

This form has two parts:

Part A – contact details

Part B – your representation

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

Ref:

(for official use
only)

Part A

1. Personal Details*		2. Agent's Details (if applicable)
<i>* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in column 2.</i>		
Title	Mr	
First name	Giles	
Last name	Krepfels	
Job title (where relevant)		
Organisation (where relevant)		
Address line 1		
Line 2	Broughton	
Line 3		
City/Town	Northants	
County		
Postcode		
Telephone number		
Email (if provided we will always contact you this way)	Richmondprops1@gmail.com	

Part B: Please use a separate sheet for each representation

Please note all comments will be made publically available. If you do not have sufficient space in the box please continue on a separate sheet or expand the box.

3. To which part of the Local Plan does this representation relate?	Paragraph number	Policy number	Policies Maps
ENV3	9.2	9.2.01	Map 7 Northampton fringe inset map

4. Do you consider the Local Plan is: (please tick in the box below as appropriate and then provide details in the space below)				
4. (1) Legally compliant?			No	
4. (2) Compliant with the Duty to co-operate?			No	
4. (3) Sound?			No	

4 (1) Please give details of why you consider the Local Plan is not legally compliant, be as precise as possible. Settlements & Countryside Local Plan 2 for Daventry District is not legally compliant because it is not in accordance with the Part 1 Plan. The Part 1 Plan was inspected by Local Plan inspector Nigel Payne in 2013/14 he also reviewed the neighbouring Cherwell District Plan. As a result of his review DDC's Green Buffer in it's Part 1 Plan June 2014 was removed, as there was sufficient policies in the plan that provided a robust rural areas policy framework and a Green Buffer would introduce unnecessary constraint. By calling it a Green Wedge as unnecessary duplication.

This allocation fails to perform the function of Green Wedge, it certainly constrains residential and commercial development it offers no channel for acceptable sustainable development in the future.

i)The allocation would prevent any future extension to Moulton Park which would otherwise come forward as a means to make efficient use of the services and infrastructure already present in the are and this would be contrary to objective 12.

There is no basis to state that the Green Wedge allocation leads to design, perhaps the opposite and accordingly the designation does not assist with the delivery of objective 13. Green Wedge designation would be harmful to the setting and the viability of Heritage Assets as set out in objective 14, indeed it would cut them off from the greater community. Therefore does not co-operate with any of the organisations that encourage the protection and accessibility of such sites.

ii)It is also apparent that the Green Wedge allocations particularly around Moulton Park particularly between Moulton and Boughton are not prepared in any way or basis of robust considered technical appraisal, bearing in mind the Highways wishes of a new road system to help with the development of this area particularly for Moulton Park.

4 (2) Please give details of why you consider the Local Plan does not comply with the duty to co-operate, be as precise as possible. Settlements & Countryside Local Plan Part 2 for Daventry District does not comply with the duty to co-operate because

- a) By applying a blanket Green Wedge it stops any flexibility to assist neighbouring authorities to deliver their statutory housing development obligations. As a result of natural environmental restrictions such as flood plains, motorways and existing road capacity by introducing a blanket Green Wedge this removes the ability to assist Northampton Borough Council meet it's housing development obligation and force any future development further into virgin countryside.
- b) A blanket Green Wedge from Lower Harlestone, through Upper Harlestone, Church Brampton, Chapel Brampton, Boughton, Moulton, to Overstone mirrors the route of the North West Orbital Route that is currently being consulted on by the Highways Dept. By introducing a Green Wedge and thereby restricting future flexibility on this area clearly shows no co-operation with other Public Agencies.

(continue on a separate sheet/expand box if necessary)

4 (3) Please give details of why you consider the Local Plan is not sound, referring to the tests of soundness as appropriate, be as precise as possible. Settlements & Countryside Local Plan Part 2 for Daventry District Council does not comply with the test of soundness recognised as: POSITIVELY PREPARED Local Plan Part 2 does not take into consideration neighbouring authorities' shortfall in delivering their housing development. Northampton BC currently has a forecasted housing shortfall over the next 5 years. By introducing a Green Wedge from Lower Harlestone, through Upper Harlestone, Church Brampton, Chapel Brampton, Boughton, Moulton, to Overstone this stops any flexibility to develop. An area which includes land owned by Northampton BC it is therefore unsound to introduce a Green Wedge here. Highways have recognised the need to improve the infrastructure in this area and proposed the North West Orbital Route by introducing a Green Wedge here it restricts flexibility and will limit the ability of developers to be able to contribute to this much needed infrastructure improvement. It is therefore considered that they are not prepared on the proposed Green Wedge on any robust technical appraisal.

JUSTIFIED to introduce a blanket Green Wedge from Lower Harlestone, through Upper Harlestone, Church Brampton, Chapel Brampton, Boughton, Moulton, to Overstone is not justified as within this area there are bespoke pockets of development opportunities that offer better strategic development for Northampton. The proposed introduction of a blanket Green Wedge focuses purely on stopping any urban coalescence with Northampton and is unsound and is completely at the detriment to the economy and well being of Northampton and it's residents and forces any possible development to areas around Northampton that are under severe pressure from and cannot take any further expansion. The area that this Green Wedge covers particularly around Moulton Park and Kingsthorpe is the natural expansion area of this established market town.

EFFECTIVE it is unsound to introduce a blanket Green Wedge on an area that extends from Lower Harlestone, through Upper Harlestone, Church Brampton, Chapel Brampton, Boughton, Moulton, to Overstone and expect there to be no urban development in this area until after 2029. In my opinion it's affective at nothing more than moving at the planned development of Northampton to someone else's doorstep where any development would have no supporting infrastructure and indeed no need, so therefore it has only detrimental affect.

CONSISTENT WITH NATIONAL POLICY currently many parts of this area are unsustainable for an agricultural economy, with increasingly large agricultural machinery being used there is a conflict with getting this equipment to where it is required and the current levels of road congestion. Many areas within the proposed Green Wedge abut growing population density and experience increased rural vandalism of fences letting livestock onto roads as a result it is unsound to introduce a blanket Green Wedge and expect there to be no development in this area until after 2029

In my opinion it does not assist with the delivery of objective 13, the Green Wedge allocation prevents future sustainable extension of Moulton Park and surrounds which would otherwise naturally come forward to make use of the efficient tried and tested services and infrastructure already present and this would be contrary to objective 12.

This Green Wedge would not deliver improved design and does not assist objective 13 and could potentially be harmful to the support and setting of Heritage Assets set out in objective 14.

(continue on a separate sheet/expand box if necessary)

5. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at part 4(1) or 4(3) above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I propose the Green Wedge from Lower Harlestone, through Upper Harlestone, Church Brampton, Chapel Brampton, Boughton, Moulton, to Overstone is removed

(Continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matter and issues he/she identifies for examination.

6. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please tick as appropriate)

No, I do not wish to participate at the oral examination	NO	Yes, I wish to participate at the oral examination	
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7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

8. Please tick the box if you wish to be notified of further progress of the Local Plan.	TICKED
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9. Signature	GILES KREMPELS	Date	5th October 2018
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Thank you for taking the time to complete the form.
Please return it to the Local Strategy Service at Daventry District Council
by 4.30pm on Friday 5th October 2018.
Responses received after this time will not be accepted.