

Analysis of Representations made on the Semilong and Trinity Neighbourhood Area and Forum Applications

Introduction

Northampton Borough Council formally received applications requesting the designation of the Semilong and Trinity Neighbourhood Area and Forum. In accordance with the Neighbourhood Planning (General) 2012 Regulations (6 and 9) Northampton Borough Council publicised both applications and invited representations from Tuesday 13th June to 5.00pm on Tuesday 25th July 2017.

Overview of Findings

47 representations were received. Of these 37 openly objected to the Racecourse being included in the proposed Neighbourhood Area and two supported the inclusion of the Racecourse. Whilst the remaining eight representations did not specifically state that the Racecourse should not be included within the proposed Neighbourhood Area they did express concern for its inclusion rather than support.

Nine representations were received in relation to the proposed Neighbourhood Forum / Constitution. Four of these openly supported the proposal for a Neighbourhood Plan, one wished the Forum luck and the remaining four made representations relating to the proposed structure of the Forum and / or content of the proposed Constitution. One representation suggested that the name of the proposed Neighbourhood Forum / Plan be changed to become the Semilong, Trinity and Racecourse Neighbourhood Forum / Plan.

Analysis in Detail

Neighbourhood Area: The Racecourse

37 respondents objected to the Racecourse being included in the Neighbourhood Area (NA). However, the analysis of these responses indicates a lack of understanding about the process of developing a Neighbourhood Plan and the benefit that would be brought to the Racecourse if it were included in the Neighbourhood Area (NA).

These are four main reasons cited for objecting to the Racecourse being in the NA:

1. The Racecourse belongs to everyone and should not be confined to the proposed NA boundary (26 responses)
2. Excluding people outside of the NA from having a say on issues affecting the Racecourse is undemocratic / unfair (14 responses)
3. Residents with properties backing onto the Racecourse have specific concerns about proposals which affect them specifically. They should be included / not excluded from any decision making (11 responses)
4. Everyone should be able to have a say on issues affecting the Racecourse not just the people who live and carry on business within the proposed NA (8 responses)

The majority of the respondents appeared to believe that if the Racecourse is included in the NA only the residents living in the NA get to propose ideas and make decisions about it. This isn't how Neighbourhood Planning works. A good Neighbourhood Plan is founded on a robust programme of community engagement and a strong, proportionate evidence base. This approach makes sure that the Plan is based on a proper understanding of the area and of the views, aspirations, wants and needs of local people.

A Neighbourhood Plan is a community led framework for guiding the future development, regeneration and conservation of an area. Nobody is excluded from the community engagement process. Indeed engaging with the wider community right from the beginning of the plan making process will make sure it genuinely represents the range of wants and needs in the local area.

Neighbourhood Area – An Area of Benefit

Interestingly the majority of representations wanted to see the Racecourse removed from the NA. Only four respondents openly expressed the suggestion to extend the boundary to include residents who abut the park in some-way. The preference to exclude the Racecourse from the NA indicates a lack of understanding about the advantages for including the Racecourse in the NA.

A NA is sometimes referred to as an Area of Benefit in reflection of the opportunities a Neighbourhood Plan can bring about. The Plan can develop policy that supports appropriate development opportunities (sport, leisure and recreational). Community proposals about the regeneration and enhancement of the Racecourse, for example enhancing pedestrian links; improving entrances and exits; creating key features can be contained in planning guidance developed to support Plan policy. This would mean community aspirations are delivered in line with community vision.

If the Community Infrastructure Levy continues the Neighbourhood Plan can secure 25% of the funding arising through receipts from development in the Plan area. Some of this could be allocated to delivering Racecourse enhancements. In addition, NAs often attract funding streams from alternative sources in support of development, regeneration and enhancement.

Neighbourhood Area – Other Concerns

One respondent was concerned that the inclusion of the Racecourse could introduce conflicts with existing Northampton Borough Council management arrangements and policies. This would not be the case. Management arrangements are not a planning matter and therefore would not form part of the Neighbourhood Plan. To meet the basic conditions a Neighbourhood Plan must have appropriate regard to national policy and be in general conformity with the strategic policies in the Local Plan for the area. This removes the risk of conflicting and / or duplicated policy.

There was unease that the proposed NA reflected political boundaries rather than communities with a common interest. Para 033 (Ref ID: 41-033-20140306) of the Planning Practice Guidance does advocate that electoral ward boundaries can be a useful starting point for discussions and they are therefore reasonable, feasible and in line with the regulations.

