just a few additional cars result in a significant wait. A queue of cars may also be seen waiting to turn south on the A428 to go south, up the High Street.  There is no way to widen the High Street, as there are houses on either side of its length. Much of this route is also within the Conservation Area.		development proposals. These may indicate the need for localised improvement works, particularly around access to the site. Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme. Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation). No modification required.
<b>Representation reference:</b> 105/1/16  <b>Name:</b>	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> The village and The Green site are poorly served by public transport. The Sustainability Appraisal refers to buses on the A428 Bedford Road. It is difficult to understand how these would be used by residents of The Green.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Policy 32 of the LPP2 requires developments to demonstrate

Great Houghton Parish Council		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	This is some 2km (straight line) distant from The Green site allocation. This is considered beyond reasonable for bus users to consider using. The bus stops on the A428 are already difficult for more nearby residents of Great Houghton village to use, particularly those with mobility problems, being accessed via the High Street, the problems of which have already been highlighted. Access for those going eastbound, or returning from Northampton, would also entail crossing the Bedford Road to gain access to the village/The Green site, there have been two recent fatalities in this area of bus users crossing this road. Bus is not considered an option for The Green site.		sustainable travel principles including accessibility and usability of public transport and maximising opportunities for walking and cycling. No modification required.
<b>Representation reference:</b> 105/1/17  <b>Name:</b> Great Houghton Parish Council	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	<b>Comments:</b> Great Houghton is a village which has grown organically through small developments. The centre of the village is a Conservation Area; this includes the portion of the High Street that would be affected by additional traffic and queueing. The development of 800 new dwellings is out of scale with the village and will begin the gradual erosion of the separation of the village from Northampton. The village will lose its separate identity. At the moment, leaving the village to the south and travelling towards The Green allocation land, beyond Leys Lane (the entrance to the village hall and playing field), one enters open countryside. This open land is an integral part of the setting of the village and its detachment from other built development. This is noted in the Conservation Area Appraisal "The visual separation between Great Houghton and the built-up area makes a major contribution to the setting and to the character and appearance of the Conservation Area." (page 16, <a href="https://www.northampton.gov.uk/info/200207/building_conservation_and_trees/1629/great_houghton_conservation_area">https://www.northampton.gov.uk/info/200207/building_conservation_and_trees/1629/great_houghton_conservation_area</a> ).	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Policy 41 of the LPP2 sets out that any proposed scheme will need to take into account the sensitivities and significance of the setting of Great Houghton and the Conservation Area. No modification required.

<p><b>Representation reference:</b> 105/1/18</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Allocation of this site will also lead to loss of Grade 2 agricultural land and functionally linked habitat for golden plover and lapwing linked to the Special Protection Area. On these matters the Council's own SAMLA concludes: "Significant negative effect likely on proximity of designated sites/ on avoid loss of greenfield land/ on avoid loss of high quality agricultural land." Rather than deal with these issues now Policy 41 merely says they will be subject to further study and suitbale mitigation.</p>	<p><b>Suggested changes:</b> Without knowing the impact development of The Green may have the site should not be allocated.</p>	<p><b>Officer comments:</b> The SAMLAA identifies loss of agricultural land but would contribute positively to housing provision. Surveys are required to understand further, whether the site is used for over-wintering birds associated with the Upper Nene Valley Gravel Pits SPA. If numbers are significant, offsite mitigation will be required for loss of habitat. No modification required.</p>
<p><b>Representation reference:</b> 105/1/19</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Additional residents will mean greater pressure on services including schools, doctors and dental surgeries etc. In particular, the local primary schools are Wootton, Caroline Chisholm and Preston Hedges, all of which are oversubscribed to the extent that applications are in some cases limited to those living within half a mile. Great Houghton's local primary school is in Little Houghton. This is a small village school (it currently has just under 100 pupils and is almost full) and would not have the necessary capacity for a development of this size. The development needs to be self-sustaining in this respect as existing resources are insufficient. This is a further drain on already scarce resources.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Policy 37 of the LPP2 requires major development proposals to contribute to the delivery of and where necessary provide land / suitable sites for new infrastructure associated with and resulting from the scheme. No</p>

			<p>Effective</p> <p>The third test of soundness concerns is the plan effective? This response has already demonstrated that the Local Plan Part 2 strategy is not deliverable over the plan period (see paragraphs 3 to 16 of this response).</p>		<p>modification required.</p>
<p><b>Representation reference:</b> 105/1/20</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b></p> <p>The Green housing land allocation would not enable sustainable development in accordance with the policies of the NPPF.</p> <p>Whilst The Green allocation would contribute to the national aim of increasing housing growth, this is unnecessary at this time, on an inappropriate site and comes with significant negative costs – many of which remain to be quantified. Paragraph 72 of the NPPF provides specific policy guidance for those seeking to identify large sites:</p> <p>“72. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy- making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:</p> <p>a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains; b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The proposed allocation at The Green, Great Houghton is located next to the large employment site of Brackmills. Existing public transport routes are located to the north and south of the site on the Bedford Road and the Newport Pagnell Road. Any proposal coming forward will need to adhere to Policy 37 of the LPP2 to ensure the relevant infrastructure is delivered in a timely manner to support housing. No modification required.</p>



			<p>c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;</p> <p>d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)<sup>35</sup>; and</p> <p>e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.”</p> <p>The Green is not well located or well supported by necessary infrastructure or facilities (paragraph 72a). The Green is not included within existing or planned investment for infrastructure – it will bring an additional and competing claim on such resources.</p> <p>The Green will not be a sustainable community (paragraph 72b). It will be car dependent with poor access to services, especially for those without access to a private car and limited access to employment opportunities. Neither of these will be available on site. Policy 41 fails to identify how any needed infrastructure improvements will be funded or provided; this is not consistent with paragraph 34 of the NPPF:</p> <p>“34. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.”</p> <p>By failing to quantify these needs the allocation of The Green undermines the deliverability of the WNJCS and Local Plan Part</p>		
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			<p>2, we note our earlier points, and the Council's own position, that delivery on large sites is persistently under delivering.</p> <p>Policy 41 does set out a set a parameters for the quality of the development (paragraph 72c).</p> <p>Policy 41 does not make a realistic assessment of likely rates of delivery (paragraph 72d) nor does it set out any mechanism for how the site can be delivered.</p> <p>Paragraph 72d is not considered relevant.</p> <p>Paragraph 103 of the NPPF states:  "Significan development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health."</p>		
<p><b>Representation reference:</b> 105/1/21</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:  - not positively prepared  - not justified  - not effective  - not consistent with national policy</p>	<p><b>Comments:</b> The Green allocation would be significant development and as has been shown elsewhere in this representation, development of this site is not sustainable: it does not limit the need to travel, there is no genuine choice of transport modes; as a result this will lead to increased congestion and have negative impacts on air quality and public health.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The proposed allocation at The Green, Great Houghton is located next to the large employment site of Brackmills. Existing public transport routes are located to the north and south of the site on the Bedford Road and the Newport Pagnell Road. Any proposal coming forward will need to adhere to Policy 37 of the LPP2 to ensure the relevant</p>

					infrastructure is delivered in a timely manner to support housing as well as other policies throughout the LPP2 which seek to improve air quality (such as Policy 32 (Designing Sustainable Transport and Travel) and Policy 35 (provision of facilities for electric vehicle charging points)). No modification required.
<p><b>Representation reference:</b> 105/1/22</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> The allocation of land at The Green as has been shown in this representation is unnecessary and not sustainable. The Parish Council seeks the removal of this allocation from Local Plan Part 2. If the Borough Council should disagree with this position and proceed with the allocation, the Parish Council will seek the following changes to Local Plan Part 2: a) Allocation of the area shaded green in Figure 20 of Local Plan Part 2as a green wedge. This will ensure continued separation of the proposed new development from Great Houghton village. b) Quantification of the traffic impact on The High Street, Great Houghton and identification of specific mitigation measures to avoid or mitigate these impacts. c) Surveys should be undertaken before the land is allocated to identify whether the site is used by over-wintering Golden Plover / Lapwing</p>	<p><b>Suggested changes:</b> If the Borough Council should disagree with this position and proceed with the allocation, the Parish Council will seek the following changes to Local Plan Part 2: a) Allocation of the area shaded green in Figure 20 of Local Plan Part 2 as a green wedge. This will ensure</p>	<p><b>Officer comments:</b> The Council completed an extensive Land Availability Assessment exercise to ascertain whether the sites are suitable, developable and deliverable prior to allocating them for development, as required by Government guidelines. There are policies in the</p>

