



Planning Policy Committee

A meeting of the Planning Policy Committee will be held in the The Jeffrey Room, The Guildhall, Northampton on Tuesday 28 June 2022 at 6.00 pm

Agenda

1.	Apologies for Absence and Notification of Substitute Members
2.	Declarations of Interest Members are asked to declare any interest and the nature of that interest which they may have in any of the items under consideration at this meeting.
3.	Minutes (Pages 5 - 10) To approve the Minutes of the meeting held on 16 th March and 26 th April 2022.
4.	Chair's Announcements To receive communications from the Chair.
5.	Cottesbrooke Conservation Area (Pages 11 - 98)
6.	Canons Ashby Conservation Area (Pages 99 - 112)
7.	Northampton Housing Action Plan (Pages 113 - 132)
8.	Kilsby Review Neighbourhood Development Plan (Pages 133 - 160)
9.	North Northamptonshire Strategic Plan (Pages 161 - 166)

10.	Community Infrastructure Levy - Discretionary Relief for Social Housing (Pages 167 - 170)
11.	South Northamptonshire Local Plan Part 2 - Employment Allocations Supplementary Planning Document (Pages 171 - 276)
12.	Updated West Northamptonshire Local Development Scheme (Pages 277 - 296)
13.	Northampton Local Plan Part 2: Proposed Modifications Consultation (Pages 297 - 912)
14.	West Northamptonshire Strategic Plan: Spatial Options Consultation (Pages 913 - 1192)
15.	<p>Urgent Business</p> <p>The Chair to advise whether they have agreed to any items of urgent business being admitted to the agenda.</p>
16.	<p>Exclusion of the Press and Public</p> <p>In respect of the following items the Chairman may move the resolution set out below, on the grounds that if the public were present it would be likely that exempt information (information regarded as private for the purposes of the Local Government Act 1972) would be disclosed to them: The Committee is requested to resolve: "That under Section 100A of the Local Government Act 1972, the public be excluded from the meeting for the following item(s) of business on the grounds that if the public were present it would be likely that exempt information under Part 1 of Schedule 12A to the Act of the descriptions against each item would be disclosed to them"</p>

Catherine Whitehead
 Proper Officer
 20 June 2022

Planning Policy Committee Members:

Councillor Rebecca Breese (Chair)

Councillor Matt Golby (Vice-Chair)

Councillor Adam Brown

Councillor Phil Bignell

Councillor Stephen Clarke

Councillor Jonathan Harris

Councillor Jamie Lane

Councillor Kevin Parker

Councillor Wendy Randall

Councillor Cathrine Russell

Information about this Agenda

Apologies for Absence

Apologies for absence and the appointment of substitute Members should be notified to democraticservices@westnorthants.gov.uk prior to the start of the meeting.

Declarations of Interest

Members are asked to declare interests at item 2 on the agenda or if arriving after the start of the meeting, at the start of the relevant agenda item

Local Government and Finance Act 1992 – Budget Setting, Contracts & Supplementary Estimates

Members are reminded that any member who is two months in arrears with Council Tax must declare that fact and may speak but not vote on any decision which involves budget setting, extending or agreeing contracts or incurring expenditure not provided for in the agreed budget for a given year and could affect calculations on the level of Council Tax.

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Queries Regarding this Agenda

If you have any queries about this agenda please contact Ed Bostock, Democratic Services via the following:

Tel: 07775036776

Email: democraticservices@westnorthants.gov.uk

Or by writing to:

West Northamptonshire Council
One Angel Square
Angel Street
Northampton
NN1 1ED



Planning Policy Committee

Minutes of a meeting of the Planning Policy Committee held at The Jeffrey Room, The Guildhall, Northampton on Wednesday 16 March 2022 at 6.00 pm.

Present Councillor Rebecca Breese (Chair)
 Councillor Matt Golby (Vice-Chair)
 Councillor Adam Brown
 Councillor Phil Bignell
 Councillor Stephen Clarke
 Councillor Jonathan Harris
 Councillor Jamie Lane
 Councillor Kevin Parker
 Councillor Wendy Randall
 Councillor Cathrine Russell

Officers: Jim Newton (Assistant Director, Economic Growth and Regeneration)
 Richard Wood (Interim Head of Planning and Climate Change Policy)
 Amanda Jacobs (Senior Planning Policy Officer)
 Rhian Morgan (Heritage Policy Officer)
 Paul Everard (Planning Policy Team Leader)
 Theresa Boyd (Planning Solicitor)
 Ed Bostock (Democratic Services Officer)

7. Apologies for Absence and Notification of Substitute Members

No apologies were received.

8. Minutes

The minutes of the meeting held on 16th December 2021 were agreed as a true and accurate record.

9. Chair's Announcements

The Chair announced that the HMO Policy was recently discussed at the People Overview & Scrutiny Committee where it was recommended that the Policy should stay within the remit of Housing. However, there were clear resolutions, both at the last full Council meeting and in the minutes of the last Planning Policy Committee, that it should continue to sit within the remit of the Planning Policy Committee. When ready, the Policy would go to the People Overview & Scrutiny Committee for review.

Members confirmed their agreement with the course of action as set out above.

10. Declarations of Interest

There were no declarations of interest by Members.

11. **Canons Ashby Conservation Area**

The Heritage Policy Officer presented a report which sought the Committee's agreement to consult on the draft Canons Ashby Conservation Area Appraisal and Management Plan (2022). Canons Ashby was first designated as a conservation area in 1976 and was last reviewed in 1997. An online meeting was held with members of the public in November 2021 to publicise the current review. A draft Conservation Area Appraisal and Management Plan was subsequently produced, and approval was now sought to carry out a public consultation with a view to the appraisal being adopted as a Supplementary Planning Document (SPD). The draft appraisal also included proposals to extend the conservation area in 2 locations to include a small wooded area and an area of archaeological interest, and to exclude a small area so that the boundary was in line with a scheduled monument designation in the village. Proposals for candidates for the local list of buildings and sites of archaeological and historical interest were also included in the appraisal, as well as initial proposals for Article 4 Direction, but these would be subject to a separate consultation later. The consultation would last for a 6-week period, during which time a second public meeting would be held to inform the public of the proposals and how to respond to the consultation. The next stage would be to publish all comments received along with the officer response and suggested actions, with a view of the appraisal and management plan being adopted as an SPD and the proposed boundary being adopted.

Members discussed the report.

RESOLVED:

1. The Planning Policy Committee:

- a) Agreed that public consultation be undertaken on the draft Canons Ashby Conservation Area Appraisal and Management Plan SPD (appendix A of the report), which includes proposed changes to the conservation area boundary
- b) Agreed that public consultation be undertaken on proposed Article 4(1) Direction controlling development with regards to:
 - Alteration of windows
 - Alteration of doors
 - Alterations to roofing
 - Alterations to porches
 - Addition of roof lights or skylights.

12. **Article 4(1) Directions for conservation areas in Flore, Weedon, Everdon, Little Everdon, Kilsby, Pitsford, Staverton and Welford**

Councillor A Brown declared an interest in this item as one of the respondents to the consultation was a family member.

The Heritage Policy Officer presented a report which contained responses to 2 consultations undertaken as part of the ongoing review of conservation areas within

the former Daventry District area of West Northamptonshire. Article 4 Directions were proposed for the conservation areas of Flore, Weedon Bec, Pitsford, Kilsby, Staverton, Welford, Everdon and Little Everdon. The proposals were originally consulted on as non-immediate directions in Autumn 2020; under normal circumstances the directions would have been recommended for confirmation by the September 2021 deadline. This was not possible, so a second consultation began in September 2021, with no changes to the directions at that stage. The directions were made with immediate effect at the Cabinet meeting on 12th September 2021. The second consultation had now been completed and the report before Members contained responses from both consultations. Some minor alterations to the proposed directions were contained in the report, however they did not change the sense of the directions.

In response to questions, the Committee decisions by the Council when determining planning applications, for example, decisions were based on the range of policy documents in place at the time. There was a need to strike a balance between conserving historic assets and making sure that it was done in a sustainable way; examples of best practice from Historic England was formulated with climate change and energy efficiency in mind. It was not the case that historic assets were conserved “at any expense”.

It was advised that work was underway to create an FAQ page on the Council’s website which would provide information relating to conservation areas to members of the public.

RESOLVED:

1. The Planning Policy Committee:

- a) Confirmed the Article 4(1) Directions for the conservation areas at Flore, Weedon, Little Everdon, Everdon, Staverton, Welford, Pitsford and Kilsby as amended with the changes set out in appendices A and B of the report.

13. **Great Houghton Parish Council Neighbourhood Plan**

The Senior Planning Policy Officer presented a report which sought the Committee’s consideration of recommendations made by the Independent Examiner of the Great Houghton Neighbourhood Plan and to seek approval to take the Neighbourhood Plan to referendum on 5th May 2022. An application was made by Great Houghton Parish Council on 6th March 2020 to designate the Parish Council area for neighbourhood plan purposes and was approved by Northampton Borough Council’s Cabinet on 10th June 2020. An initial consultation exercise on the draft Neighbourhood Plan was carried out by Great Houghton Parish Council in April and May 2021 and following the submission to WNC in August 2021, a further consultation was carried out in September and October 2021, also known as the Regulation 16 submission consultation. WNC had issues relating to the following:

- How the Neighbourhood Plan dealt with the proposed area of ecological enhancement contained within the emerging Policy 41 of the Northampton Local Plan Part 2

- Designation of the Brackmills employment estate buffer zone as local green space, and
- Policies relating to the natural environment should be consistent with the National Planning Policy Framework.

The Independent Examiner submitted their report on the Neighbourhood Plan to the Council on 8th February 2022. Officers were supportive of the suggested modifications contained within Appendix A of the report as they resolved the issues raised at the Regulation 16 submission consultation.

The Committee were informed that in respect of advertising the referendum, an information statement would be posted on the Planning Policy page of the Council's website and further information and details on who would be eligible to vote would be posted on the Elections page.

The Planning Policy Committee:

- a) Noted and welcomed the significant progress in making the GHNDP by Great Houghton Parish Council.
- b) Accepted the Examiner's recommended modifications in respect of the GHNDP.
- c) Accepted the Examiner's recommendation that the GHNDP, as modified in accordance with recommendation (b) above, should proceed to a referendum of voters within Great Houghton Parish.
- d) Approved the proposed decision statement set out in Appendix 1, subject to recommendations (b) and (c) above and any necessary factual alterations.
- e) Agreed that delegated authority be given to the Interim Head of Planning and Climate Change Policy to make further minor editorial changes to the GHNDP to address any factual and typographical errors and to reflect the fact that the document will be in its intended final form.
- f) Agreed that the costs of the referendum be met from the existing budget for neighbourhood planning.

14. **Upper Nene Valley Gravel Pits Special Protection Area Mitigation Strategy**

The Senior Planning Policy Officer presented a report to the Committee which sought Members' consideration to consultation responses on the draft Mitigation Strategy for the Upper Nene Valley Gravel Pits Special Protection Area and subject to proposed amendments contained in Appendix A of the report, adopt the Mitigation Strategy for use by WNC. Cabinet approved the consultation on 9th November 2021, and it ran from 13th December to 7th February 2022. 7 responses were received and raised the following issues:

- The Strategic Access Management and Monitoring Fee had been calculated incorrectly.
- The Mitigation Strategy should reference the mitigation hierarchy set out in the National Planning Policy Framework.
- The Mitigation Strategy should be explicit in that it only deals with recreational pressure and not other impacts that may result from development.
- The Mitigation Strategy should provide clarity on where bespoke mitigation may be needed.

- The Mitigation Strategy should make reference to the historic landscape in which it sits.

The proposed changes in Appendix A sought to address all of the issues raised and by adopting the Mitigation Strategy, the Council would be able to mitigate proposed and windfall development within 3km of Unit 1 of the SPA which sits within WNC's boundary and continue to protect the SPA for the reasons of its designation.

Emerging local plan part 2 was examined in November 2021. In their post-hearing letter, the Inspector set out that the Mitigation Strategy would need to be in place before the main modifications to the Plan being finalised and consulted on, due to the likelihood of wording changes required to make the relevant parts of the Plan legally compliant. Should the Committee adopt the Mitigation Strategy, the document would be appended to the existing Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document.

Members discussed the report.