In relation to expanding the Neighbourhood Area for the inclusion of communities with a common interest. Regular practice when defining a NA has been to draw a boundary around the area where change can be implemented locally. This way the Plan has a defined area of benefit to work on keeping it focused and relevant. However, the approach is not a requirement and if there is an appetite to expand the boundary to include residents with properties abutting the Racecourse the NA could be amended. This would require the Qualifying Body to submit a new application for the revised neighbourhood Area to be designated.

Five respondents queried the implications the NA might have in relation to the heritage of the area and the Conservation Area. As noted above the NP must have due regard to national and locally strategic policies and will therefore not conflict with the heritage aspirations of the area if it is to meet the basic conditions.

Furthermore, the Constitution submitted with the Neighbourhood Area and Forum applications sets out a specific objective under 3.3 to 'promote and preserve the historic / heritage features of the Semilong / Trinity Neighbourhood Area' demonstrating a commitment from the Forum to ensure the integrity of the historic environment is not damaged

Specific reference was made to the exclusion of residents who would be impacted by the development of the International Academy on Barrack Road and those taking place in the Trinity Road Area. As noted above the proposed NA is focused on and relevant to an area where change can be implemented locally.

As preparation of the Plan is to be founded on robust community engagement those residents wanting to have a say about the development taking place in these areas can either:

- feed into the Neighbourhood Plan community engagement process or
- make representations on planning applications through the Borough Council development control procedures.

Neighbourhood Forum / Constitution

One respondent noted that the Constitution was unsound because it does not have clear objectives that relate to the objectives in the Localism Act to add value to the planning system. The Localism Act introduces a new right for communities to draw up a neighbourhood plan. It sets in place the opportunity to enable communities, both residents, employees and business, to come together through a local parish council or neighbourhood forum and say where they think new houses, businesses and shops should go – and what they should look like.

The objectives set out in the Semilong and Trinity Neighbourhood Forum Constitution are a guide for the Neighbourhood Forum in its aspiration to develop a Neighbourhood Plan. The Neighbourhood Plan itself will contain the vision and direction that can influence the future development and regeneration of the Neighbourhood Area which is the objective of neighbourhood planning contained in the Localism Act.

The following suggestions have been made through representations with respect to amending the Neighbourhood Forum and / or Constitution.

- The Constitution will need to be amended to reflect any amendments to the NA and / or Neighbourhood Forum beyond the existing proposal
- If the Racecourse is included it is suggested that membership of the Neighbourhood Forum should include representation from Abington, Castle, Phippsville and South wards, probably in form of ward councillors; resident associations backing on or facing the Racecourse; representation from sports clubs and other uses
- The Racecourse Area Group should be re-defined [in the Constitution] so its functions are carried out by the Friends of the Racecourse rather than setting up a new forum
- The number of sub-groups feeding the Facilitation Group may lead to an over-burdening unless leadership for each sub-group is from people not very actively involved at a more central level. The proposal can work so long as sub-group meetings are not too repetitive, frequent and burdensome on just a few interested parties. If sub-groups only meet as necessary then the structure is workable and to be encouraged.
- Suggestion that the Facilitation Group should be made up of the Forum Treasurer, Forum Chair, Forum Secretary; the Area Group chairs or delegated representative from their Area Group and if the need requires guests with appropriate expertise may be invited. These changes are recommended to allow a more streamlined meeting structure.

The Constitution is considered to be compliant with the Forum's legal obligations, and therefore does not have implications for the determination of the Forum and Area applications. However the need to resolve any disharmony is acknowledged and it is suggested that these issues be addressed within the community.

Conclusion

47 representations were received in response to the publicising of the applications for the Semilong and Trinity Neighbourhood Area and Forum. Of these 37 openly objected to the Racecourse being included in the proposed Neighbourhood Area and only two supported the inclusion of it. However, upon analysis, the similarity and content of the representations illustrated a lack of understanding about the neighbourhood planning process and the benefits that can be brought to a Neighbourhood Area.

There is obviously a strong sense of community and loyalty in matters which concern the Racecourse. However, excluding the Racecourse from the Neighbourhood Area would be to its detriment and miss opportunities for investing in its future as a strategic leisure and recreational facility for the town and Northamptonshire as a whole. It would be more advantageous for the Racecourse if the wider community were better informed on the benefits of neighbourhood planning. And that they were reassured that an inclusive and robust community engagement will take place to inform the development of the neighbourhood plan. This would lead to a neighbourhood planning exercise that will focus on the neighbourhood area as an area of benefit where all members of the local community who want to contribute to the neighbourhood plan are empowered to do so.