			<p>i.e. to be carried out in the winter. If significant numbers of Golden Plover or Lapwing are identified at the site, offsite mitigation required for the loss of habitat should be identified as part of the allocation.</p>	<p>continued separation of the proposed new development from Great Houghton village.</p> <p>b) Quantification of the traffic impact on The High Street, Great Houghton and identification of specific mitigation measures to avoid or mitigate these impacts.</p> <p>c) Surveys should be undertaken before the land is allocated to identify whether the site is used by over-wintering Golden Plover / Lapwing i.e. to be carried out in the winter. If significant numbers of Golden Plover or Lapwing are identified at the site, offsite mitigation required for the loss of habitat should be</p>	<p>Local Plan which are designed to ensure that the scheme, and all development schemes in Northampton, deliver sustainable transport and travel, and appropriate mitigation.</p> <p>The Council does not currently have evidence to justify a green wedge policy. The ecological enhancement will act as a buffer between the existing village and the new development. Details of what constitutes ecological enhancements will be considered at development management stage. No modification required.</p>
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				identified as part of the allocation.	
<p><b>Representation reference:</b> 161/1/3</p> <p><b>Name:</b> Sarah Williams</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> (A) Not positively prepared: The proposed Local Plan allocates more land than is required to achieve the projected need – it is not justified per the Council’s own data. Other smaller, more sustainable and deliverable sites are identified - the Green is a large development but no additional services (e.g. schools, doctors etc) are proposed, so stretched local services are likely to be overwhelmed. (B) Not justified or effective:</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The LPP2 plans for a supply of more dwellings than is required by the West Northamptonshire Joint Core Strategy. This is due to building in contingency for previous under-delivery on the large SUE sites in and around Northampton. Smaller sites are allocated, that will be able to come forward quicker, in case of continued SUE under-delivery. Policy 37 of the LPP2 requires major development proposals to contribute to the delivery of and where necessary provide land / suitable sites for new infrastructure associated with and resulting from the</p>

					scheme. No modification required.
<p><b>Representation reference:</b> 161/1/4</p> <p><b>Name:</b> Sarah Williams</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> As mentioned above the site is not needed to meet projections and there are alternatives, while the proposed development at the Green would have a serious detrimental impact on the village of Great Houghton as follows: Traffic Traffic produced by the proposed development would have a major impact on the village: At the A428 turn The A428 has a 60mph speed limit. There have been accidents, including fatalities, at the junction. The right turn (e.g. to go the local school/Post Office/church which are all in Little Houghton) is difficult and dangerous to make – you often have a significant wait. Although there are two lanes at the junction, the two-lane stretch is only a few car lengths long. Once a few cars are waiting to turn right, those wishing to turn left and head into Northampton cannot get past them to access the left-hand lane and a queue starts to form up through the village. Given that each car turning right has to wait to turn, the queue moves slowly Use of the route from is underestimated and has not been being properly quantified. It is the quickest route between Wootton and the A428 and in continuous use. When there is a blockage on the M1 or A45, the number of cars visibly increases and a queue already forms up into the village. The village has approximately 300 homes. The proposed development comprises 800 houses. Assuming 2 cars per household, the development would produce an additional 1,600 cars. This is likely to produce significant daily queues at the A428 turn, affecting quality of life for villagers and those living on the development. There is no way to widen the High Street, as there are houses on either side all the way down. It is also within the Conservation Area. I cannot therefore see how this could be</p>	<p><b>Suggested changes:</b> The site should therefore not be allocated.</p>	<p><b>Officer comments:</b> Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around acces to the site. Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme. Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport</p>

			effectively mitigated, but in any event, the proposed plan contains no actual assessment of the potential effect. The site should therefore not be allocated.		schemes and mitigation). No modification required.
<p><b>Representation reference:</b> 161/1/5</p> <p><b>Name:</b> Sarah Williams</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> On the Green The Green is single track with no street lighting. People speed and are unused to using passing places. Large potholes form each winter which need repair. The road does not stand up to its current user and would need to be significantly improved. However, as it is surrounded by fields, it is capable of improvement. The High Street and the turn onto the A428 are not.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around acces to the site. Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme. Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport</p>

					schemes and mitigation). No modification required.
<p><b>Representation reference:</b> 161/1/6</p> <p><b>Name:</b> Sarah Williams</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Down Great Houghton High Street The High Street is single carriageway and has parked cars. At these points, the road effectively becomes a single-track with passing places. The High Street is a hill all the way down and drivers and cyclists speed. HGVs are currently a problem, given the width of the road. There is likely to be additional HGV traffic, especially associated with construction. If you need to walk from the top to the bottom of the village, you have to cross the road at least once as there is pavement on one side only in places at the top, middle and bottom of the village. This includes children using school buses from Little Houghton Primary School and Wollaston School and anyone using the Village Hopper bus (they all stop at the White Hart pub). More traffic means more risk to the safety of those crossing the road and other drivers. More exhaust emissions and environmental pollution (particularly if traffic is queuing) would lead to a loss of amenity and detrimental effect on the health and wellbeing of those living on or using the High Street. Additional rush hour traffic on the A428 and on the Newport Pagnell road Rush hour queues on the A428 into Northampton take an additional 20-30 minutes. If there is problem on the M1/A45, there is a solid line of cars going past the A428 turn and back towards Bedford and impeding exit from Great Houghton. The Queen Eleanor interchange is also busy. Additional traffic will make this worse.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around acces to the site. Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme. Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport</p>



					schemes and mitigation). No modification required.
<p><b>Representation reference:</b> 161/1/7</p> <p><b>Name:</b> Sarah Williams</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> National Cycle Route National Cycle Route 6 passes up the High Street from the disused railway line at the Glebe and then passes along the Green. It is well used, particularly during lockdown. There is currently greater emphasis on health and wellbeing and the benefits of exercise/an active lifestyle. More traffic would make it significantly less safe for cyclists.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Proposals that come forward for the site will need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation). No modification required.</p>
<p><b>Representation reference:</b> 161/1/8</p> <p><b>Name:</b> Sarah Williams</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified</p>	<p><b>Comments:</b> Loss of character and setting Great Houghton is a village which has grown piecemeal via smaller developments. The village includes a Conservation Area covering the High Street including that part which may be affected by queues. The effect on our village has not been adequately quantified but instead underestimated and glossed over. As well as the street scene (including within the Conservation Area) being affected, given the size of the development relative to the village and its proximity, the development will dwarf and potentially take over the village and so cause the village to lose its identity, not only from the development of houses but due</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Policy 41 of the LPP2 sets out that any proposed scheme will need to take into account the sensitivities and significance of the setting of Great Houghton and the Conservation Area. No modification required.</p>

		<ul style="list-style-type: none"> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p>to the volume of traffic and the overall disturbance caused by that, leading to a loss of character and setting. It moves the line of development marking the end of Northampton across the line of the village and is a move towards encirclement/swallowing of the village.</p> <p>At the moment, you leave the village via the Green and once you pass Leys Lane (the entrance to the village hall and playing field), you are immediately in open countryside. This is part of the feel and setting of the village and this detachment is noted in our Conservation Area designation. If this development went ahead, that would be lost.</p>		
<p><b>Representation reference:</b> 161/1/9</p> <p><b>Name:</b> Sarah Williams</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b></p> <p>Plan is not legally compliant:</p> <ul style="list-style-type: none"> <li>- not in accordance with SCI</li> <li>- not consistent with regulatory requirements</li> </ul> <p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p><b>Comments:</b></p> <p>Pressure on local services Additional residents will mean greater need in terms of school places and with doctors and dental surgeries etc. My children attend Little Houghton Primary School which is a small village school with around 85 pupils and most years are almost full. It could not cope with the additional pupils from a development of this size and I know from looking at schools for my children that the schools in Wootton are significantly oversubscribed. The development needs to be self-sustaining in this respect as existing resources are insufficient and there is no mention of this. Smaller more sustainable developments would be more easily catered for whereas the size of this development means it would not.</p> <p>(C) not consistent with national planning policy</p> <p>It is a development of a significant size but does not have any employment opportunities within the development and lacks services and supporting infrastructure. Bus services are very limited and the development would create significant traffic queues at various points for both Great Houghton and those living in the development. It is not sustainable by itself and the proposed plan does not identify how any improvements needed will be funded.</p>	<p><b>Suggested changes:</b> I therefore think the site should be removed from this allocation.</p>	<p><b>Officer comments:</b> The proposed allocation at The Green, Great Houghton is located next to the large employment site of Brackmills. Existing public transport routes are located to the north and south of the site on the Bedford Road and the Newport Pagnell Road. Any proposal coming forward will need to adhere to Policy 37 of the LPP2 to ensure the relevant infrastructure is delivered in a timely</p>