RESOLVED:

1. The Planning Policy Committee:

- a) Noted the responses to the public consultation on the mitigation strategy;
- b) Accepted the recommended modifications to the mitigation strategy set out in 'suggested actions' in appendix A;
- c) Approved the adoption of the mitigation strategy, modified in accordance with recommendation (b) above, as an addendum to the UNVGP SPA supplementary planning document; and
- d) Agreed that delegated authority be given to the Interim Head of Planning and Climate Change Policy to make further minor editorial changes to the mitigation strategy to address any factual and typographical errors and to reflect the fact that the document will be in its intended final form.

15. **Urgent Business**

There was no urgent business on this occasion.

The meeting closed at 6.23 pm

Chair: _____

Date: _____

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WEST NORTHAMPTONSHIRE COUNCIL

PLANNING POLICY COMMITTEE

28 June 2022

Rebecca Breese – Planning, Built Environment and Rural Affairs

Report Title	Cottesbrooke Conservation Area
Report Author	Anna Wilson, Heritage Policy Assistant, anna.wilson@westnorthants.gov.uk

Contributors/Checkers/Approvers

Legal	Theresa Boyd	Approval email received 30/05/2022
West S151	Martin Henry	Approval email received 08/04/22
Other Director/SME	Stuart Timmis	Email sent 08/04/22
Communications Lead/Head of Communications	Becky Hutson	Approval email received 08/04/22

List of Appendices

- Appendix A – Written Responses**
- Appendix B – Survey Responses**
- Appendix C – Cottesbrooke Conservation Area Boundary Map**
- Appendix D – Local List Candidates**
- Appendix E – Cottesbrooke Article 4(1) Direction**

1. Purpose of Report

To consider the responses to the consultation exercise on the draft Cottesbrooke Conservation Area Appraisal and Management Plan and propose changes to the appraisal and further steps to implement the outcomes.

2. Executive Summary

- 1.1. The report sets out the recommendations for the adoption of the conservation area boundary as set out in Appendix C, the adoption of the Cottesbrooke Conservation Appraisal and Management Plan as a supplementary planning document, the inclusion of buildings on the Local List, and proposals for an Article 4(1) Direction. It includes details of how the statutory consultation was undertaken, the results of the consultation and the proposed resulting actions (Appendices A, B and C).

3. Recommendations

- 3.1 It is recommended that Planning Policy Committee:
 - a) Agrees that the conservation area boundary as set out in Appendix C be designated and supersedes the designation that was made in 2000.
 - b) Agrees that the proposed changes to the Cottesbrooke Conservation Area Appraisal and Management Plan in response to representations, as set out in Appendices A and B be approved.
 - c) Agrees that further minor editorial changes be made to the Cottesbrooke Conservation Area Appraisal and Management Plan including to reflect that the document will be in its final adopted form.
 - d) Agrees that the Conservation Area Appraisal and Management Plan for Cottesbrooke be adopted as a supplementary planning document.
 - e) Agrees the Local List entries for Cottesbrooke set out in Appendix D.
 - f) Agrees that an Article 4(1) for Cottesbrooke in accordance with the proposals in the conservation area appraisal and management plan be made subject to consultation (Appendix E).

4. Reason for Recommendations

- The proposals fulfil the statutory duty of the council to review and designate conservation areas where they meet appraisal criteria.
- The proposals accord with legislation and the council's planning policies.
- The proposals will provide the council with the tools to preserve and enhance the heritage of Cottesbrooke, which contributes to the historic character of the West Northamptonshire area. Without these tools the special historic interest of the village may be harmed or lost.
- The proposals are consistent with previous decisions made to designate conservation area boundaries and adopt supplementary planning documents for other towns and villages in the area.

5. Report Background

- 5.1 The Council has a statutory duty under the 1990 Planning (Listed Building and Conservation Areas) Act to review its conservation areas and to designate conservation areas where they meet appraisal criteria. At its meeting on 9 November 2021, the council resolved that consultation should take place on the draft Conservation Area Appraisal and Management Plan for Cottesbrooke. The consultation is now complete.
- 5.2 The proposals at Cottesbrooke suggested amending the conservation area boundary to include three areas of woodland and two areas of pasture in which there are archaeological earthworks.
- 5.3 The proposals also identified eight candidates for the Local List, all being situated in the proposed conservation area, and proposals for an Article 4(1) Direction.

Responses to consultation

- 5.4 Eighteen responses to the consultation were received including from the Cottesbrooke Estate and the chair of the parish meeting. Written representations were made either via letter or email with one individual responding via the online survey. Appendices A and B set out the responses received and the proposed resulting actions. A number of respondents agreed with much of the content of the appraisal, in particular the recommendations to keep street furniture to a minimum and the addition of the telephone kiosk to the Local List, but expressed concerns about the changes to the boundary, which would result in an increase in the size of the conservation area.
- 5.5 The Cottesbrooke Estate agreed that changing the boundary to include archaeological earthworks of the medieval settlement was reasonable. However, it objected to the inclusion of several areas of woodland, identified in the appraisal as BA3, BA4 and BA5. The Estate argued that the woodlands are not within the Registered Park and Garden (RPG) designation and including them would cause confusion about where the RPG boundary lies. The RPG designation incorporates the designed gardens and parkland of 18th century date but the conservation area boundaries do not necessarily include only those features that date to a particular period especially where earlier or later features also contribute to its historic/architectural interest or visual amenity. The existing Cottesbrooke conservation area boundary (designated in 2000) already deviates from that of the RPG because it includes the village.
- 5.6 The Estate also raised concerns that the management of the woodlands would be made more difficult if they were within the conservation area. The woodlands are currently subject to management plans agreed with and monitored by the Forestry Commission and conservation area status would not confer any additional controls or affect the way in which they are currently being managed.
- 5.7 Historic England did not seek any changes.

- 5.8 The draft appraisal included initial proposals for an Article 4 Direction in Section 10.2. Five respondents objected to the Article 4 proposals due to the extra complexity and cost of submitting a planning application. The types of development for which permitted development rights would be removed are those which would normally be undertaken by property owners on an occasional basis, for example, replacement of windows. Therefore, it is considered that the costs of submitting a householder planning application would not be prohibitive. There are no suggested changes as a result of the consultation exercise and it is suggested that an Article 4 Direction be prepared for the proposed restrictions set out in the draft appraisal.

6. Issues and Choices

- 6.1 Conservation area status and an adopted appraisal and management plan, which has the status of a supplementary planning document (SPD), adds weight to the consideration of non-designated heritage assets in decision making. It also provides detail for applicants and decision makers on the special interest of the conservation area as a designated heritage asset. The proposed conservation area boundary and appraisal and management plan have been produced with the aim of providing proportionate and effective means of protecting the special architectural and historic interest of Cottesbrooke for the benefit of present and future generations.
- 6.2 The alternative options would be not to endorse the designation of the conservation area boundary and the adoption of the Cottesbrooke Conservation Area Appraisal and Management Plan as a supplementary planning document, not to endorse the candidates for the Local List, and not to ‘make’ the Article 4(1) Direction.
- 6.3 Not endorsing the boundary designation, the adoption of the appraisal and management plan, not endorsing the candidates for the Local List, and not ‘making’ the proposed Article 4(1) Direction would leave the council without valuable tools with which to protect and enhance the special architectural and historic interest of Cottesbrooke.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 Adopting the appraisal, designating a new conservation area boundary and making Article 4 directions would have no material financial effects. Minor costs for placing adverts in the London Gazette and a local newspaper will be covered from existing budgets.

7.2 Legal

- 7.2.1 Supplementary Planning Documents (SPDs) are defined by the Planning and Compulsory Purchase Act 2004. The detailed requirements for SPDs and their adoption are provided by the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 7.2.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on local authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 7.2.3 The SPD would supplement existing policies, predominantly the West Northamptonshire Joint Core Strategy and the Settlements and Countryside Local Plan (Part 2) 2020.
- 7.2.4 Directions under Article 4 of the Town and Country Planning (General Permitted Development)(England) Order 2015 (No. 596) require planning permission to be obtained for works which would otherwise be permitted development.

7.3 **Risk**

- 7.3.1 There are no material risks foreseen in the endorsement of the conservation area designation, adoption of the appraisal and management plan or the making of the Article 4(1) Direction.
- 7.3.2 Not endorsing the conservation area designation, adoption of the Appraisal and Management Plan and the making of the Article 4(1) Direction would be likely to weaken protection for heritage in Cottesbrooke and thus increase the risk of its loss.

7.4 **Consultation**

- 7.4.1 The Cottesbrooke Conservation Area Appraisal and Management Plan consultation document was subject to a formal eight-week public consultation which began on 22 November 2021 and ended on 17 January 2022. This followed an initial online exhibition held on 28 July 2021. Due to the circumstances surrounding the Covid-19 pandemic it was not considered that a physical public meeting could be safely held during the consultation. Instead, a virtual public meeting was held on 14 December 2021. This was attended by 5 individuals, 1 of which was the chair of the parish meeting. The PowerPoint presentation and notes were subsequently made available on the council's website.
- 7.4.2 As noted in the appraisal a separate consultation exercise is beneficial before an Article 4 Direction has effect. The process for this type of Article 4 Direction requires that they be 'made' and then consulted on. Only if an Article 4 Direction is confirmed

does it have legal effect. Following consultation the matter would be brought back to Planning Committee for the direction to be confirmed or not.

7.5 Consideration by Overview and Scrutiny

Not applicable

7.6 Climate Impact

- 7.6.1 The designation of the conservation area and adoption of the Appraisal and Management Plan as a Supplementary Planning Document are unlikely to have a negative impact on the climate.

7.7 Community Impact

- 7.7.1 It is unlikely that the adoption of this document would have any material effect on crime or disorder.
- 7.7.2 The proposed course of action should not have any perceptible differential impact on people with protected characteristics.
- 7.7.3 Endorsing the designation of the conservation area boundary and the adoption of the conservation area appraisal and management plan as an SPD would assist in conserving the historic character of Cottesbrooke and contribute to preserving the character of places which make up West Northamptonshire. As such, it would support the well-being of residents and those who work in or visit Cottesbrooke and the wider area.

8. Background Papers

Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework

Planning (Listed Building and Conservation Areas) Act 1990

The Town and Country Planning (Permitted Development and Miscellaneous Amendments) (England) Regulations 2020

West Northamptonshire Council Cabinet Report 9 November 2021 - Permission for consultation on draft Cottesbrooke Conservation Area Appraisal and Management Plan and proposed boundary.