			The development will not enhance the environment or wellbeing of those either living in Great Houghton or in the development itself.		manner to support housing. No modification required.
<b>Representation reference:</b> 162/1/3  <b>Name:</b> Peter Summerside	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> This development should not proceed at all. Great Houghton village cannot cope with the 4,000 new vehicle movements per day that this development would generate.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Traffic modelling has been undertaken by Northamptonshire County Council on behalf of the Borough Council for this site to assess the potential traffic implications of the proposed development on the road network. Policy 32 requires that the transport impacts of new development are mitigated.
<b>Representation reference:</b> 162/1/4  <b>Name:</b> Peter Summerside	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> The proposals would also spoil the pleasant countryside around the village, diminishing its character and destroying local wildlife habitats.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Any proposal that comes forward will need to comply with the relevant policies contained in the development plan and provide relevant mitigation measures. A buffer is being proposed between the development site and the existing

					village. An objective of the Local Plan is the provision of green infrastructure, which includes biodiversity net gain as a condition of development.
<b>Representation reference:</b> 162/1/5  <b>Name:</b> Peter Summerside	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> If the scheme proceeds at all, far greater consideration should be given to : 1. Vehicle access improvements - the proposed development is on a single track road 2. Traffic calming in Great Houghton – particularly at the Southern end on The Green (which our property adjoins) – vehicles already thunder through here unhindered with no regard for the lives of pedestrians, pets or wildlife. 3. Protection of cyclists and pedestrians (cyclists use Great Houghton and its environs a lot). 4. Improved drainage and infrastructure – a lot of new homes will require significant infrastructure improvements. 5. Environmental and sound buffering between the development, Great Houghton village and Brackmills. 6. Air quality protection. 7. The conservation status of Great Houghton and its special characteristics which need protecting and preserving - it could easily be ruined and overrun by thoughtless mass housing development.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted and will be considered in greater detail at planning application stage if and when a proposal comes forward.
<b>Representation reference:</b> 162/1/6  <b>Name:</b> Peter Summerside	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> I hope you will listen to our concerns and act to protect this locality. Too many places have been permanently wrecked in Northants by thoughtless development.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.

<p><b>Representation reference:</b> 169/1/5</p> <p><b>Name:</b> William McFarland</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p><b>Comments:</b> There is however no mention of Canada Geese who each year (particulary during August and September) use the northern part of this area (and the southern part of the Diocese land adjacent) for stopping en route on their travels. I trust this, along with your other bird surveys referred to, will reduce the offsite mitigation and protect their habitat.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Applicants proposing development on site LAA1098 will need to liaise with Natural England to determine the relevant surveys that will need to be undertaken, in order to mitigate any disutbance to species. No modification required.</p>
<p><b>Representation reference:</b> 172/1/8</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> Homes England are undertaking technical studies of their landholding at The Green, Great Houghton to support the submission of an outline planning application for residential development. Homes England support the principle of development coming forward at this site and welcome the site's allocation in the Submission Draft Local Plan Part 2 as a Housing Allocation; Site Policy 41 The Green, Great Houghton; and on the Policies Map.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 172/1/9</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> Homes England's technical assessment of the site's capacity will include the determination of the extent and location of ecological enhancements needed to secure a net increase in biodiversity and include determination of the location of built development take into account and be sensitive to the significance and the setting of the Great Houghton conservation area and listed buildings there, as referenced in Paragraph 13.14.</p>	<p><b>Suggested changes:</b> Homes England therefore requests the following changes to Policy 41 and the diagram shown in Figure 20 to make the Plan sound.</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to the plan will clarify the policy. Make alterations to bullet point 1 in Policy 41. Add details on</p>

			<p>In advance of detailed technical assessment, the location and extent of ecological enhancement and the location of built development cannot be determined and specifying their location and extent restricts flexibility in taking the site forward. As such Homes England objects to the wording of Policy 41 as currently drafted and to the diagram shown in Figure 20.</p> <p>As currently drafted, the policy and diagram are too prescriptive and do not meet the test of soundness through inconsistency with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2019, Paragraph 11).</p>	<p>POLICY 41 THE GREEN, GREAT HOUGHTON (LAA1098) Housing development of [approximately] 800 dwellings, [subject to analysis of capacity], which comply with the development principles shown on Figure 20 will be supported, [following further technical assessment] and the following criteria being met:</p> <ul style="list-style-type: none"> <li>• Surveys are undertaken to identify whether the site is used by over-wintering Golden Plover / Lapwing i.e. to be carried out in the winter. If significant numbers of Golden Plover or Lapwing are identified at the site, [appropriate mitigation] will be required for the</li> </ul>	<p>buffer and need to avoid coalescence in the supporting text. No change to figure 20.</p>
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				<p>loss of habitat i.e. functionally linked land</p> <ul style="list-style-type: none"> <li>• There is an opportunity to provide woodland and semi-natural stepping stones (connected habitats) adjacent to and within the site that will provide habitat links</li> <li>• Any development on this site must adhere to Policy 30 of this Plan, in particular with reference to recreational disturbance</li> <li>• The built development should only take place outside of the [indicative] area shaded green in the diagram [subject to the confirmation of this area's suitability for ecological enhancement and to act as a buffer.]</li> </ul>	
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				<ul style="list-style-type: none"> <li>• The scheme should be of high-quality design, and must take into account and be sensitive to the significance and the setting of the Great Houghton conservation area, evident through a Heritage Impact Assessment</li> <li>• The scheme will need to take into consideration the surrounding townscape character and remain sensitive to the existing small-scale residential development within Great Houghton to the east and Hardingstone to the west. Special regard to Hardingstone Lodge will need to be incorporated in any proposal</li> <li>• A buffer is to be created, in the form of ecological</li> </ul>	
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				<p>enhancements and net increase in biodiversity within the area of search shaded green in the diagram.</p> <p>Appropriate types of habitat and accessibility are to be determined following surveys for Special Protection Area birds</p> <ul style="list-style-type: none"> <li>• The development provides suitable transport links to neighbouring developments, including neighbourhood centres and community facilities</li> <li>• The close proximity of Brackmills Country Park to the north presents an opportunity to better connect the site and the parkland, and enhance the living accommodation of those within the</li> </ul>	
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				<p>site boundary and the surrounding area. The proposal should include pedestrian and cycling provision to secure connectivity and permeability within the site and improved connections to the employment area to the north and the proposed residential areas to the west</p> <ul style="list-style-type: none"> <li>• Any proposal that comes forward should include suitable measures to mitigate the impact of additional traffic generated by the development</li> <li>• Any proposal should also include air quality and noise impact assessment from the Brackmills Industrial Estate</li> <li>• Any application on the site will need to be accompanied by an</li> </ul>	
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				archaeological investigation that considers any archaeological potential on the site	
<p><b>Representation reference:</b> 185/1/14</p> <p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> This policy has also been improved since the previous version of the Local Plan Part 2; however, it is still of concern as its potential link to the Upper Nene Valley Gravel Pits Special Protected Area (SPA) has not been established. The Habitats Regulations Assessment and Policy 41 requests that over-wintering bird surveys should be conducted to investigate the importance of the allocation to the SPA and, using the results of these surveys, to suggest suitable mitigation measures; if it is possible to do so. The area suggested for ecological enhancement within the proposal (Figure 20) seems to have been chosen for landscape rather than biodiversity reasons and is likely to be used for recreation and therefore to be highly disturbed. Policy 41 also lists a range of other issues to be considered within this allocation. We would strongly recommend that the over-wintering bird surveys are carried out as soon as possible so that the importance of the allocation (as functionally linked land) to the SPA and the mitigation/compensation which may be required are clearly established and used to reassess the suitability of the allocation.</p>	<p><b>Suggested changes:</b> None</p>	<p><b>Officer comments:</b> Surveys are expected to be undertaken by the applicant and will be advised to undertake surveys at the outset. No change.</p>
<p><b>Representation reference:</b> 197/1/19</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> 19. All Site Specific Policies within this chapter (and in particular Policy 41) will require substantial mitigation measures and supporting infrastructure to be provided, both for on-site and off-site measures.</p>	<p><b>Suggested changes:</b> Each of the Site Specific Policies should therefore be amended to include specific reference to the importance of any scheme</p>	<p><b>Officer comments:</b> All site specific policies will need to comply with other relevant generic development policies in the plan so it is not</p>

				complying with Policy 37 – Infrastructure to ensure sustainability and address any negative impacts of development of this scale.	considered necessary to list them, including Policy 37.
<p><b>Representation reference:</b> 225/1/3</p> <p><b>Name:</b> Anthony Smith</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified</p>	<p><b>Comments:</b> The comments relate to the traffic impacts of site allocation LAA1098.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The Council has undertaken a robust land availability assessment. This assessment concludes that the development can be mitigated against and Policy 41 has been formulated to guide developers accordingly.</p>
<p><b>Representation reference:</b> 225/1/4</p> <p><b>Name:</b> Anthony Smith</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p>	<p><b>Comments:</b> There has been no assessment of air quality impact within surrounding areas. Much is now known about the detrimental affects of pollution affecting the heart and lungs.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.</p>

		<ul style="list-style-type: none"> <li>- not compliant with duty to cooperate</li> </ul> <p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> </ul>			
<p><b>Representation reference:</b> 225/1/5</p> <p><b>Name:</b> Anthony Smith</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Plan is not legally compliant:</p> <ul style="list-style-type: none"> <li>- not in accordance with SCI</li> <li>- not consistent with regulatory requirements</li> <li>- not compliant with duty to cooperate</li> </ul> <p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not positively prepared</li> <li>- not justified</li> </ul>	<p><b>Comments:</b> There has been no assessment of safety linked to potential additional traffic movement through Gt Houghton.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> The Council has undertaken a robust land availability assessment, as well as undertook a traffic modelling exercises. These assessments conclude that the development can be mitigated against and Policy 41 has been formulated to guide developers accordingly.</p>
<p><b>Representation reference:</b> 246/1/13</p> <p><b>Name:</b> Natural England</p>	<p><b>Refers to:</b> Policy 41</p>	<p><b>Legal compliance and soundness:</b> Legal compliance:</p> <ul style="list-style-type: none"> <li>- not specified</li> </ul> <p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p><b>Comments:</b> The Green, Great Houghton requires a detailed project level Habitats Regulations Assessment to address impacts to the Upper Nene Valley Gravel Pits SPA. The Policy wording currently does not reference the Habitats Regulations which is an omission. Policy 30 in its current state does not refer to the HRA process.</p>	<p><b>Suggested changes:</b> The Green, Great Houghton requires a detailed project level Habitats Regulations Assessment to address impacts to the Upper Nene</p>	<p><b>Officer comments:</b> Natural England's response to the LPP2 Draft Submission Round 1 consultation dated 11.06.19 stated: Our previous advice on Water Supply &amp;</p>

				<p>Valley Gravel Pits SPA.</p>	<p>Water Quality stated that We advise that policy wording is included in the part 2 plan, whereby if RAG assessments show an issue, a project level HRA of these allocations would be required. This is not stated within the draft plan or HRA.</p> <p>The HRA accompanying the LPP2 Proposed Submission Round 2 states: The RAG (red amber green) assessments were Anglian Water's review of sites allocated in the Local Plan Part 2, to determine whether further water cycle work would be required. Paragraph 5.129 of the April 2019 HRA confirms that Anglian Water reviewed the allocated sites (as proposed in the Local Plan sites</p>
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					<p>consultation) and confirmed that no significant water treatment issues were anticipated. In response to consultation on the Proposed Submission Local Plan Part 2 (first round Regulation 19 consultation), Anglian Water raised concerns about the soundness of the Plan57, suggesting that a requirement for water efficiency standards should be incorporated into policy wording; no further concerns were raised. Policy 5 has since been updated to include a requirement for efficiency standards of 110l per person per day in new residential development. The HRA has been updated to reflect that change.</p> <p>No change</p>
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<b>Representation reference:</b> 246/1/14  <b>Name:</b> Natural England	<b>Refers to:</b> Policy 41	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective - not consistent with national policy	<b>Comments:</b> This site has been identified as functional linked land and requires winter bird surveys to determine if there will be a loss of functionally linked land (as stated within policy 41). It is stated that if found to be functionally linked land, offsite mitigation will be required. No details have been provided regarding where or how the off-site mitigation would be achieved.	<b>Suggested changes:</b> None specified.	<b>Officer comments:</b> Any applicant seeking to develop the site will need to provide details of any suitable off-site mitigation through the development management process. No modification required.
<b>Representation reference:</b> 169/1/3  <b>Name:</b> William McFarland	<b>Refers to:</b> Chapter 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified	<b>Comments:</b> We welcome your proposal for Ecological Enhancement of the area shown in Figure 20 and would emphasise its importance to prevent pressures and disturbance to the birds referred to in Policy 41.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 172/1/23  <b>Name:</b> Homes England	<b>Refers to:</b> Chapter 13	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Soundness: - not specified	<b>Comments:</b> FIGURE 20 - DEVELOPMENT PRINCIPLES FOR LAND AT THE GREEN, GREAT HOUGHTON ‘Ecological enhancement’ should be changed to read ‘ecological enhancement (indicative)’	<b>Suggested changes:</b> FIGURE 20 - DEVELOPMENT PRINCIPLES FOR LAND AT THE GREEN, GREAT HOUGHTON ‘Ecological enhancement’ should be changed to read ‘ecological enhancement (indicative)’	<b>Officer comments:</b> No modification required - There is a need to ensure that there is a buffer between the existing village and the new development area. Add to the preamble text in para 13.12.
<b>Representation reference:</b> 35/2/11	<b>Refers to:</b> Policy 42	<b>Legal compliance and soundness:</b>	<b>Comments:</b> Sound. The policy amendments following the HIA are welcomed.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.



<b>Name:</b> Historic England		Plan is legally compliant.  Plan is sound.			
<b>Representation reference:</b> 53/1/18  <b>Name:</b> Anglian Water Services Limited	<b>Refers to:</b> Policy 42	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Policy 42 Greyfriars - SUPPORT We welcome the reference made to maximising the use of Sustainable Drainage Systems on site subject to a detailed assessment being prepared. Similarly we welcome the reference made to considering the location of the existing water mains and sewers as part of the site layout to ensure access can be maintained following construction.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 75/1/13  <b>Name:</b> Town Centre Conservation Area Advisory Committee	<b>Refers to:</b> Policy 42	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not effective - not consistent with national policy	<b>Comments:</b> The Holy Sepulchre Conservation Area and Church have been badly affected by road schemes which have isolated them from the town centre. Any development plan for Greyfriars must address this.	<b>Suggested changes:</b> Add a bullet point: "Ensure that the Holy Sepulchre Conservation Area, Church and churchyard are reintegrated back into the town centre and their historic character is enhanced and protected". - In accordance with the NPPF paragraph 200, add a bullet point "Enhance the setting of the Holy Sepulchre Conservation Area,	<b>Officer comments:</b> Northampton Forward has produced a Town Centre Masterplan covering the town centre and the main gateway route into the town centre from the West. Policies 8 and 9 of the LPP2 set the context for the proposals across the town centre and the wider Central Area, including the Holy Sepulchre CA and church. No modification required.

				and the Holy Sepulchre Church. We also believe that the wider context must be taken into account when designing an appropriately integrated development. We therefore recommend that a Masterplan be developed for the wider area between the Grosvenor Centre, the Mounts, Regents Square, Broad St / Horse Market and Greyfriars.	
<p><b>Representation reference:</b> 197/1/20</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 42</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> 19. All Site Specific Policies within this chapter (and in particular Policy 41) will require substantial mitigation measures and supporting infrastructure to be provided, both for on-site and off-site measures.</p>	<p><b>Suggested changes:</b> Each of the Site Specific Policies should therefore be amended to include specific reference to the importance of any scheme complying with Policy 37 – Infrastructure to ensure sustainability and address any</p>	<p><b>Officer comments:</b> All site specific policies will need to comply with other relevant generic development policies in the plan so it is not considered necessary to list them, including Policy 37.</p>

				negative impacts of development of this scale.	
<p><b>Representation reference:</b> 248/1/19</p> <p><b>Name:</b> Welland Valley Rail</p>	<p><b>Refers to:</b> para. 13.18</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> The explanatory text at para 13.18 mentions the safeguarded former alignment, but this is not mentioned in the policy itself.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The railway line is outside of the boundary of the allocated site (LAA1139). No modification required.</p>
<p><b>Representation reference:</b> 35/1/12</p> <p><b>Name:</b> Historic England</p>	<p><b>Refers to:</b> Policy 43</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> Whilst the reduction in size of the allocation is welcomed, objections remain to the policy as proposed.</p>	<p><b>Suggested changes:</b> The words 'at least' must be deleted from the first sentence and replaced with 'up to' to ensure clarity and that heritage assets are conserved and enhanced.</p>	<p><b>Officer comments:</b> Restricting the number of dwellings on this brownfield site can have an impact on the potential of the site to deliver Northampton's local housing needs. The quantum of development proposed will still need to take into consideration all matters associated with the preservation and enhancement of heritage assets. Following updated evidence presented by Homes England a minor modification to the plan is</p>