Appendix A – Written responses

Respondent	Comments	Suggested Response	Suggested Action
John Harris, Chair of Cottesbrooke Parish Meeting	<p>I write to express my opposition <u>to any</u> extension of the Cottesbrooke Conservation area for the following reasons:</p> <ul style="list-style-type: none"> - Cottesbrooke is and always has been a beautiful village. Certainly not because it is in a conservation area, but because over the centuries the owners of the village have fostered and nurtured it carefully in a way that has also enabled the self same owners to survive commercially. Now the wider community also recognize that fact they feel the need to want to micro-control it. A conservation area status is going completely against this principle of self determination, in essence saying 'we know better than you' and 'we know what is good for you'. Since 2000 the council effectively micro control any planning issue. - The area covered is immense. Why? There are already more than adequate planning controls in place. 	<p>Comment noted.</p> <p>Though conservation area status confers the requirement for planning permission for particular types of development it does not apply to an extensive list of development types. Those for which planning permission is needed are set out in Section 2.3 (p.6-7) of the Cottesbrooke Conservation Area Appraisal and Management Plan and the conservation area page of the council's website www.westnorthants.gov.uk/planning-and-building-control/conservation-areas The requirement for planning permission is aimed at protecting the special architectural and historic character of Cottesbrooke, which makes it such an attractive and distinctive area of settlement and countryside.</p> <p>In the past, conservation areas tended to focus quite strongly on historic buildings, which meant that the boundaries were often drawn quite tightly around the built extent of a village. More recently, there has been a move towards a more holistic</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

		<p>approach when considering heritage. In terms of conservation areas that means looking at the settlement and its wider surroundings and the landscape it sits within. This approach is set out in the best practice guidance issued by Historic England 'Conservation Area Appraisal, Designation and Management', Historic England Advice Note 1, 2019. The reason that the conservation area covers a large area is that it includes Cottesbrooke Hall, its gardens and parkland, which are hugely important in terms of the inter-relationship between the hall and the village and how the hall has influenced the development of the village over several centuries. Much of the area is designated as a Grade II Registered Park and Garden but having it within the conservation area further reinforces its importance.</p> <p>The additional planning controls that conservation area status brings relate mainly to small-scale development which often occurs on residential properties. On their own, these changes may seem insignificant but cumulatively they can have a detrimental effect on the historic character of the area and gradually erode that character. The requirement for planning permission for particular types of development within a conservation area provides the opportunity to steer development so it is sensitive to the</p>	
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	<p>- This is palpable nonsense given the track record of some of the other developments that seemingly are passed through the same planning office. (Demolition of the Red Lion in Brixworth so that a supermarket can be built on a blind corner, odd shaped houses allowed to built on the corner of Creaton and Hollowell roads and the proliferation of warehouses that employ virtually no one etc, etc,etc). Similarly, the Northampton Development Corporation did more cultural and architectural damage in the 1970's than the Luftwaffe ever managed in the 1940's.</p> <p>I also fear that this policy will lead to the attempted preservation of something that has never existed. Cottesbrooke has always changed with the times because it has had to. The Blacksmith finally closed in the 1970's, the tied houses have evolved into rental accommodation as a reflection of changing farming structures. The working farmyard in the centre of the village moved to its edge in the 1980's. Moreover, what are you trying to conserve? Cottesbrooke in the 1780's, the 1880's or the 1980's? Your paper seems to refer to the 1830's and rest assured, the village has certainly</p>	<p>historic and architectural character of the village.</p> <p>All planning applications are considered on a case-by-case basis against local and national planning policy. In the case of the Red Lion in Brixworth, which was within Brixworth conservation area, the planning committee of Daventry District Council refused planning permission but the decision was appealed by the applicant and upheld by the Planning Inspectorate.</p> <p>It is recognised that places change and evolve so the purpose of a conservation area is not to preserve everything as it was 50, 100 or 200 years ago. Its purpose is to recognise that a place has a special and distinctive character and to ensure that if changes take place they are managed in a way that conserves and enhances that special character.</p>	<p>No change.</p> <p>No change.</p>
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	<p>changed since that period. For example, before the first world war there was a proliferation of Beech trees which were sown for gun stocks in 1914-18. That was evolution out of necessity, not choice and probably would contravene the ethos of the conservation status?</p> <p>Moreover, what do you think we the residents are all going to do? Chop down trees? Put in plastic double glazing en masse? If that was going to have happened it would already have done. Years ago. You are now trying to shut a stable door to stop a horse that has never tried to bolt or even wants to bolt.</p> <p>I am afraid that I believe the owners of the village know better what is good for the village than a remote form of pedantic and costly bureaucratic control system operating out of an office 15 miles away. I objected to this</p>	<p>Inappropriate changes do not necessarily need to be made en masse to have a negative effect on the historic character of a conservation area. As has already been mentioned, incremental changes can lead to the gradual erosion of character. Whilst residents of the village may currently appreciate the village's history, that may not always be the case if properties change hands and new residents move into the area. The requirement for planning permission for particular types of development in the conservation area ensure that there is a conversation between property owners and planners about the details of development proposals so they are sensitive to the character of the conservation area.</p> <p>Comments noted.</p>	<p>No change.</p> <p>No change.</p>
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	nanny state type of government 20 years ago and I do so again now.		
Alistair MacDonald-Buchanan, for and on behalf of the Cottesbrooke Estate	<p>Thank you for the opportunity to comment on the draft Cottesbrooke Conservation Area Appraisal and Management Plan hereafter referred to as 'the draft Appraisal'. On the whole there are a number of guiding principles within the document that are not disputed; indeed, a great number have been employed by the Estate for decades. For example, the restrictions on the placement of satellite dishes, consistency of paint colours, no UPVc windows on the Estate properties, maintenance of hedged boundaries and so on.</p> <p>Arguably, the reason that Cottesbrooke has become such an attractive asset in Northamptonshire is because of the Estate's managing principles. Much of the report seems well balanced and well researched by the officers.</p> <p>The comments below have been prepared by Deborah Evans, DE Landscape and Heritage, CMLI, IHBC, MA, a heritage consultant with a specialism in landscape. In addition there are contributions from Fisher German and the Cottesbrooke Estate.</p>	Comments noted. It is acknowledged that the Cottesbrooke Estate has been managed to a high standard to date.	No change.

	<p>Summary</p> <p>The Cottesbrooke Conservation Area was designated in 2000. The conservation area includes the whole village of Cottesbrooke, several areas of pasture to its south and the Registered Historic Park and Garden of Cottesbrooke Hall, including key listed buildings such as the mansion, Cottesbrooke Hall (Figure 1 refers). The designation of the conservation area evidences its rich time depth and the long-term stewardship of the Cottesbrooke Estate in sustaining its distinctive rural character.</p> <p>The initial Conservation Area proposed by the planning officers in 2000 included the majority of the residential built environment, hugging the village curtilage, and largely dovetailed into the boundary of the grade II registered Cottesbrooke park and garden (please see Appendix I). However, the planning committee decided to go against the planning officers' recommendation because they insisted on including Cottesbrooke Hall. This posed a dilemma for the officers and their only option was to include the whole of the area designated as Registered Historic Park and Garden – the only boundary that made any sense if Cottesbrooke Hall was to be included.</p>	Agreed.	No change.
		<p>As the Daventry District Council Planning Committee report from September 2000 demonstrates, the inclusion of the registered park and garden within the conservation area when it was first designated was not solely driven by the wish to include Cottesbrooke Hall, as the respondent suggests. As the report states, although registered park and garden status is a material consideration in determining planning applications, it does not confer additional planning controls. Therefore, its inclusion within the conservation area gives it greater statutory protection as well as strengthening its protection through Policy ENV7 of the Local Plan.</p>	No change.

	<p>The resulting conservation area that was finally approved increased from some 54 acres to 520 acres to satisfy the perceived need to incorporate Cottesbrooke Hall. This area includes parkland, woodland, arable land and pasture farmland.</p> <p>It is understood that the local authority has a statutory requirement to undertake periodic review of the conservation area (1990 Planning [Listed Building and Conservation Areas] Act) to review the architectural and historic interest of the designation and to assess whether its boundary is fit for purpose.</p> <p>A draft appraisal has been published for consultation. This proposes to extend the existing designation boundary with the intention of the revised conservation area appraisal and management plan becoming Supplementary Planning Guidance (SPG) to help ‘manage change in a manner sensitive to the character and appearance of the conservation area’ (3.1 refers). The SPG would be a material consideration in the determination of any planning or development proposals.</p> <p>This response sets out the existing designations, undertakings and</p>	<p>Agreed.</p> <p>Agreed.</p> <p>Comment noted.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p>agreements to demonstrate the existing levels of protection and management which guide the use and appearance of the landscape and the built environment. It continues by considering what benefit may be brought to the landscape and, by association the built environment, by extending the existing conservation area.</p> <p>Existing designations and undertakings</p> <p>The historic environment of Cottesbrooke is highly designated. These designations offer complementary layers of protection to help sustain the individual and collective significance of the heritage assets, which are integral to the conservation area, such as:</p> <p><i>Listed buildings:</i></p> <ul style="list-style-type: none"> Cottesbrooke Hall (mansion) Grade I (NHL: 1356891) Cottesbrooke Hall, outbuildings and walls Grade II (NHL: 1055751) Cottesbrooke Hall, statue of Socrate Grade II (NHL: 1356892) Cottesbrooke Hall, gate piers and gates Grade II (NHL: 1067099) Cottesbrooke Hall, Statue of Homerus Grade II (NHL: 13666648) 	Comments noted.	No change.
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	<p>Cottesbrooke Hall, Statue of Epaminondas Grade II (NHL: 1067100) Cottesbrooke Hall, Statue of Licurgus Grade II (NHL: 1067101) Cottesbrooke Hall, Bridge Grade II (NHL: 1055745) Cottesbrooke Hall, Lodge, Gates and Gatepiers (west), Grade II (NHL: 1055735) Cottesbrooke Hall, Lodge, Gates and Gatepiers (east), Grade II (NHL: 1356893) Church of All Saints, Grade I (NHL: 1067102) The Old Rectory, Grade II (NHL: 1038538) The Old School Cottages, Grade II (NHL: 1039111) 1&2, Grade II (NHL: 1356894) 3&4, Grade II (NHL: 1038306)</p> <p><i>Conservation Area</i> The Cottesbrooke Conservation Area is described at 3.1 and it was adopted c. 2000. The purpose of the conservation area is to help conserve 'an area of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance' (Section 69 Planning [Listed Buildings and Conservation Areas] Act, 1990). The designation illustrates the time depth, scale and massing of the village and its surrounding landscape.</p>	<p>Agreed.</p>	<p>No change.</p>
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	<p>Trees within the conservation area are subject to regulation which are adhered to by the estate. There are presently no individual Tree Preservation Orders or Tree Preservation Order Areas within the Cottesbrooke Conservation Area.</p> <p>Work undertaken within woodland found within the conservation area is addressed by an established Woodland Management Plan (WMP) and an accompanying English Woodland Grant Scheme (EWGS).</p> <p>Following consultation on the original conservation area boundary in 2000, the estate supported a southern boundary to the designation around the village as proposed by the local authority (Cottesbrooke Estate Response to the Proposed Cottesbrooke Conservation Area, 26th May 2000, Appendices 1 and 3). The estate wished to support a 'practical and logical conservation area boundary for the village': this remains the intention.</p> <p><i>Registered Historic Park and Garden (NHL: 1001028)</i> Cottesbrooke Hall is included on Historic England's <i>Register of Historic</i></p>	<p>Agreed.</p> <p>Comments noted.</p> <p>The purpose of the review that commenced in 2021 is to assess the whole boundary of the conservation area. If there are areas within the boundary that have deteriorated or have been negatively affected by development to an extent that they no longer make a positive contribution, the boundary can be altered to exclude these areas. The current review did not find any such impacts within Cottesbrooke Conservation Area and, therefore, does not recommend changes to the boundary to exclude any particular areas.</p> <p>Comments noted. Whilst the Registered Park and Garden designation relates to the designed gardens and landscape park that was largely created in the late 18th</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p><i>Parks and Gardens of Special Historic Interest</i> at Grade II, which attributes national interest. The registered area extends to c. 250ha of formal gardens, parkland and woodland: it is broadly contiguous with the existing conservation area boundary. The site was added to the register in 1984, the designation description was written in 1998 and reviewed in 2000. Research informing the designation was undertaken by Dr. Paul Stamper, a national expert on historic designed landscapes, who also authored the designation description. As part of his work he reviewed the mapped record from 1780 on; this evidences the evolution of the designed landscape. His key sources are recorded on the register description. The understanding of the landscape would have been ground-truthed to establish intactness and character as part of the registration process. This determined the zenith of the designed landscape was as recorded by the First Edition Ordnance Survey c. 1886. This standard approach was adopted by the then English Heritage designation department. The established boundary of the registered park is therefore informed by this research.</p>	<p>century, there is no presumption that the conservation area boundary must follow that of the registered park and garden, particularly if subsequent features of the landscape make a positive contribution to its present character and appearance.</p>	
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	<p><i>Undesignated heritage assets</i></p> <p>The conservation area includes many examples of 'undesignated heritage' assets as understood by the National Planning Policy Framework (NPPF, July 2021) and Planning Practice Guidance (PPG). Within the registered park, such features include a ha ha along the east boundary of the park, 'Broken Bottle Bridge' and relic ridge and furrow earthworks.</p> <p>These heritage assets, together with the designated heritage assets, are subject to the concept of 'setting' as described by the NPPF/PPG and supporting sector guidance. The draft appraisal notes and discusses setting on p 7 and at 9.8. While setting is not fixed, the individual and collective settings of the heritage assets may extend beyond the established designated boundaries. The potential impact upon the setting of a heritage asset is a consideration in the determination of a planning application and the estate is aware of this.</p> <p><i>Inheritance Tax Exemption, Agreement and Undertakings</i></p> <p>While not a designation in itself, the core of the Cottesbrooke estate is subject to an Inheritance Tax Exemption (ITE) agreement with HMRC to protect the historic and</p>	Comments noted.	No change.
		Comments noted.	No change.