					<p>proposed such that the words "at least 200 dwellings" will be replaced with "up to 500 dwellings".</p> <p>No modification required.</p>
<p><b>Representation reference:</b> 35/1/13</p> <p><b>Name:</b> Historic England</p>	<p><b>Refers to:</b> Policy 43</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p><b>Comments:</b> First policy criteria: .....be two to four storeys in height, with opportunities for taller buildings facing along the principal movement routes and the northern section of the site". This does not accord exactly with the wording in Policy 41 of the HIA (page 105) which states that proposals should 'Be two to four storeys in height, with taller buildings facing along the principal movement routes and the northern section of the site.' It appears that the intention of the HIA was to restrict the height of buildings on the site to 4 storeys max, with those 4-storey buildings being further away from sensitive heritage assets. The Local Plan Policy implies there are opportunities for buildings taller than 4 storeys on the site. Historic England would object due to the impact that would have on the nearby very sensitive heritage assets such as the Battlefield, Delapre Abbey, the Abbey parkland and Conservation Area.</p>	<p><b>Suggested changes:</b> As such policy criteria bullet point one should be reworded for clarity to read:- "Generally be two to A MAXIMUM OF four storeys in height, with opportunities for THE taller building facing along the principal movement routes and the northern section of the site."</p>	<p><b>Officer comments:</b> It is agreed that Policy 43 needs clarifying. It is recommended that the policy be modified to comply with the statement contained in the Heritage Impact Assessment, to read: "Be two to four storeys in height, with taller buildings facing along the principal movement routes and the northern section of the site"</p>
<p><b>Representation reference:</b> 35/1/14</p> <p><b>Name:</b> Historic England</p>	<p><b>Refers to:</b> Policy 43</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p><b>Comments:</b> The removal of the portion of the Registered Battlefield from the allocation is welcomed by Historic England. Although the remainder of the site is undesignated and has been subject to industrial uses in the 19th and 20th centuries it retains the potential to yield archaeological information relevant to the Registered Battlefield. This is recognised in the HIA, which</p>	<p><b>Suggested changes:</b> Add another policy criteria to state:- "Prior to development of the site, further archaeological</p>	<p><b>Officer comments:</b> It is agreed that this additional criteria would strengthen the policy. It is recommended that the policy be</p>

		<p>- not consistent with national policy</p>	<p>highlights the potential for battlefield archaeology to be present including encampments, along with remains of the medieval church that would have formed a component of the wider battlefield.</p> <p>We have previously advised that archaeological assessment through geophysical survey, metal detecting and excavation should be a pre-cursor to allocation, to create a sufficiently robust evidence base to ensure any proposed allocation is deliverable in accordance with national and local policies.</p> <p>As the allocation will be in advance of archaeological assessment of the site, the policy should require assessments to be carried out at an early stage to provide fuller understanding of the sensitivities of the site and inform the design process. We advocate that the allocation should have sufficient flexibility to enable areas of significant archaeological remains to be protected within areas of the development's green space'.</p>	<p>assessment will be required to inform development and layout of the site"</p>	<p>modified through an additional criteria to read: "Prior to development of the site, further archaeological assessment will be required to inform development and layout of the site"</p>
<p><b>Representation reference:</b> 53/1/19</p> <p><b>Name:</b> Anglian Water Services Limited</p>	<p><b>Refers to:</b> Policy 43</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> We welcome the reference made to maximising the use of Sustainable Drainage Systems on site subject to a detailed assessment being prepared. Similarly we welcome the reference made to considering the location of the existing water mains and sewers as part of the site layout to ensure access can be maintained following construction.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 172/1/10</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Policy 43</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> Homes England are engaged with a developer to take forward our landholding at Ransome Road and support the principle of development coming forward at this site and welcome the site's allocation in the Submission Draft Local Plan Part 2 as a Housing Allocation; Site Policy 43 Ransome Road; and on the Policies Map.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>

<p><b>Representation reference:</b> 172/1/11</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Policy 43</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> Homes England's current engagement with its development partner involves a technical assessment of the site's capacity including determination of the extent of remediation needed to address the contamination referred to in Paragraph 13.19 of the Draft Plan and maximise the site's capacity. The work undertaken so far indicates that the site has an indicative site capacity of approximately 500 homes. As currently drafted, the policy and diagram are too prescriptive and do not meet the test of soundness by failing to plan positively by artificially limiting the site's capacity and its ability to contribute to meeting the area's objectively assessed needs. The policy and diagram are inconsistent with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2019, Paragraph 11).</p>	<p><b>Suggested changes:</b> Homes England therefore requests the following changes to Policy 43 and the diagram shown in Figure 22 to make the Plan sound. POLICY 43 RANSOME ROAD (LAA1139) Ransome Road will be developed for [approximately 500] dwellings, subject to analysis of capacity in a manner which is consistent with the diagram shown in Figure 22. Proposals need to include the following:</p> <ul style="list-style-type: none"> <li>• Generally be two to four storeys in height, with opportunities for taller buildings facing along the principal movement routes and the northern section of the site</li> </ul>	<p><b>Officer comments:</b> The Council considers that the policy reference to "at least" will allow the developer to consider a higher quantum. There is no need to change the policy. No modification required.</p>
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				<ul style="list-style-type: none"> <li>• Deliver a green space with associated footpaths and cycle links to effectively link the site to Becket's Park and Delapre Park. Suitable access to Delapre Lake and Delapre Abbey and Park from Ransome Road is encouraged</li> <li>• Respect the historic integrity and significance of on-site and nearby heritage assets. Appropriately address the site's location within and adjacent to the registered battlefield of the Battle of Northampton and also make an appropriate contribution to supporting its interpretation to the local area</li> <li>• Any development should not compromise the integrity of the</li> </ul>	
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				<p>habitat to the north- east of the site</p> <ul style="list-style-type: none"><li>• Incorporate appropriate measures to mitigate against flood risk both within the area and downstream of the sites, particularly taking account of the role of Hardingstone Dyke and residual risk associated with River Nene fluvial flood defences</li></ul> <p>The layout of any development should be designed to take into account existing sewers and water mains within the site.</p> <p>Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems</p>	
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				<p>(SuDS) to reduce the rate of surface water run-off. Any proposal should also aim to contribute to improving water quality in the area. Any development will be expected to contribute to provision of woodland and wet grass stepping stones (connected habitats). Any proposal forwarded for this site should be accompanied by a site-specific Flood Risk Assessment. Any proposal should also take into account the fact that the site is included within the Upper Nene Catchment Local standards for surface water drainage of 1 in 200 year plus an allowance for climate change to</p>	
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				protect against pluvial flooding.	
<b>Representation reference:</b> 172/1/24  <b>Name:</b> Homes England	<b>Refers to:</b> Policy 43	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Soundness: - not specified	<b>Comments:</b> FIGURE 22 - DEVELOPMENT PRINCIPLES FOR RANSOME ROAD ‘Green corridor’ should be changed to read ‘Green space (indicative)’	<b>Suggested changes:</b> FIGURE 22 - DEVELOPMENT PRINCIPLES FOR RANSOME ROAD ‘Green corridor’ should be changed to read ‘Green space (indicative)’	<b>Officer comments:</b> It is agreed that a proposed modification to the plan will clarify the policy position of the figure. Modify wording on key of fig 22 from ‘Green corridor’ to ‘Green space (indicative)’
<b>Representation reference:</b> 248/1/20  <b>Name:</b> Welland Valley Rail	<b>Refers to:</b> Policy 43	<b>Legal compliance and soundness:</b> Legal compliance: - not specified  Plan is unsound: - not effective	<b>Comments:</b> Enhance policy 43 to include: “Any development should not compromise the ability to provision light or heavy rail transport links along or near to the former railway alignments to the north of the site.”	<b>Suggested changes:</b> Enhance policy 43 to include: “Any development should not compromise the ability to provision light or heavy rail transport links along or near to the former railway alignments to the north of the site.”	<b>Officer comments:</b> This is not considered necessary. The railway is outside of the area in question.
<b>Representation reference:</b> 35/1/15  <b>Name:</b> Historic England	<b>Refers to:</b> Policy 44	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> Sound. The additional policy is welcomed following the HIA.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Noted.
<b>Representation reference:</b> 53/1/20	<b>Refers to:</b> Policy 44	<b>Legal compliance and soundness:</b>	<b>Comments:</b> Policy 44 Site in Tanner Street, Green Street, St Peter's Way and Freeschool street -OBJECT (in part) - EFFECTIVE	<b>Suggested changes:</b> Add new criterion to Policy 44:	<b>Officer comments:</b> It is agreed that a proposed