	<p>natural interest of the site. The agreement and its associated undertakings concerns 110 acres within the registered park and conservation area. This includes the formal and wild gardens, the lake, the lodges and six cottages. The undertakings are informed by a Heritage Management Plan (HMP), 1989, and the site is regularly inspected and monitored by Natural England and Historic England on behalf of HMRC.</p> <p>The HMP refers to specific features found within the traditional, working landed estate with policies for their conservation and care. These features are:</p> <ul style="list-style-type: none"> • Axial vistas, avenues and individual parkland trees; • Woodland areas; • The lakes; • Permanent pasture; • The Mitchell Bridge; • Small scale buildings and cottages, and, • Access <p>This is a clear and powerful indication of the public value attributed to Cottesbrooke and the commitment of its owners since 1937, the MacDonald-Buchanan family, to its long-term and appropriate stewardship.</p>	<p>It is acknowledged that the owners are committed to conservation and care of the Cottesbrooke estate. Whilst the HMP is a valuable method of managing and protecting various features of the parkland, gardens and a selection of building, the conservation area designation also affords statutory protection to those features that are not covered by the HMP.</p>	<p>No change.</p>
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	<p><u>Other land-based agreements</u></p> <p><i>Countryside Stewardship</i></p> <p>The Cottesbrooke Estate has benefitted from successive Countryside Stewardship Agreements. The present agreement runs until 2026. This agreement is informed by a comprehensive and multi-disciplinary Parkland Management Plan (PMP) which focused on the registered park. It was prepared in 2019 by the specialist consultancy, The Landscape Agency. This plan was signed off by Historic England and Natural England following consultation during the plan process. The plan shares the established understanding of the history and significance of the registered park and its associated heritage assets, including any established boundaries, and accommodates the requirements of the HMP.</p> <p>The historic landscape and built features benefitting from the agreement are subject to monitoring by Natural England. The agreement has already facilitated important conservation work within the registered park such as the partial desilting and repair of the Ladies Pool and its associated water features and arable reversion within the park to</p>	Comments noted.	No change.
		Comments noted.	No change.

	<p>help enhance and sustain its landscape character.</p> <p><i>Woodland Management Plan/English Woodland Grant Scheme</i></p> <p>The Estate has been engaging for over 30 years with the Forestry Commission (FC) to undertake sustainable woodland management. The current Forestry Commission approved woodland management plan expires on 5th July 2028. This scheme is the successor to a previous scheme that commenced in 2005. The management of the landscape is a key component of the Forestry Commissioner's decision making process and always forms part of any consents granted.</p> <p>Woodland within the registered park, including ornamental planting and boundary plantations and belts, is subject to a WMP administered and monitored by the Forestry Commission. This plan considers the silvicultural, landscape and ecological importance of the woodlands and tree planting. It is supported by detailed and agreed work schedules for each identified woodland compartment for work such as thinning, cyclical felling, natural regeneration and targeted planting. Work associated with this plan is subject to monitoring by the</p>	<p>Comments noted.</p>	<p>No change.</p>
		<p>Conservation area status usually confers a requirement for the property owner to notify the council of any proposed works to trees over a particular size six weeks prior to those works taking place. However, where a woodland management plan has been agreed with the Forestry Commission, it is the Forestry Commission which notifies the council about the proposed works, rather than the landowner. Therefore, including the three additional areas of woodland within the conservation area should not result in additional administrative work for the estate.</p>	<p>No change.</p>

	<p>Forestry Commission and is carried out under any required procedures such as Felling Licenses. An EWGS complements the recommendations of the WMP.</p> <p>The PMP refined aspects of the woodland and parkland planting by setting out complementary recommendations to the WMP together with future planting strategies. The latter focusses of the succession planting of parkland trees to help conserve and emphasise important design features such as clumps, specimens and the ratio of broadleaves to conifers found within the landscape.</p> <p>Other notable observations on the content of the draft appraisal</p> <p><i>4. Summary of Special Interest</i></p> <p>This summary refers to 'many fine views'. They are not necessarily consistent with those identified by the PMP (7.6 refers).</p> <p>The assessment of planted features within the landscape, such as avenues (Figure 40 refers), does not differentiate between known historic planting, such as the main northwest/southwest axis centering on the mansion, or the more recent</p>	<p>Comments noted.</p>	<p>No change.</p>
		<p>During the appraisal, officers did not have access to the PMP and were therefore unable to compare views within the draft appraisal and those included in the PMP. Please see further comments below relating to views.</p> <p>The features of historic planting are shown on Figure 28, Section 6, in the Historical Development section of the appraisal focusing on features of 18th and 19th century date. The Lime Avenue was not included as it was a relatively recent feature (1980s) but it can be added to</p>	<p>See suggested changes below in the section that deals with views in more detail.</p> <p>Section 6, Figure 28, p.34: Add the Lime Avenue to the Figure 28 and amend the key to include the date of this feature.</p> <p>Section 7.5, Figure 40, p.45:</p>

	<p>plantings, such as the lime avenue to the east of the mansion, which actually contains poor quality trees and requires refinement.</p> <p><i>7. Spatial Character</i></p> <p>7.1 This notes Cottesbrooke falls within a Special Landscape Area (SLA) confirmed in 2020. This is a non-statutory local landscape designation intended to draw attention to areas of countryside of high visual quality with integral historic and natural environment significance. The SLA would be a consideration in the determination of planning applications and any wider development proposals and the estate is aware of this. The text continues by confirming the character and amenity of the landscape around Cottesbrooke which reflects its recognized purpose as the principal village within a traditional landed estate.</p>	<p>Figure 28 to make that clear. Figure 40 has been included in Section 7 to show various features that are also considered to be of spatial and visual importance and they are not, therefore, differentiated by their date of origin. This figure will be amended to include those features of historic planting, where they still exist, that are included in Figure 28. Refinement of the Lime avenue will not be prevented due to the fact that it is mentioned in the appraisal as a landscape feature, although notification of works to individual trees will be required by the council at least six weeks prior to those works proceeding.</p> <p>Agreed. Details of the Special Landscape Area (SLA) are set out Section 5-Location and Context. Some additional text will be added to Section 7.1 to reinforce that the natural topography and its use by the estate in the designed elements of the landscape have been influential in the quality of the landscape that is seen today.</p>	<p>Amend Figure 40 to include those areas of planting to the north of Cottesbrooke Hall in order to highlight their spatial and visual importance as well as their historical significance, as shown in Figure 28.</p> <p>Section 7.1 – Spatial Character Summary, p. 35, add the following text at the end of the first paragraph:</p> <p><u>"It reflects the local, natural topography and how it has been utilised over time in the design of the landscape, for both agricultural and recreational use".</u></p>
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	<p>Indeed, the quality of the landscape reflects the local topography, the design response of the estate over time to that topography, its use of land and the influence of fox hunting in the eighteenth and nineteenth centuries, specifically, upon the landscape's character.</p> <p>7.2 Areas of Archaeological Potential This identifies areas within the proposed conservation area boundary where areas of archaeological potential have been identified (Figure 31 refers). It also includes areas beyond the proposed boundary (AP3, AP5, part of AP6, AP7, AP11, AP12, part of AP13, AP20, AP21 and AP22), which is confusing. The archaeological resource of the registered park was considered in detail as part of the PMP. This included an assessment of LiDAR data and recorded features such as lost drives and relic ridge and furrow. Policies and actions were agreed to help protect this archaeology, such as the requirement for an archaeological watching brief associated with specific conservation projects. Actions such as tree planting also consider the underlying archaeology when identifying future planting locations.</p>	<p>7.2 The known areas of archaeological potential within and on the fringes of the conservation area were determined by consulting the Northamptonshire Historic Environment Record (HER), which incorporates sources such as fieldwork records, LiDAR data, aerial photographs and other documentary records. Several of the areas of archaeological potential straddle the boundary of the conservation area (AP2, AP3, AP6 and AP13) and therefore merit consideration. It is also important to consider those areas that fall outside of the conservation area boundary but in its vicinity. This is because they may indicate the presence of as-yet unknown archaeological deposits within the conservation area. This is standard practice in any heritage assessment that includes an archaeological element.</p>	<p>No change.</p>
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	<p>Given that the majority of the park is managed as permanent pasture, risk to archaeology is considered to be low. Conservation work to historic features within the park is undertaken by the estate to the required standards associated with the historic environment, such as Listed Building Consent, and any requirement for a specific archaeological assessment would form part of this process.</p> <p><i>7.3 Public Open Spaces</i> This section provides a useful description of recognized open space used by the public within the conservation area which contributes to its special character and interest. It should be noted that the playing field is privately owned by the Estate but let to Cottesbrooke Village Hall Limited. The value of these spaces is not disputed nor is their contribution to the conservation area and to other heritage assets or to the SLA</p>	<p>7.3 Thank you for providing information about the ownership of the playing field. It will be removed from Figure 40 and the corresponding text removed from Section 7.3 and incorporated into the Open Space Analysis in Section 7.7.</p>	<p>Section 7.3-Public Open Spaces, p.41, first paragraph, remove the following text: "A third important open space is the playing field and space surrounding the village hall on the south side of Station Road. As well as providing an important recreational amenity for residents, this area contributes to the setting of the Grade II listed Old School Cottages on the opposite site of the road. Although there has been some landscaping to create the football pitch, which may have resulted in the loss of some archaeological earthworks, the area retains its open character and form, which dates back to at least the 19th century, as demonstrated by the 1839 Tithe Map. It contributes to the dispersed character of the east end of the village."</p>
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			<p>Figure 40, p. 45 remove the playing field from the map.</p> <p>Section 7.7-Open Space Analysis, p.60, third paragraph, amend text to read:</p> <p>"OS5: Playing field and playground on south side of Station Road This area makes a significant contribution to the character and setting of the conservation area. Now a playing field and playground, <u>which provides an important recreational amenity for the village</u>, this area contributes to the rural character of the village with views through trees on the southern boundary to the open countryside. By 1628 the open space was divided into five plots, two of which had buildings upon them. Although the internal divisions no longer exist, the external boundary reflects that on the 1628 map <u>and the 1839 Tithe Map</u> and is therefore important in terms of the historic morphology of the settlement. Although the Grade II listed building, the Old School Cottages (1-5) is on the opposite side of the road, <u>this open space</u> the playing field contributes to its setting. <u>It also contributes to the dispersed character of the east end of the village.</u>"</p>
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	<p>7.4 Footpaths This section provides a useful summary of the public footpaths within the vicinity of the conservation area. The Cottesbrooke Estate maintains public rights of way within its ownership as required to enable continued access to the estate and to allow for its greater appreciation. The Estate also provides over 4,500m of permissive paths for public access.</p>	<p>7.4 Comments noted. It is agreed that the public footpaths and permissive paths enable the public to enjoy the Cottesbrooke Estate. Details of the permissive paths are not included in the conservation area appraisal because additional information about their various locations has not been provided.</p>	<p>Section 7.3-Public Open Spaces, p.41, remove Figure 35 and move to Section 7.7-Open Space Analysis, p. 60, under third paragraph.</p> <p>No change.</p>
	<p>7.5 Trees This section notes there are presently no Tree Preservation Orders or Tree Preservation Order Areas within the</p>	<p>7.5 It is agreed that the trees within the conservation area are managed well under the various agreements and management</p>	<p>No change.</p>

	<p>conservation area. This is important, the success of existing agreements and the good stewardship of the estate has not required this. The section continues by listing some 'important individual and groups of trees', although this appears to be based on a general appreciation of the trees rather than on any detailed historical or arboricultural assessment (Figure 40).</p> <p>Of these trees, all which lie within the registered park, were surveyed and assessed as part of the PMP with provision for targeted tree work, replanting or even removal. The future management of, specifically, the avenues to the northwest and southeast of the mansion is assured. Note: the northwest extension of the northwest/southeast axis is to be refined as follows:</p> <ul style="list-style-type: none"> • To the east of the road: the exiting conifer stands are to be refined to allow for an increase in wood pasture. The axial line will be retained as a central ride between clumps and new specimen trees. To the west of the road, new specimen tree will continue to frame the view to the northwest, and, 	<p>plans. This successful management of trees suggests that the conservation area status is not prohibitive. The individual and groups of trees highlighted in the appraisal are those which make a particular contribution to the conservation area's character, for example by being a prominent feature within a view, channelling views towards other features and/or their historic importance in the deliberate design of the landscape. At the same time it is made clear in the appraisal that important trees are not limited to those which are mentioned in the document.</p>	
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	<ul style="list-style-type: none"> The young lime avenue to the east of the mansion. This planting is partly failing. The PMP has recommended the removal of the failing trees but the retention of the view by planting c. 60 new parkland trees individually and in loose groups to create a more informal edge to this recent intervention. <p><i>Other trees</i> Ornamental trees within the formal gardens of Cottesbrooke Hall are subject to the ongoing management and evolution of those gardens. Cottesbrooke Hall is one of the most celebrated gardens in the East Midlands and demonstrates the highest horticultural and arboricultural standards.</p> <p>Yew trees in the church yard. These are both within the existing conservation area and contribute to the setting of the Grade I listed building. They are part of the character of the churchyard and therefore unlikely to be removed unless dangerous and then very likely to be replaced.</p> <p>The tree in the garden of the Old Post office. This is outside the ownership of the estate but it is already subject to</p>	Comments noted.	No change.
		Agreed.	No change.
		Agreed	No change.