<p><b>Name:</b> Anglian Water Services Limited</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>To ensure the policy is effective we would ask that reference be made to the requirement to maximise the use of SuDs on site subject to a detailed assessment which appears in the other allocation site policies in the Part 2 Local Plan.</p>	<p>'Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS).'</p>	<p>modification to Policy 44 will strengthen it. Modify the plan to add a new criterion to Policy 44: 'Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS).'</p>
<p><b>Representation reference:</b> 197/1/22</p> <p><b>Name:</b> Northamptonshire County Council</p>	<p><b>Refers to:</b> Policy 44</p>	<p><b>Legal compliance and soundness:</b> Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> 19. All Site Specific Policies within this chapter (and in particular Policy 41) will require substantial mitigation measures and supporting infrastructure to be provided, both for on-site and off-site measures.</p>	<p><b>Suggested changes:</b> Each of the Site Specific Policies should therefore be amended to include specific reference to the importance of any scheme complying with Policy 37 – Infrastructure to ensure sustainability and address any negative impacts of development of this scale.</p>	<p><b>Officer comments:</b> All site specific policies will need to comply with other relevant generic development policies in the plan so it is not considered necessary to list them, including Policy 37.</p>
<p><b>Representation reference:</b> 172/1/7</p>	<p><b>Refers to:</b> Chapter 14</p>	<p><b>Legal compliance and soundness:</b></p>	<p><b>Comments:</b></p>	<p><b>Suggested changes:</b></p>	<p><b>Officer comments:</b></p>

<p><b>Name:</b> Homes England</p>		<p>Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>As currently drafted the policy and supporting table refer to proposal offsetting loss of biodiversity. 'Offsetting' implies an offsite solution, yet it is often possible to deliver net gain on the same site.</p> <p>As such, the policy and supporting table in the plan do not meet the test of soundness through inconsistency with national policy which requires plans planning policies and decisions to contribute to and enhance the natural and local environment including by minimising impacts on and providing net gains for biodiversity (NPPF, 2019 Paragraph 170d).</p>	<p>The policy and table should be reworded as follows: POLICY 29 SUPPORTING AND ENHANCING BIODIVERSITY 1. The Council will require all major development proposals [to secure a net gain] in biodiversity through the strengthening, management and / or creation of new habitats. This should be measured through the use of a recognised biodiversity calculator. Proposals will be expected to incorporate measures to enhance biodiversity within or around a development site, and to contribute to the consolidation and</p>	<p>It is agreed that a proposed modification to the plan will clarify the policy. Modify Policy 29 to remove 'offset the loss and': The Council will require all major development proposals to secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats. This should be measured through the use of a recognised biodiversity calculator. Proposals will be expected to incorporate measures to enhance biodiversity within or around a development site, and to contribute to the consolidation and development of local ecological networks, including beyond the borough's</p>
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				<p>development of local ecological networks, including beyond the borough's boundary. Development should avoid the fragmentation of habitats and links and address the Northamptonshire Biodiversity Action Plan local priorities for habitats and species.</p> <p>Table 12: Indicator: Biodiversity net gain Target: [Major developments must secure a net gain in biodiversity] Main Policy delivered: 29</p>	<p>boundary. Development should avoid the fragmentation of habitats and links and address the Northamptonshire Biodiversity Action Plan local priorities for habitats and species.</p> <p>Amend Table 12 to include wording in brackets: Indicator: Biodiversity net gain Target: Major developments must secure a net gain in biodiversity Main Policy delivered: 29</p>
<p><b>Representation reference:</b> 185/1/15</p> <p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>	<p><b>Refers to:</b> Chapter 14</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> We are pleased to see that Biodiversity Net Gain is included as one of the monitoring indicators within the Green Infrastructure objective. The indicator suggests that only major developments are included in this monitoring. The National Planning Policy Framework paragraphs 170 and 174 already require all development to show how they can provide a net gain in biodiversity. This will also be included in the Environment Bill when it proceeds through Parliament.</p>	<p><b>Suggested changes:</b> We would, therefore, suggest that the indicator looks at a range of developments to see how they are performing against this objective. It</p>	<p><b>Officer comments:</b> Policy 29 requires all major development to secure a net gain in biodiversity therefore the monitoring indicator reflects that</p>

				would also be useful to monitor both the plans made at the application stage and their success within the developments post construction.	requirement. No change.
<p><b>Representation reference:</b> 185/1/16</p> <p><b>Name:</b> Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</p>	<p><b>Refers to:</b> Objective 10</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> We are pleased to see that Biodiversity Net Gain is included as one of the monitoring indicators within the Green Infrastructure objective. The indicator suggests that only major developments are included in this monitoring. The National Planning Policy Framework paragraphs 170 and 174 already require all development to show how they can provide a net gain in biodiversity. This will also be included in the Environment Bill when it proceeds through Parliament.</p>	<p><b>Suggested changes:</b> We would, therefore, suggest that the indicator looks at a range of developments to see how they are performing against this objective. It would also be useful to monitor both the plans made at the application stage and their success within the developments post construction.</p>	<p><b>Officer comments:</b> Policy 29 requires all major development to secure a net gain in biodiversity therefore the monitoring indicator reflects that requirement. No change.</p>
<p><b>Representation reference:</b> 172/1/25</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Glossary</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> The test of soundness requires plans to be consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF. Paragraph 129 of the NPPF makes reference to Building for Life. This design tool has now been updated to Building for a Healthy Life.</p>	<p><b>Suggested changes:</b> Include in the Glossary: Building for a Healthy Life (BHL) Building for a Healthy Life is a Design Code to help people improve the</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to the plan will clarify the policy. Modify the plan to include the following in the Glossary:</p>

			<p><a href="https://www.udg.org.uk/publications/othermanuals/building-healthy-life">https://www.udg.org.uk/publications/othermanuals/building-healthy-life</a></p> <p>The design tool is now in use by Homes England as referenced in our comments on Policy 3 Design and the updated design tool should be referenced in the Glossary.</p>	<p>design of new and growing neighbourhoods. BHL updates England's most widely known and most widely used design tool for creating places that are better for people and nature. The original 12 point structure and underlying principles within Building for Life 12 are at the heart of BHL.</p> <p>The new name reflects changes in legislation as well as refinements made to the 12 considerations in response to good practice and user feedback. It also recognises that this latest edition has been written in partnership with Homes England, NHS England and NHS Improvement. BHL integrates the</p>	<p>Building for a Healthy Life (BHL) Building for a Healthy Life is a Design Code to help people improve the design of new and growing neighbourhoods. BHL updates England's most widely known and most widely used design tool for creating places that are better for people and nature. The original 12 point structure and underlying principles within Building for Life 12 are at the heart of BHL.</p> <p>The new name reflects changes in legislation as well as refinements made to the 12 considerations in response to good practice and user feedback. It also recognises that this latest edition has</p>
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				findings of the three-year Healthy New Towns Programme led by NHS England and NHS Improvement.	been written in partnership with Homes England, NHS England and NHS Improvement. BHL integrates the findings of the three-year Healthy New Towns Programme led by NHS England and NHS Improvement.
<p><b>Representation reference:</b> 105/1/8</p> <p><b>Name:</b> Great Houghton Parish Council</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> On a practical level it is argued that The Green, with the timescales involved, and the need for infrastructure resources will not be in a position to enhance delivery. Indeed, it will increase the target and fail to deliver. Appendix A, page 179 of Local Plan Part 2 assumes The Green will deliver 800 news units 2018/19 to 2028/29. This is not achievable. We are already in the second of those years (by which time, the Council assumes 50 units completed) and there is no prospect of a start on site in the medium term. Allocating land at The Green will not solve the under-delivery against target in Northampton. Indeed, it will make things worse by adding additional competition to the existing pool of large sites for infrastructure and other resources. The Council should address the under-delivery issue by concentrating resources on delivering the existing SUEs and facilitating the development of smaller sites. Not justified As set out above the Parish Council do not consider Local Plan Part 2 is putting forward “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (NPPF, paragraph 35). The continued over-reliance on a further larger site (The Green) and the existence, within Local Plan Part 2 itself, of</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The West Northamptonshire Joint Planning Unit produces a Joint Monitoring Report which considers the rate of house building in Northampton. The NPPF (para 75) states that authorities should prepare an action plan in line with national planning guidance, to assess the causes of underdelivery and identify actions to increase delivery in future years. It has been identified that large,</p>