	<p>regulation as part of the conservation area.</p> <p>7.6 Views This section identifies ‘important’ views within the conservation area but no standard methodology, such as GLVIA 3rd edition, appears to have been employed. Dynamic and designed views, based on historic evidence and found within the registered park, are addressed by the PMP and illustrated by Figure 4.19 in that report.</p> <p>The views identified by the draft appraisal correspond with the PMP as follows:</p> <ul style="list-style-type: none"> • V1, V16 = framed view southeast along avenue (axial line recorded c. 1720) • V11, V12, V28 = Framed view northwest along avenue (axial line recorded c. 1720); • V17, V26 = designed views from the house and area of Ladies Pool. • View 15 broadly corresponds with a view identified by the PMP to the east of a woodland, and, • V27, V29, V25 = These are incidental views identified by the 	<p>7.6 The GLVIA 3rd Edition methodology principally relates to assessing the impact of proposed development on views as part of Environmental Impact Assessment or Strategic Environmental Assessment, rather than identifying, in the first instance, which views are of importance. Views that contribute to the significance of Cottesbrooke Conservation Area were identified in accordance with Historic England’s guidance ‘Appraisal, Designation and Management of Conservation Areas: Historic England Advice Note 1’ (Second Edition), 2019.</p> <p>The respondent’s comments concentrate on those views that are included in both the PMP and the conservation area appraisal. Other views that are not mentioned by the respondent are included within the appraisal but fall mainly within the village.</p>	<p>No change.</p> <p>See suggested changes below.</p>
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	<p>draft appraisal which have no historic basis.</p> <p>Note: No views are recorded from the historic northern driveway by the draft appraisal. The PMP records four dynamic views from this feature looking north, northeast and south towards the mansion.</p> <p>The PMP identified no key designed views in the area to the south of the house. The views identified by the draft appraisal in this area are therefore considered to be incidental.</p>	<p>The views included in the appraisal are those which were recorded from publicly accessible locations. Should additional information about these four views from the historic northern driveway be received it could be incorporated into Section 7.6 of the appraisal.</p> <p>As there are so many incidental views within the parkland and gardens of Cottesbrooke Hall, specific views which are not designed views will be removed from the appraisal. Instead, text will be added at the beginning of Section 7.6 to explain the importance of incidental views.</p>	<p>Section 7.6 – Views p.46, changes to be made to the text and Figures 41 and 42 on receipt of additional information about four views from the historic northern driveway.</p> <p>Section 7.6-View and Vistas, p. 46, add the following text after the second paragraph:</p> <p><u>"Within the gardens and parkland of Cottesbrooke Hall there are a number of designed views which form an important element of its character. They are identified in the appraisal. There are also many incidental views. Although they are not identified individually within the appraisal they are no less important for the contribution they make to the parkland and rural character of the conservation area and its setting as well as its visual amenity."</u></p> <p>Section 7.6-Views and Vistas, p. 46-50, remove text relating to views 4, 13, 18, 19, 25, 27 and 29 and re-number remaining views.</p>
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	<p>7.7 Open Space Analysis This section is informed by a methodology employed by Alan Baxter Ltd for land around Craven in the Yorkshire Dales¹</p> <p>The criteria offers a useful approach to evaluating the land within and around the proposed conservation area boundary (Figure 53 refers). The purpose of the exercise is, however, questioned. Cotesbrooke Estate is a large landowner able to exert a level of control over its holdings to provide a consistent management approach in contrast to the multiple owners found around Craven. The estate is an active agricultural operation, managing land as arable, pasture or</p>	<p>7.7 Agreed. The methodology is referenced and the criteria on which the open space analysis is based are set out in Section 7.7, p. 58.</p> <p>The purpose of the open space analysis is to identify important features or elements of an open space. This enables its level of significance to be assessed in terms of its contribution to the character and setting of the conservation area. It also helps to ascertain whether a particular open space merits inclusion. The analysis found that proposed extensions BA1 and BA2 merit inclusion in the conservation area. Whether the various open spaces are under multiple ownerships or are under single ownership is not one of the criteria</p>	<p>Section 7.6-Views and Vistas, Figure 41, p. 51, remove images of views 4, 13, 18, 19, 25, 27 and 29 and re-number remaining views..</p> <p>Section 7.6-Views and Vistas, Figure 41, p. 51, remove reference to views 4, 13, 18, 19, 25, 27 and 29 from Figure 42 and re-number remaining views..</p> <p>No change.</p> <p>No change.</p>
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¹ The text refers to an Historic England methodology. The methodologies endorsed by the Craven study are Conservation Area Appraisal, Designation and Management, Historic England Advice Note 1, 2016 (second edition, 2019) and The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3, 2015 (second edition, 2017)

	<p>woodland with integral open spaces within the village and wider landscape contributing to its recognized character.</p> <p>This character would be a consideration should any form of development arise particularly within the areas identified outside the proposed conservation area boundary. Such areas are also likely to be considered as part of the setting of the existing conservation area, the registered park and of the individual and collective heritage assets therein, which all convey an understanding and appreciation of the open space. The presentation of 'open space' as a consideration in its own right therefore risks confusion and duplication.</p>	<p>against which open spaces are assessed. It is acknowledged, however, that consistent management of open spaces on the periphery of Cottesbrooke Conservation Area is a positive attribute.</p> <p>Contrary to the respondent's comments, the analysis in Section 7.7 of the appraisal does not look at open space as a consideration in its own right. As explained above, it is the various features within an open space, including views of and through the space to the wider countryside, that give it significance and determine the extent to which it is important to the setting of the conservation area and/or other heritage designations. It is agreed that the broad character of the landscape surrounding Cottesbrooke as described in the respondent's comments should be considered if any development proposals arise in the future, but it is also important that the specific features within a space, which give it its special character, are clearly defined in the conservation area appraisal. Open space analysis fulfils this requirement and it is in line with the methodology that has been used when appraising other conservation areas in the Daventry area. Further work will be undertaken to provide photographic evidence relating to the significance of individual open spaces around the edges of the conservation area, especially in</p>	<p>Section 7.7, p. 59, first paragraph, second sentence, amend the text to read:</p> <p>"These particular open spaces, identified in Figure 51, lie immediately adjacent to the conservation area boundary but their attributes generally extend further into other areas of the open countryside. <u>Views of the landscape beyond these areas are not always visible due to tree cover or the natural topography. Open spaces 25-32 are illustrated by photographs below.</u>"</p> <p>Section 7.7, p. 61, subheading 'OS7: Area of pasture south of All Saints Church, amend the text to read:</p> <p>"There are views from the churchyard south to this area of open land and also towards OS9 which contribute to the rural, peaceful atmosphere of the churchyard. <u>The gently rising slope and the line of trees terminate the views at The Green Lane, which runs</u></p>
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		<p>terms of the extent to which they enable views out to the wider countryside.</p>	<p><u>east to west along the top of the slope..."</u></p> <p>Figure 51, p.68, extend the area of OS9 south up to the boundary with The Green Lane.</p> <p>Section 7.7, p.62, subheading 'OS12: An area of pasture that is immediately north of Court End, Main Street', amend text to read:</p> <p>"The trees and open space behind them contribute to the peaceful, rural character of the conservation area. There are views of the tree avenue, monument and the ridge and furrow from Main Street <u>as well as glimpses of the rural landscape beyond through breaks in the trees</u> (Section 7.6, V32).</p> <p>Section 7.7, p. 62, subheading 'OS13: Several irregularly-shaped enclosures between the gated road and the Welford Road, west of Cottesbrooke', amend the text to read:</p> <p>"There are several spinneys which are remnants of those depicted on the 1839 Tithe Map, as are many of the hedged field boundaries, indicating that features within this tract of landscape date back to at</p>
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			<p>least the early 19th century, and probably earlier. <u>The rising topography and tree cover prevent longer views of the surrounding rural landscape beyond the Welford Road.</u></p> <p>Section 7.7, p. 63, subheading 'OS14: Two areas of pasture on the northeast side of Welford Road', add the following text at the end of the paragraph:</p> <p><u>"Similarly to OS13, The rising topography and tree cover prevent longer views of the surrounding countryside beyond Welford Road."</u></p> <p>Section 7.7, p. 63, subheading 'OS15: Two areas of pasture south of the gated road', add the following text to the penultimate sentence:</p> <p>"This area contributes to the peaceful and rural character of the landscape surrounding the conservation area <u>and enables views to the wider countryside..."</u></p> <p>Section 7.7, p.63, subheading 'OS16: An area of pasture north of the gated road and east of Calendar Farm', add the following text at the end of the paragraph:</p>
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			<p><u>"The open character of this land enables long views to the north and northeast."</u></p> <p>Section 7.7, p.66, subheading 'OS22: Small arable enclosure on west side of byway', amend the text to read:</p> <p>"...The openness of this parcel of land enables views back towards the conservation area and in particular across parkland to an avenue of trees (see Section 7.6, V27 as well as <u>northwest towards Homeground Spinney</u>.</p> <p>Insert photograph with the following caption: <u>"Figure 50 of views across OS22 towards the parkland"</u></p> <p>Section 7.7, p.66, subheading 'OS23: An area of pasture at the southeast corner of the conservation area', add the following text at the end of the paragraph:</p> <p><u>"The land slopes gently upwards towards a belt of trees where views terminate."</u></p> <p>Section 7.7, p. 67, subheading 'OS24: Mitley Spinney and</p>
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			<p>Homeground Spinney', amend the text to the following:</p> <p>An Three areas of woodland that makes a significant contribution to the character and setting of the conservation area. Formerly three separate spinneys, one unnamed, and Mitley Spinney and Homeground Spinney, tree cover has subsequently increased, forming a single wooded area... The spinneys itself is <u>form</u> a prominent feature in the landscape. Situated on elevated ground at a height of 155m OD it is <u>they are</u> visible in views looking north from Cottesbrooke Hall (Section 7.6, V15). <u>The rising topography and tree cover close off views to the wider countryside in this direction.</u> The three spinneys are also prominent in views as well as on the approach to the conservation area along the lane from Haselbech (Section 7.6, V29). <u>They are</u> It is a feature of the 19th century park.</p> <p>Insert photograph with the following caption:</p> <p><u>"Figure 51: OS24, the spinneys as viewed from the lane to Haselbech"</u></p>
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			<p>Section 7.7, p. 67, insert photograph with the caption: <u>“Figure 52: OS25, views across OS4 towards OS25. The rising topography prevents longer views to the rural landscape beyond.”</u></p> <p>Section 7.7, p. 68, insert photograph with the caption: <u>“Figure 53: OS 26, an area of pasture to the rear of Home Farm which enhances the peaceful, rural character of the conservation area. The rising topography prevents longer views of the landscape to the southwest”.</u></p> <p>Section 7.7, p. 68, insert photograph with the caption: <u>“Figure 54: OS27, an area of pasture that contributes to the rural character and setting of the conservation area as it is approached along the gated road. The land rises gently to the south, thus obscuring views to the distant countryside.”</u></p> <p>Section 7.7, p. 68, insert photograph with the caption: <u>“Figure 55: OS28, an agricultural field that contributes to the rural character of the conservation area and its surrounding landscape.”</u></p>
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			<p>Section 7.7, p. 68, insert photograph with the caption: <u>“Figure 56: OS29, agricultural land that enables long views out of the conservation area from the gated road to Guilsborough to the open countryside”.</u></p> <p>Section 7.7, p. 69, insert photograph with the caption: <u>“Figure 57: OS30, an area of pasture that contributes to the rural character of the conservation area. The flatter topography of this enclosure and the countryside beyond, coupled with tree cover around its edges, prevent long views of the wider rural landscape.”</u></p> <p>Section 7.7, p. 69, insert photograph with the caption: <u>“Figure 58: OS31, An area of both arable and pasture that wraps around the north end of the conservation area, enabling views Mitley Spinney and Homeground Spinney. The rising topography and the tree cover prevent views of the countryside to the north of the conservation area.”</u></p> <p>Section 7.7, p. 69, insert photograph with the caption: <u>“Figure 59: OS32, an area of arable land that enables views from the</u></p>
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	<p><i>7.8 Public Realm and Other Features of Value</i></p> <p>The value of the features identified within this section is not disputed. Indeed, the Estate fought to keep the painted timber way marker posts when the local authority previously sought to replace them with aluminium signposts.</p> <p><i>8.1 Building Types and Materials</i></p> <p>The architecture of Cottesbrooke has a strong vernacular character. Again, many of the features identified in the appraisal have been cherished and managed by the Estate for decades. Indeed, the 'timber, shallow pitched, canopy porches' highlighted on page 72 of the report were added by the Estate in the 1970s and 1980s. However, there is a balance to strike between maintaining the architectural</p>	<p>7.8 Comments noted.</p> <p>8.1 Comments noted. Proposals will be assessed on a case-by-case basis. The additional protections that exist within the conservation area will assist in making those decisions. Information about improving energy efficiency in historic buildings been produced by Historic England in two guidance notes; Energy Efficiency and Traditional Homes Historic England (2020) and Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency Historic England (2018).</p>	<p>byway towards Homeground Spinney".</p> <p>Section 7.7, p. 69, insert photograph with the caption: <u>"Figure 60: OS32, an area of agricultural land that rises gently to the east and northeast towards a tree-covered ridge, which obscures longer views of the surrounding countryside."</u></p> <p>No change.</p> <p>No change.</p>
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	<p>characteristics of individual buildings and enabling the buildings to have a sustainable future. For example, the Government requires let properties to meet minimum energy efficiency standards. Such standards are difficult to achieve for more traditionally constructed properties with features such as single glazed windows. The Estate is legally required to meet these standards and as such there needs to be flexibility and an appreciation that not all architectural features will be able to be maintained in perpetuity.</p> <p><i>8.3 Boundary Treatments</i> Hedges make an important contribution to the conservation area demarking property boundaries and recording enclosure. The estate is aware of its duties under the 1997 Hedgerow Regulations and actively manages such boundaries through replanting, gapping up and cyclical trimming. The Estate will manage over 83km of hedges in accordance with the new Countryside Stewardship agreement which it entered into with the RPA with effect from 1 January 2021. In addition, the Estate will lay over 2,000m of hedge and coppice a further 865m under this agreement.</p>	Comments noted.	No change.
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	<p>11. Management Plan</p> <p>This section presents a helpful summary of matters which are already addressed by the ITE Agreement, PMP and other designatory requirements. The estate is mindful of these matters when proposing any development within its own holdings, specifically within the conservation area, or when commenting on applications made by neighbours.</p> <p>Proposed boundary changes to the conservation area</p> <p>The proposed boundary changes are illustrated by Figure 4 in the draft document and include the following areas:</p> <ul style="list-style-type: none"> • Earthworks – an area of settlement and ridge and furrow (BA1) • Earthworks – an area of settlement (BA2) • The west half of a spinney north of the gated road towards Guilsborough (BA3) • Mitley and Homeground spinneys (BA4), and, • Western spinney (BA5). <p>Section 10.4 sets out the rational for these boundary amendments.</p>	<p>Comments welcomed.</p> <p>Agreed. See below for response to comments about specific boundary changes.</p>	<p>No change.</p> <p>No change.</p>
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	<p>Taking each in turn, we offer the following observations:</p> <ul style="list-style-type: none"> • BA1: This land lies to the south of Station Road and south west of the un-named river which flows through the park to discharge into the River Nene. <p>The rational for including this land is to better preserve archaeology. This is considered a reasonable intention from the landscape perspective and corresponds with the estate's wish to retain this area under permanent pasture which also contributes to the setting of the village;</p> <ul style="list-style-type: none"> • BA2 – land to the south of Station Road and east of 1 and 2 cottages which are part of the ITE agreement. The rational for including this area of paddock is to better preserve archaeology. <p>This is considered a reasonable intention from a landscape perspective and corresponds with the estate's wish to retain this area under permanent pasture which also contributes to the setting of the village, specifically 1 and 2;</p>	<p>Comments welcomed.</p>	<p>No change.</p>
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	<ul style="list-style-type: none"> • BA3 concerns the west side of a spinney on the west edge of the registered park. This historic spinney has been expanded since 1900 and the rational for its inclusion within the conservation area is 'for completeness' (10.4.3 refers). <p>The western area is not, however, an historic woodland. It lies beyond an internal ditch which marks the boundary of the park. It does not appear on the tithe map. For this reason, it is excluded from the registered park and existing conservation area. Its inclusion risks confusing the understanding of the relative significance of the east and west areas of this woodland and an understanding and appreciation of the established boundary of the registered park. This woodland is already subject to a live EWGS as part of the WMP and subject to agreed thinning/felling cycles. The PMP has also assessed this spinney and recommended a refinement to the WMP: targeted felling of Scots pine along the inner east boundary. The clear segregation of the west and east spinney is therefore important. The further layer of designation risks eroding the understanding of, specifically, the registered park. It is also unnecessary</p>	<p>Paragraph 10.4.3 also mentions that the spinney contributes to the verdant character of the parkland.</p> <p>Whereas the Registered Park and Garden (RPG) boundary was drawn to incorporate the historic park, therefore creating a snapshot in time of the 18th landscape, features that are included in conservation areas do not necessarily have to be 'historic' if they contribute in other ways. As such, there is no presumption that the boundary of the conservation area should be aligned exactly with that of the RPG. In fact, much of the southern boundary of the conservation area deviates from the RPG boundary because it incorporates the village. Paragraph 10.4.3 mentions that the spinney as a whole contributes to the verdant character of the landscape. It is a prominent feature in the unenclosed landscape as the conservation area is approached along the lane from the west and adds to its amenity value. The boundary of the RPG is shown clearly in the appraisal at Figure 2 and is available online on the National Heritage List for England along with its list description. With the information about the RPG designation being in the public domain and accessible</p>	<p>Section 6, p.34, Figure 28, amend the map so that the west half of the spinney is not shown as an historic area of woodland.</p> <p>No change.</p>
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	<p>from a management perspective given the existing management requirements associated with the various agreements and undertakings.</p> <ul style="list-style-type: none"> • BA4 includes parts of Mitley and Homeground spinneys. These woodlands are not included in the registered park for the same reasons as the west area of spinney above. Although partly historic plantings, these woodlands had evidently lost sufficient character and intactness by 1998 not to be included within the designation boundary. C. 1900, the Ordnance Survey recorded parkland between them had already been planted up and in their coalescence the woodlands extended northeast outside the park to include Homeground. 	<p>online, there should be no reason why its understanding should be eroded.</p> <p>The west part of the spinney mentioned above (BA3) was planted in the late 20th century whereas the 1839 Tithe Map shows that Mitley and Homeground spinneys existed by this date. By the time of the 1885 Ordnance Survey map the woodlands resembled those which exist today in terms of their extent, although there have subsequently been some smaller additions. Therefore, the greater extent of these woodlands have been a feature in the landscape since the 19th century and they contribute to its historic interest. As set out in Section 10.4.4 of the appraisal a building known as Moss Hall Lodge is depicted on the 1839 Tithe Map and remains of the building still survive in the middle spinney, adding to its historic and archaeological interest. The woodland is a prominent feature in the landscape and has been identified as such in the appraisal particularly in relation to important views (Section 7.6 Views 15 and 29). The respondent's comments above in relation to Section 7.6 of the appraisal acknowledge that View 15 corresponds with a view that is identified in the estate's Park Management Plan (PMP).</p>	<p>No change.</p>
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	<p>As with BA3, the inclusion of the area within the conservation area risks confusion in an understanding of the registered landscape and of the relative significance between different areas within it. These woodlands are also subject to a live EWGS as part of the WMP, with consented thinning and felling operations. The introduction of a further layer of designation is therefore unnecessary and potentially confusing.</p> <p>Note: it is not unusual to have woodland outriders (coverts, plantations or clumps) beyond a park boundary but within an estate landscape. This is particularly common in hunting landscapes as found across Northamptonshire and Leicestershire.</p> <p>It is worth mentioning that the officers' statement in the draft appraisal on page 100 that this wooded area "was formed by three spinneys but since then tree cover has increased, forming a single wooded area" is incorrect. There remain three spinneys. Other evidence offered by the officers also seems somewhat uncertain. Indeed the restoration and reinstatement to parkland of the two fields running up to these woods from</p>	<p>As mentioned above in response to comments about BA3, there is no presumption that the boundary of the conservation area should follow the exact line of the Registered Park and Garden. The EWGS and WMP are in operation elsewhere within the current conservation area boundary to manage the woodlands. The conservation area status does not override the EWGS or WMP. This would also be the case if the woodlands within BA4 were included in the conservation area.</p> <p>Agreed. The respondent's comment further demonstrate the significance of the woodlands in BA4 to the historic character of the parkland landscape and the wider estate and the contribution they make to its setting.</p> <p>Thank you for drawing attention to this inaccuracy. Should the appraisal be adopted by the council as a supplementary planning document, changes will be made to it to recognise that it is in its final form. This will include omitting Section 10.4 – Proposed Boundary Amendments from the document.</p>	<p>No change.</p> <p>Delete Section 10.4 – Proposed Boundary Amendments p.100-102 from the final version of the document, if adopted.</p>
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	<p>the Hall were a key consideration for Natural England, and The Landscape Agency when developing and informing the Parkland Management Plan. At no point did the spinneys ever form part of the discussions.</p> <ul style="list-style-type: none"> • BA5 concerns a pair of small boundary woodlands bisected by a stream ditch in the southeast of the registered park. Only the western part of these woodlands is within the registered park, the eastern part lies within farmland. <p>This is clearly recorded by the Ordnance Survey c. 1886 and c. 1900 and is why they were not included within the designation boundary. It is incorrect to describe them 'as a feature of the historic parkland'. The extension of the conservation area to include the eastern parts of the woodland will, again, risk a misunderstanding of their relationship to the historic woodlands within the park. These woodlands are also subject to live EWGS as part of the WMP and subject to consented planting and thinning. The PMP recommends the removal of Leyland cypress with the east woodlands. The introduction of a further layer of designation is therefore unnecessary and potentially confusing.</p>	<p>Although it is acknowledged that the eastern parts may not be within the registered park boundary, the pair of woodlands is depicted on the 1839 Tithe Map, making them a feature of the historic landscape.</p> <p>Based on the evidence of historic mapping, it is incorrect to say that the eastern parts of the spinneys lay within farmland. On the 1839 Tithe map and the 1885 and 1900 Ordnance Survey maps, individual parcels of land have a number to identify them and the Ordnance Survey maps also record the acreages of individual parcels. In the case of all three historic maps each spinney has a single number and acreage assigned to it, suggesting that each was regarded as a single land parcel. Furthermore, where a feature, such as a watercourse, runs through a land parcel the Ordnance Survey used a brace symbol, an elongated 'S', drawn across the feature to show that it did not divide the land into separate parcels. This convention is clearly shown in both spinneys on the 1885 and 1900</p>	<p>No change.</p>
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	<p>Conclusion</p> <p>Cottesbrooke is a highly designated historic environment composed of a conservation area, listed buildings, a registered park and garden and undesignated heritage assets which lies within an SLA.</p> <p>Ordnance Survey maps, linking the areas of woodland either side of the watercourse. This also shows that they were considered as single parcels of land rather than the areas east of the watercourse being regarded as separate areas of farmland or part of the byway.</p> <p>Whilst their effective management through the EWGS and WMP is not disputed, bringing the east half of the spinneys into the conservation area would reinforce their importance from a historic landscape perspective.</p> <p>They also assist in screening several large agricultural buildings that stand at the very edge of the current conservation area and registered park and garden designations and contribute to the visual amenity of the conservation area as it is entered along Station Road. Please refer to previous comments above regarding the operation of EWGS and the WMP within the conservation area.</p> <p>Please refer to previous comments regarding the reasons for the proposed extensions.</p>	No change.
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	<p>These designations inform complementary agreements and undertakings which allow the estate to continue to operate as a viable working business. The commitment of the Macdonald-Buchanan's to Cottesbrooke is evidenced by the number of these agreements – ITE, Countryside Stewardship, WMP – they have entered into and each is governed by its own requirements and monitoring arrangements.</p> <p>Cottesbrooke is in safe hands, the estate 'manage change in a manner sensitive to the character and appearance of the conservation area' (3.1).</p> <p>The wish to extend the conservation area boundary as described risks duplicating management responsibilities and thereby actually introducing potential risk to the very assets the designations are intended to conserve, notably the understanding of the registered park within the wider estate landscape. The benefit of extending the conservation area boundary is therefore considered to be low. No benefit will be brought to the registered park itself. Land beyond the park boundary can be considered part of the setting of the designated and undesignated heritage assets.</p> <p>This measure of protection already extends beyond the existing</p>		
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	<p>boundaries and, again, the merit of extending the conservation area is therefore questioned. The existing boundary is' fit for purpose'.</p>		
Mike Roberts, for and on behalf of Trustees of the Hospital of John Langham	<p>I write to you as trustee of the Hospital of John Langham regarding the appraisal of the Cottesbrooke Conservation Area. This has been reviewed by the Planning Officers of West Northants, and appears balanced and well researched.</p> <p>However, my comments are as follows:</p> <ul style="list-style-type: none"> • The Conservation Area is already very large. The arguments against such a large area are by and large identical to those put forward in 2000, when the Planning Officers recommended a much smaller, "tighter" conservation area, but were over-ruled by the Planning Committee who insisted that Cottesbrooke Hall should be included. • An extension of the Conservation Area and tightening of controls will make it harder for the buildings and landscape to continue to be used in a sustainable way. 	<p>Comments noted.</p> <p>The character of Cottesbrooke village is that of an estate village, whose development has been heavily influenced over the years by Cottesbrooke Hall. As such, the inclusion of the hall is paramount to the understanding of the village's history. The designation in 2000 of the hall, its park and gardens and the village as a single conservation area is commensurate with the approach taken to other estate villages elsewhere in West Northamptonshire.</p> <p>This current review will not change or add to the types of controls that have been in place since 2000, when the conservation area was first designated. The areas of woodland that are proposed to be included</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