			<p>sufficient smaller sites to increase supply, if not delivery, is a reasonable alternative.</p> <p>In addition, development of The Green is not justified for the following detailed reasons.</p>		<p>allocated sites are taking longer to build out and as such the LPP2 allocates smaller sites to rectify the historic underdelivery of homes.</p> <p>Policy 37 of the LPP2 requires development proposals to contribute towards new infrastructure associated with and resulting from the scheme.</p> <p>No modification required.</p>
<p><b>Representation reference:</b> 172/1/26</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> Homes England welcomes the inclusion of the following sites in Appendix A Trajectory for sites allocated in the Local Plan Part 2.</p> <p>Ref 0174 Ransome Road Gateway Ref; 1097 Gate Lodge; Ref 1098 The Green, Great Houghton Ref 1099 Upton Reserve Site; Ref 1139 Merge Homes England plots in Ransome Road.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 172/1/27</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> As currently drafted, for a number of these sites, Appendix A is too prescriptive, and does not meet the test of soundness through inconsistency with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2019, Paragraph 11).</p>	<p><b>Suggested changes:</b> For the site at Ransome Road; Ref 1139 modifications should be in line with the comments we have made on Policies 13 and 43</p>	<p><b>Officer comments:</b> Policy 43 reference to "at least" 200 dwellings mean that a higher capacity can be considered. There is no need to change the</p>

				with regard to the Indicative Dwelling Capacity of this site.	indicative dwelling capacity for the site.
<p><b>Representation reference:</b> 172/1/28</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> The trajectory for the site at The Green, Great Houghton Ref 1098 should be modified in line with the comments made on Policy 41 with regard to the first year of completions; recognising that further technical work and capacity work is to be completed; this is expected towards the beginning of the second five years of the plan, with an expected delivery rate of 50 dwellings completed per annum for the first two years then up to 100 dwellings completed per annum with two sales outlets.</p>	<p><b>Suggested changes:</b> The trajectory for the site at The Green, Great Houghton Ref 1098 should be modified in line with the comments made on Policy 41 with regard to the first year of completions; recognising that further technical work and capacity work is to be completed; this is expected towards the beginning of the second five years of the plan, with an expected delivery rate of 50 dwellings completed per annum for the first two years then up to 100 dwellings completed per annum with two sales outlets.</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to the plan to include an updated trajectory.</p> <p>Modify trajectory for site LAA1098 The Green, Great Houghton recognising that further technical work and capacity work is to be completed; this is expected towards the beginning of the second five years of the plan, with an expected delivery rate of 50 dwellings completed per annum for the first two years then up to 100 dwellings completed per annum with two sales outlets.</p>

<p><b>Representation reference:</b> 172/1/29</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> The trajectories for the sites at Gate Lodge Ref 1097 and Upton Reserve Site Ref 1099 should be modified with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first completions on both sites should be moved to 2022/23.</p>	<p><b>Suggested changes:</b> The trajectories for the sites at Gate Lodge Ref 1097 and Upton Reserve Site Ref 1099 should be modified with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first completions on both sites should be moved to 2022/23.</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to the plan will update the trajectory. Modify trajectory for site LAA1097 with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first completions on both sites should be moved to 2022/23.</p>
<p><b>Representation reference:</b> 172/1/30</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> The trajectories for the sites at Gate Lodge Ref 1097 and Upton Reserve Site Ref 1099 should be modified with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first completions on both sites should be moved to 2022/23.</p>	<p><b>Suggested changes:</b> The trajectories for the sites at Gate Lodge Ref 1097 and Upton Reserve Site Ref 1099 should be modified with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first</p>	<p><b>Officer comments:</b> It is agreed that a proposed modification to the plan will update the trajectory. Modify trajectory for site LAA1099 with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first</p>

				completions on both sites should be moved to 2022/23.	completions on both sites should be moved to 2022/23.
<p><b>Representation reference:</b> 232/1/13</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> The current housing trajectory for site 0168 at Appendix A to the Plan, which assumes housing completions taking place from 2019-20, is not deliverable. Not only does this site not benefit from a planning permission for its development (in common with sites 1009 and 1142), but it also relies upon the delivery of the NSSUE for its access and utility servicing (again, as for sites 1009 and 1142).</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The respondent commented that this site should be combined with sites 1009 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>
<p><b>Representation reference:</b> 232/1/14</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council's proposed addition of 361 dwellings can be delivered during the second five years of the Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this large development that offers scope for several concurrent sales outlets alongside affordable housing provision.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The respondent commented that this site should be combined with sites 1009 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended</p>

					combined sites and updated trajectory.
<p><b>Representation reference:</b> 232/1/15</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council’s proposed addition of 361 dwellings can be delivered during the second five years of the Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this large development that offers scope for several concurrent sales outlets alongside affordable housing provision.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The respondent commented that this site should be combined with sites 0168 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>
<p><b>Representation reference:</b> 232/1/16</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council’s proposed addition of 361 dwellings can be delivered during the second five years of the Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this large development that offers scope for several concurrent sales outlets alongside affordable housing provision.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The respondent commented that this site should be combined with sites 0168 and 1009, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>

<p><b>Representation reference:</b> 232/1/20</p> <p><b>Name:</b> Vistry Latimer Collingtree LLP</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p><b>Suggested changes:</b> Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p><b>Officer comments:</b> The respondent commented that these sites should be combined and a revised trajectory provided. This recommendation is considered acceptable. Modify Policies 13 and 38 and the Policies Map to reflect the recommended combined sites.</p>
<p><b>Representation reference:</b> 233/1/13</p> <p><b>Name:</b> Lagan Homes</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> The current housing trajectory for site 0168 at Appendix A to the Plan, which assumes housing completions taking place from 2019-20, is not deliverable. Not only does this site not benefit from a planning permission for its development (in common with sites 1009 and 1142), but it also relies upon the delivery of the NSSUE for its access and utility servicing (again, as for sites 1009 and 1142).</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The respondent commented that this site should be combined with sites 1009 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>
<p><b>Representation reference:</b> 233/1/14</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p>	<p><b>Comments:</b> An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council’s proposed addition of 361 dwellings can be delivered during the second five years of the</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The respondent commented that this site should be</p>

<p><b>Name:</b> Lagan Homes</p>		<p>Plan is unsound: - not justified - not effective</p>	<p>Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this large development that offers scope for several concurrent sales outlets alongside affordable housing provision.</p>		<p>combined with sites 1009 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>
<p><b>Representation reference:</b> 233/1/15</p> <p><b>Name:</b> Lagan Homes</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p><b>Comments:</b> An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council’s proposed addition of 361 dwellings can be delivered during the second five years of the Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this large development that offers scope for several concurrent sales outlets alongside affordable housing provision.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The respondent commented that this site should be combined with sites 0168 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>
<p><b>Representation reference:</b> 233/1/16</p> <p><b>Name:</b> Lagan Homes</p>	<p><b>Refers to:</b> Appendix A</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p><b>Comments:</b> An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council’s proposed addition of 361 dwellings can be delivered during the second five years of the Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The respondent commented that this site should be combined with sites 0168 and 1009, and</p>

		- not justified - not effective	large development that offers scope for several concurrent sales outlets alongside affordable housing provision.		a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.
<b>Representation reference:</b> 233/1/20  <b>Name:</b> Lagan Homes	<b>Refers to:</b> Appendix A	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	<b>Suggested changes:</b> Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	<b>Officer comments:</b> This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the combined sites 0168, 1009 and 1142.
<b>Representation reference:</b> 247/1/11  <b>Name:</b> Bellway Homes	<b>Refers to:</b> Appendix A	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is sound.	<b>Comments:</b> It is clear that the site will make a meaningful contribution to the Council’s five-year housing land supply. Bellway Homes broadly supports the Council’s proposed housing trajectory; a delivery rate of 25 dwellings per annum is considered to be conservative but a sensible point to work forwards from.	<b>Suggested changes:</b> Noted.	<b>Officer comments:</b> Welcomed.
<b>Representation reference:</b> 23/1/6  <b>Name:</b>	<b>Refers to:</b> Appendix C	<b>Legal compliance and soundness:</b> Plan is legally compliant.	<b>Comments:</b> Within Appendix C (Infrastructure Requirements) of the submission Local Plan, the following statement is made:	<b>Suggested changes:</b> The above reference to highways contributions from	<b>Officer comments:</b> There is a live application on this site.



University of Northampton		<p>Plan is unsound:</p> <ul style="list-style-type: none"> <li>- not justified</li> <li>- not effective</li> <li>- not consistent with national policy</li> </ul>	<p>'Overall the results to not indicate any of the proposed Local Plan Part 2 sites would have a severe impact on the network which would mean they would be unacceptable in transport terms in accordance with the National Planning Policy Framework. However, the Plan pursue policies which reduce the amount of travel by car.</p> <p>Transport Assessments or Transport Statements will be required for development proposals, dependent on their size. These may indicate the need for localised improvement works, particularly around access to the site.</p> <p>The modelling has, however, identified the following highway infrastructure improvements needed to accommodate the cumulative scale of growth proposed. Developer contributions will be sought towards their implementation.</p> <ol style="list-style-type: none"> <li>1. Rowtree Road approach to the A45 Wootton Fields interchange – Junction improvements required to support Northampton South SUE.</li> <li>2. Bedford Road, Newport Pagnell Road, The Green To accommodate development at The Green, Great Houghton (site LAA1098) the following is required: <ul style="list-style-type: none"> <li>• Significant upgrading of The Green</li> <li>• Significant upgrading of the eastern Bedford Road approach to the Barnes Meadow roundabout to include widening of the river bridge. Highways England should be consulted on any works impacting the A45.</li> </ul> </li> <li>3. London Road / Cotton End Junction – Development off Ransome Road (sites LAA0174 and LAA1139) will be expected to provide improvements to this junction.</li> </ol>	<p>Avenue Campus should therefore be removed from the Plan.</p> <p>The proposed amendment is required in order to ensure that the plan is justified and effective in line with the NPPF and guidance in the PPG.</p>	
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<p><b>Representation reference:</b> 172/1/31</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Appendix C</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> As stated in our comments on Policy 41, Homes England are undertaking technical studies of their landholding at The Green, Great Houghton to support the submission of an outline planning application for residential development.</p> <p>Homes England note the reference in Appendix C Northampton Infrastructure Requirements and that traffic modelling and analysis by the County Council in 2020 has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth proposed and that developer contributions will be sought towards their implementation.</p>	<p><b>Suggested changes:</b> None.</p>	<p><b>Officer comments:</b> Noted.</p>
<p><b>Representation reference:</b> 172/1/32</p> <p><b>Name:</b> Homes England</p>	<p><b>Refers to:</b> Appendix C</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p><b>Comments:</b> Homes England also note that to accommodate development at The Green, Great Houghton, highway infrastructure improvements will be needed to Bedford Road and Newport Pagnell Road.</p> <p>In advance of detailed technical work and capacity analysis, and before Transport Assessments and Statements are prepared, Homes England's position is that the requirements as set out in Appendix C are over prescriptive; and do not meet the test of soundness by failing to plan positively by potentially artificially limiting the site's capacity and their ability to contribute to meeting the area's objectively assessed needs. Appendix C policy is inconsistent with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2019, Paragraph 11).</p>	<p><b>Suggested changes:</b> In order to achieve a more flexible approach, the wording in Annex C should be revised to read as follows: To accommodate development at The Green, Great Houghton (site LAA1098) the following is required: * [Upgrading] of The Green * [Upgrading] of the eastern Bedford Road approach to the Barnes Meadow roundabout, [potentially</p>	<p><b>Officer comments:</b> No modification recommended - these are recommendations from Northamptonshire County Council.</p>

				including widening] of the river bridge. Highways England should be consulted on any works impacting the A45.	
<b>Representation reference:</b> 230/1/8  <b>Name:</b> Moulton Parish Council	<b>Refers to:</b> Appendix C	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not effective	<b>Comments:</b> No mention of Northern Orbital Route. This should be cross-referenced to 11.5.	<b>Suggested changes:</b> None.	<b>Officer comments:</b> The Northern Orbital Route is not referenced in Appendix C as there is no approved scheme yet.
<b>Representation reference:</b> 113/1/23  <b>Name:</b> East Hunsbury Parish Council	<b>Refers to:</b> Appendix G	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not justified - not effective	<b>Comments:</b> It is noted that there is provision at Appendix G for two primary schools local to East Hunsbury. E5 of which we are aware and forms part of the Northampton South SUE development. Ref E41 refers to a 3-form primary school at Collingtree, of which we have no knowledge. Northampton Borough Council have confirmed that this school was an additional school, approved as a result of an application made by an academy trust directly to the ESFA in 2017/18, and submitted on the basis of anticipated wider growth requirements of the area. The County Council has received confirmation that the scheme has been withdrawn from ESFA's programme. Therefore we would expect to see this school removed from the Appendix.	<b>Suggested changes:</b> Noted.	<b>Officer comments:</b> Agreed. Modify and update Appendix G to remove E41 scheme.
<b>Representation reference:</b> 197/1/23  <b>Name:</b>	<b>Refers to:</b> Appendix G	<b>Legal compliance and soundness:</b> Legal compliance: - not specified	<b>Comments:</b> Appendix G – Primary Education 20. The County Council has reviewed the list of Primary Education projects included at Appendix G. It should be noted that project ref E41 – ‘New three-form entry Primary School in	<b>Suggested changes:</b> Appendix G – Primary Education 20. The County Council has	<b>Officer comments:</b> Modify Appendix G to take into account the updated position.

Northamptonshire County Council		Soundness: - not specified	Collingtree (Wave 11 Free School: Approved)' is not currently expected to come forward at this time, having been withdrawn from the ESFA's free school delivery programme. It is recommended that this project be deleted from this schedule.	reviewed the list of Primary Education projects included at Appendix G. It should be noted that project ref E41 – 'New three-form entry Primary School in Collingtree (Wave 11 Free School: Approved)' is not currently expected to come forward at this time, having been withdrawn from the ESFA's free school delivery programme. It is recommended that this project be deleted from this schedule.	
<b>Representation reference:</b> 230/1/10  <b>Name:</b> Moulton Parish Council	<b>Refers to:</b> Appendix G	<b>Legal compliance and soundness:</b> Plan is legally compliant.  Plan is unsound: - not positively prepared - not effective	<b>Comments:</b> E10 mentions "another local school". What are the possible options? The nearest is presumably Moulton Primary, which is arguably not viable bearing in mind the already poor vehicle access?	<b>Suggested changes:</b> None.	<b>Officer comments:</b> Appendix G, Ref E10 references 'half a form entry to another local school'. The local school has not yet been determined (take from IDP 2019).
<b>Representation reference:</b> 230/1/11	<b>Refers to:</b> Appendix H	<b>Legal compliance and soundness:</b>	<b>Comments:</b> E39 – mention of proposed school is vague, bearing in mind that proposals have already been made for NSB-supported	<b>Suggested changes:</b> None.	<b>Officer comments:</b> It is expected that the Northampton

<p><b>Name:</b> Moulton Parish Council</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not effective</p>	<p>school on land adjacent to old A43 south of Moulton. Are these proposals one and the same? Why is the specific “NSB school” and location not mentioned?</p>		<p>School for Boys scheme could fulfill the requirement in this area. However, it does not have planning permission yet. As such other provision may be needed in this area.</p>
<p><b>Representation reference:</b> 201/1/18</p> <p><b>Name:</b> Persimmon Homes</p>	<p><b>Refers to:</b> The Plan and policies map</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p><b>Comments:</b> We would also note that part of the Dallington Grange SUE is shown on the proposals map as a Local Wildlife Site (LWS) where draft Policy 29 will apply. As the Council will be aware, a suite of detailed botanical surveys and assessment work was undertaken at the Dallington Heath LWS to inform the outline planning application. These works were to ascertain its “true” ecological value and to inform the ecological mitigation and enhancement strategy that will be controlled by planning condition on the outline planning permission. As such, the loss of the element of the LWS that incurs into the site and the mitigation for that loss has already been agreed by the Council in principle as reflected by the resolution to grant planning permission. This is not reflected on the proposals map and we feel that this this will be misleading for decision-makers and stakeholders particularly in light of the wording of draft Policy 29.</p>	<p><b>Suggested changes:</b> Alterations to Policies Map to reflect changes to the LWS as part of the Dallington Grange SUE development.</p>	<p><b>Officer comments:</b> It is recommended that the Policies Map be modified to reflect changes to the LWS as part of the Dallington Grange SUE development.</p>
<p><b>Representation reference:</b> 224/1/3</p> <p><b>Name:</b> Friends of West Hunsbury Parks</p>	<p><b>Refers to:</b> The Plan and policies map</p>	<p><b>Legal compliance and soundness:</b> Plan is legally compliant.</p> <p>Plan is sound.</p>	<p><b>Comments:</b> The area of land between LAA1112 and LAA1025 has no category allocated to it. This area is part of Ladybridge Park which is an amenity green space. It has at least 4 football pitches on it and Welland Valley Football Club are licensed by NBC to use the pitches. It is part of an amenity green space which is in constant use. The Park is a gated Park with no access to both Car Parks from 8am to 5:30 in the winter and 8am to 8:30pm in the summer.</p>	<p><b>Suggested changes:</b> None specified.</p>	<p><b>Officer comments:</b> The council will amend the Plan accordingly.</p>

			This includes the Car Park by the football pitches,the area of land in question.		
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