	<ul style="list-style-type: none"> Article 4 Directions will put additional complexities and cost into straight forward activities such as repainting houses and replacing old windows. 	<p>in the conservation area are managed through a Woodland Management Plan and English Woodland Grant Scheme, monitored by the Forestry Commission. Conservation area status would not impact the management of these wooded areas.</p> <p>The proposed Article 4(1) Direction would remove some permitted development rights for particular properties. These are set out on p. 98 of the appraisal. Whilst particular types of development would require planning permission, which would incur the cost of a householder application, the types of development for which permitted development rights would be removed are those which are carried out on an occasional basis. In some circumstances planning permission may not be required if the development involved is like-for-like replacement but this would need to be checked with the council's planning team. If the conservation area appraisal was adopted this would not bring the Article 4(1) Direction into force. It would be subject to a separate consultation at which time property owners would be contacted directly.</p> <p>There is no presumption that the conservation area boundary should follow the exact boundary of the Registered Park and Garden (RPG), especially where there are features that contribute to its historic</p>	No change.
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	<p>what is historic and what is recent (last 50 years).</p> <ul style="list-style-type: none"> The Cottesbrooke Estate, at its own cost, maintains much of the amenity of the village. Who is going to maintain the items on the Local List which belong to the community i.e. the Telephone Kiosk and what are the implications if the care of these assets is not sustainable. 	<p>character, visual amenity and/or setting. In fact, the conservation area boundary has never solely followed that of the RPG, and was drawn to include the village to the south when it was first designated in 2000. Although the west half of the woodland that is identified in the appraisal as BA3 was planted in the 1990s, it makes a positive contribution to the character of this part of the conservation area, being a landscape of numerous spinneys and woodlands. BA1 and 2, as well as BA4 and 5, contribute in the same way but are also of historic interest. They are features of the historic landscape as evidenced by remaining archaeological earthworks in the case of BA1 and 2 and historic mapping evidence from the 1839 Tithe Map in the case of BA4 and 5.</p> <p>Local list status does not confer any additional planning controls but it does recognise buildings or structures as locally important and they are given protection through policy if any proposed development is going to affect them. In terms of maintenance, local list status does not put any extra obligation on the custodian or owner to maintain the structure. If the estate was no longer able to fund that, it would be down to the community to fund it in its role as the custodian. If it was to fall into disrepair it would not be in the council's powers to take any enforcement action. The council</p>	<p>No change.</p>
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	<ul style="list-style-type: none"> On the whole the village's character has been established over years of careful management by the custodians at the time and without the extra layers of control enforced by the Local Authority. By adding more bureaucracy, it may start to tip the balance of retaining historic features and securing the long term sustainability of the village assets. 	<p>would rather work with the community to try and find a solution. The council does offer community funding grants so that is a potential source of funding, especially if the kiosk is providing some sort of community facility, for example, a book exchange, if it is no longer a functioning telephone kiosk.</p> <p>Whilst conservation area status introduces the need for planning permission for particular types of development, its designation was not a response to a perceived threat but rather recognition that it is a place of special historic and architectural character that merits conservation area status. It is acknowledged that the Cottesbrooke Estate is managed well by the owners. The proposed extensions to the conservation area are pasture or woodland. The areas of woodland are managed through a Woodland Management Plan and English Woodland Grant Scheme entered into by the Estate with the Forestry Commission. Conservation area status would not affect these existing agreements. The planning controls throughout the remainder of the conservation area would be the same as those which have been in operation since 2000 under which it has been successfully managed by the Estate working with the local planning authority.</p>	No change.
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Eric and Joyce Wright	<p>I am writing to ask why it is necessary to extend the conservation area as you propose. Is there not adequate area (520 acres) to protect the village and its environs?</p> <p>Much of what is proposed I support – such as removing electricity poles, burying cables, minimizing street clutter and no street lights. However, I feel the positives are weakened by this unnecessary step to extend the boundary of the conservation area wider.</p>	<p>Thank you for your response. Please see comments from the Cottesbrooke Estate and the officer response to the same question above, under the heading 'Proposed boundary changes to the conservation area'.</p>	No further change.
Peter Messenger	<p>I have felt the need to write to you about the Conservation Area Review. I was born in Cottesbrooke and I worked at Cottesbrooke for over 50 years and have been retired for some 10 years. Cottesbrooke's unique character is that it has no street clutter and has been managed as a traditional estate village. This gives it its unique feel. As a result, I welcome the review's conclusion that its rural character must be preserved.</p> <p>I cannot understand however that extending the conservation area adds to what already is in place – it may not. Views from the village are long and the areas in question cannot be seen from the village.</p>	<p>Comments noted.</p> <p>The proposed five extensions to the conservation area acknowledge the contribution that these areas make to its historic, rural character and/or its setting. The reasons for their proposed inclusion is set out in Section 10.4 of the appraisal. BA1 and 2 are to the south of Station Road and can be seen from the road.</p>	<p>No change.</p> <p>No change.</p>

		Whilst the other three areas are not visible from the village they can be seen from within and on the approaches to the conservation area. BA3 is visible from the gated road to Guilsborough; BA4 is visible from the lane to Haselbech, from various locations within the parkland, and the byway that runs north from Station Road; and BA5 is visible from Station Road and the byway.	
Carol Bozier	<p>I have lived and worked in Cottesbrooke for over 40 years. The Estate is very largely responsible for ensuring the village has retained its rural charm. It has not been managed by public servants. As a result, I believe the Conservation Area should not be changed. A review is a review and nothing need change as a result.</p> <p>I do not drive and would like West Northants to consider some public transport, rather than worry about things the Estate is already managing well.</p>	<p>Thank you for your comments. Please see the response to comments made on behalf of the Trustees of the Hospital of John Langham above (final bullet point) which raise the same point.</p> <p>Where there are currently no bus services some areas have a community transport scheme operating. More information about these schemes can be found on the council's website www.northamptonshire.gov.uk/councilservices/northamptonshire-highways/buses/Pages/community-transport.aspx</p>	<p>No change.</p> <p>No change.</p>
Susan Cazenove	My husband, as chairman of the Parish Meeting, was very involved in the original designation of Cottesbrooke Conservation Area in 2000. I can recall he was adamant	Thank you for your response. Please see comments above from the Cottesbrooke Estate under the heading 'Proposed boundary changes to the conservation area' and the officer response, which	No change.

	<p>that the conservation area should be drawn tight against the village curtilage and argued very vociferously against the extension of the area to the Register of Parks and Gardens boundary. Therefore, I cannot support any extension of this boundary, which seems very heavy handed and unnecessary when Cottesbrooke Estate has managed the wider landscape very well.</p> <p>It would benefit the village greatly if the telegraph poles were removed and the power buried. Part of its charm is the lack of street clutter with no street lights and this would be the cherry on the top. I am glad that the Officials recognise the rural nature of the village and wish to minimise street clutter including street lights.</p>	<p>explains the reasons for the proposed extensions.</p> <p>Comments noted. These positive features and public realm enhancements are set out in Sections 7.8 and 10.3 of the appraisal respectively.</p>	No change.
Mike Roberts	<p>I live in the Old Post Office and am not a tenant of the Estate. Cottesbrooke is a very unusual village and I am very proud to live in it. However, its special characteristics have not come about accidentally but because of the careful stewarding of the Estate through three owners. Over complicating this by expanding the area of the conservation, adding Article 4 Directions, adding constraints to the management of the Estate, could be counterproductive.</p>	<p>It is agreed that the Cottesbrooke Estate has been well managed and looked after over the years. This includes working with the local planning authority to ensure the requirements of local and national policies and legislation are met. As mentioned previously, the proposed extensions to the conservation area are pasture or woodland. The areas of woodland are managed through a Woodland Management Plan and English Woodland Grant Scheme entered into by the estate and overseen by the Forestry Commission. Conservation area status</p>	No change.

	<p>Features such as the telephone kiosk, the post box, the lack of street lights together with street clutter, grass verges and hedgerow boundaries, all add to the character and charm of the village. The Officers have correctly identified them as worth preserving. I do however remain concerned that villages such as Cottesbrooke must not become "museum exhibits" and must be allowed to change and develop in a sustainable way.</p>	<p>would not affect these existing agreements. The planning controls throughout the remainder of the conservation area would be the same as those which have been in operation since 2000 under which it has been successfully managed by the estate working with the local planning authority. The exception to this would be those permitted development rights that would be removed by an Article 4(1) Direction, as detailed in Section 10.2 of the appraisal but this would be subject to a separate consultation.</p> <p>Agreed. Rather than halting development, the purpose of the conservation area is to ensure that changes are managed in such a way that the special historic and architectural interest of the area is maintained and enhanced.</p>	<p>No change.</p>
Brian Davies	<p>I have lived in Cottesbrooke for over 40 years and have worked at the Estate as a Forester all that time. During that time, I have worked every inch of the woods at Cottesbrooke and planted many thousands of trees. They are in safe hands. I believe the proposed extension to the boundary</p>	<p>Thank you for your comments. As the respondent rightly mentions, a Woodland Management Plan is in operation for the Cottesbrooke Estate. Should the proposed extensions to the conservation area boundary be adopted, thereby bringing further areas of woodland into the conservation area, their management</p>	<p>No change.</p>

	<p>of the Conservation area is unnecessary and adds further complications and cost to the management.</p> <p>All woodland is managed under a Woodland Management Plan and overseen by the Forestry Commission. The Estate employs professional woodland advice in Lockhart Garrett.</p>	<p>would continue in the same way under the Woodland Management Plan.</p> <p>By including them in the conservation area their importance to the visual amenity of the area and their contribution to the interest of the historic landscape would be reinforced.</p>	No change.
Mark and Debbie Harris	<p>My family have lived and farmed in Cottesbrooke for well over 100 years. We have read the Conservation Area Appraisal.</p> <p>We do not agree with the extension to the boundary of what is already a very extensive area. We believe that as landowners and farmers the constraints that the conservation area imposes – in this case on the Cottesbrooke Estate – are unjustified, when the estate has nothing but the good of the landscape and village at its heart.</p> <p>We do however support the officers decision to preserve the rural character by minimizing street clutter. We also support the proposal to add the post box and phone box to the local list.</p>	<p>Thank you for your response. Comments noted.</p> <p>Please see comments from the Cottesbrooke Estate and the officer response which explains the reasoning for including the proposed extensions, under the heading 'Proposed boundary changes to the conservation area'.</p> <p>Comments noted.</p>	<p>No change.</p> <p>No further change.</p> <p>No change.</p>

	<p>As property owners we are concerned by the constraints imposed by Article 4 Directions, in particular the alteration or replacement of windows and doors, and the painting of exterior walls. We do not believe these are necessary in a village that is already a conservation area.</p>	<p>The withdrawal of particular permitted development rights conferred through conservation area status or an Article 4(1) Direction is aimed at steering development so that it preserves and enhances the historic character and distinctiveness of the village. Requiring planning permission for these particular changes will ensure that property owners receive advice about appropriate design, use of materials etc. In consultation with the planning team, if like-for-like replacement is proposed, planning permission may not be required. Conservation area status does not impose a requirement for planning permission for changes to windows. However, should an Article 4(1) Direction be made and confirmed by the council this would bring in some additional controls and these are set out in Section 10.2 of the Appraisal and Management Plan. A separate consultation would be carried out directly with the owners of those properties included in the Article 4(1) Direction.</p>	<p>No change.</p>
	<p>Whilst the officers requirements primarily affect Cottesbrooke Estate, we would wish to remind officers that the village of Cottesbrooke is a working, rural village and must be allowed to continue to be so.</p>	<p>It is recognized that Cottesbrooke is working, rural village and estate and that this is integral to its character. As mentioned previously, the purpose of the conservation area is not to prevent development from taking place but to ensure that development is undertaken in such a way that it preserves and enhances the village and estate's historic character and distinctiveness.</p>	<p>No change.</p>

Sheran Macdonald-Buchanan	<p>I acknowledge that the Local Planning Authority are legally required to review the Conservation Area.</p> <p>I cannot really comment on the proposed extension to the Conservation area on landscape grounds, however, I remain concerned that the extra layers of constraint, recommended by the Planning Officers, overlayed on many existing layers of specialist designations, would appear heavy handed, unnecessary and potentially costly.</p> <p>For Cottesbrooke to survive in the future, it should be able to grow and thrive with a regulatory environment that encourages sustainable development. I am concerned that too much control from the Local</p>	<p>Comments noted.</p> <p>In addition to the conservation area, other designations that exist within the Cottesbrooke Estate are listed buildings, for which listed building consent is required for most types of works, and the registered park and garden. In the case of the latter, other than being a material consideration when planning applications are determined, it confers no additional planning controls. Agreements, rather than designations, between the Estate and the Forestry Commission for the management of woodlands are in place for the proposed extensions BA3, 4 and 5. The conservation area status would not override these agreements or affect the way in which the woodlands are currently being managed or result in any additional costs. Conservation area status for the areas covered by the proposed extensions would, however, acknowledge the positive contribution they make to its historic and rural character and setting.</p> <p>It is not the purpose of conservation area status to prevent development. Instead, it helps to ensure that if changes are proposed they are managed in such a way that the special character of the</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

	<p>Government will suppress the growth of the village in a sustainable way. Cottesbrooke will become a curious relic with no hope for the future. Perhaps it already is.</p> <p>I believe this is a real danger. For instance, Article 4 Directions could put the wish to meet Government net zero targets in direct conflict with West Northants Planning Officers.</p>	<p>conservation area is conserved and enhanced.</p> <p>Planning applications are considered on a case-by-case basis taking into account the local and national policies on sustainable development and energy efficiency. It should be remembered that embodied carbon needs to be considered in development proposals, including those which are incorporated in the proposed Article 4(1) Direction. For example, the replacement of timber window frames with uPVC window frames is not necessarily going to help to achieve net zero targets if the embodied carbon of the uPVC frames (carbon emitted through the extraction and transport of raw materials and the manufacturing process) is greater than the energy efficiency of the windows. In addition, rather than focusing on the replacement of windows to improve energy efficiency, a 'whole building' approach should be followed. This considers the way in which a building performs as an integrated environmental system and determines what is appropriate in terms of energy efficiency measures. This is particularly important for historic buildings where some energy efficiency measures may lead to unintended consequences such as the</p>	<p>No change.</p>
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	<p>The inclusions of assets in the local list is in principle a worthy aim but do these really warrant the enhanced status the local list provides?</p> <p>The Estate plants many trees (1000s of trees in fact) each and every year. It has a biomass boiler to help heat the Hall and several other village properties. This not only helps manage the woodland resource, it also helps with the Estate's carbon footprint. The trees grow locally, are harvested locally, are chipped locally and provide heat locally. This virtuous circle could well suffer if further woodland is included in the Conservation area. I cannot therefore support the proposed extension to the Conservation area, which proposes to include 3 more areas of woodland that are already included in the Woodland Management Plan under the watchful eye of the Forestry Commission.</p>	<p>build-up of moisture. Historic England has produced several guidance documents on energy efficiency and heritage assets <u>Energy Efficiency and Historic Buildings Historic England</u></p> <p>The heritage assets proposed to be added to the Local List are assessed against a set of criteria adopted by the council that look at age; condition and quality; rarity; group value; and historic associations. The Local List candidates in Cottesbrooke were assessed against the criteria were found to meet the threshold for inclusion on the list.</p> <p>Conservation area status does not confer any controls over the planting of trees. As mentioned previously, bringing the three additional areas of woodland (referenced in the appraisal as BA3, 4 and 5) into the conservation area would not affect the functioning of the management agreement that is already in place with the Forestry Commission. Nor would it impact upon the ability of the Estate to use the woodlands to fuel the biomass boiler.</p>	<p>No change.</p> <p>No change.</p>
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Mrs J.R. Macdonald- Buchanan	<p>I have read the appraisal from West Northants and would like to say I thought it was excellent.</p> <p>I was involved in the original consultation in 2000 and I recall the issues regarding extending the conservation area to mirror the Registered Parks and Gardens boundary. I see the plan is to extend this further. The conservation area as is seems to me to be big enough to preserve intact the feel and attractiveness of the village. As a result I cannot agree to any boundary changes which will increase this.</p> <p>I would add that I am encouraged by the Officers' wish to maintain the rural nature of the village by encouraging the removal of telegraph poles and overhead wires and discouraging any street clutter and street lamps. The lack of street clutter is one of the village's attractions!</p> <p>I live adjacent to the telephone box and feel it is an important feature which would be good to add to the local list.</p> <p>Any further restrictions imposed on the residents of the village appear unnecessary. Cottesbrooke Estate has done a good job of managing the</p>	<p>Comment welcomed.</p> <p>Please see above comments from the Cottesbrooke Estate and the officer response which explains the reasoning for including the proposed extensions, under the heading 'Proposed boundary changes to the conservation area'.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>The planning controls within the conservation area remain the same as those which have been in place since it was first designated in 2000. The removal</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>
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	wider estate for 100 years. They should be encouraged to continue to do so, and any further constraints may be counterproductive.	of some additional permitted development rights through an Article 4(1) Direction as set out in Section 10.2 of the appraisal would be subject to a separate consultation at which point the relevant property owners would be contacted directly. The permitted development rights to be removed through the Article 4(1) Direction relate to the types of development that are undertaken periodically and are restricted to domestic dwellings. Whilst it is agreed that the Estate manages Cottesbrooke well, this cannot be guaranteed in the future if there are changes of ownership for individual properties.	
Alistair Macdonald-Buchanan	<p>I have responded already on behalf of the Estate. I write now in my personal capacity.</p> <p>In 2000, the Estate argued against the inclusion of Cottesbrooke Hall and approximately 520 acres of surrounding parkland, woodland, arable and pasture farmland into the new Conservation area, but was supportive of a more practical and logical conservation area boundary drawn close to the village curtilage. This “tighter” boundary was rejected by the Planning Committee and the Officers eventually settled on the Register of Parks and Gardens boundary. This was the only logical</p>	<p>Comments noted.</p> <p>The designation of the conservation area in 2000 to include Cottesbrooke Hall, its gardens and parkland as well as the village is considered to be a logical approach. This is due to the fact that development history and appearance of the village owe much to the fact that it is an estate village that has been greatly influenced by Cottesbrooke Hall over a number of centuries. This approach has been used elsewhere in the Daventry area where there are also Registered Park and Garden designations, for example, Ashby St. Ledgers, Canons Ashby and Brockhall.</p>	<p>No change.</p> <p>No change.</p>

	<p>boundary they could agree on. Back then the arguments against this huge conservation area boundary were very similar to those I will use now against any extension from the boundary that mirrors the Register of Parks and Gardens boundary (i.e. the current conservation area).</p> <p>While I still believe the existing Conservation area boundary is too extensive, I must remind you that almost every aspect of what the conservation is hoping to achieve is already well protected through a series of specialist designations and schemes designed to preserve and enhance the special historical and architectural appearance and character of Cottesbrooke. These include listing, ITE and Management Plan, Woodland Management Plan overseen by the Forestry Commission, Countryside Stewardship agreement with RPA and Parkland Management Plan with Natural England (signed off by Historic England and the Environment Agency). All these schemes are agreed on and entered into voluntarily.</p> <p>Furthermore, there are planning constraints. Cottesbrooke is classified as a Restraint Village; a Special</p>	<p>It is agreed that there is a degree of overlap between the various management schemes and statutory designations. With the exception of the Registered Park and Garden, other designations and management schemes are specific to individual buildings or features. Therefore, the strength of the conservation area is the fact that it is an area designation that not only recognises the significance of those individual buildings/features but also the spaces between them and the landscape in which they are situated.</p>	No change.
	<p>Furthermore, there are planning constraints. Cottesbrooke is classified as a Restraint Village; a Special</p>	<p>It is agreed that there is a range of designations and policies that help to protect Cottesbrooke Hall, village and their</p>	No change.

	<p>Landscape Area; there is the Register of Parks and Gardens; an existing Conservation area (these currently mirror each other); and finally open countryside. This comprehensive set of designations and planning policies apply to the wider landscape at Cottesbrooke, Cottesbrooke village and the parkland, woodland and farmland surrounding Cottesbrooke Hall. All are there to protect the historic character and the setting.</p> <p>All the above must be set in context. Cottesbrooke is not a theme park but is a working agricultural enterprise, which includes forestry. Additional restrictions are unhelpful and frustrating. Cottesbrooke must remain viable and sustainable. Extra hoops through which we have to jump will inevitably lead to cost and frustrations on both sides – ours and West Northants – and achieves very little extra protection.</p> <p>I would ask you to reconsider the enlargement of the Conservation area. I have made a detailed case in the submission on behalf of the Estate.</p>	<p>environs, although not all will lend protection specifically to Cottesbrooke's historic environment. The conservation area designation does, however, focus on the historic environment and the accompanying appraisal and management plan provides detail as to the significance of its various elements, including the proposed extensions.</p> <p>Please refer to the response to similar comments made above in the submission on behalf of the Cottesbrooke Estate. Conservation area status will not confer additional specific planning controls in the proposed extensions. However, it will reinforce their importance. In addition, the appraisal and management plan sets out their significance, which would be a material consideration should particular types of development be proposed in the future.</p>	No change.
Claire Marshall	In relation to the above, whilst I'm not a resident of Cottesbrooke, I very much enjoy walking my dog around this area and using footpaths,	Thank you for your response. It is agreed that Cottesbrooke and its surrounding landscape is a very special area.	No change.

	<p>Bridleways and byways, it's a lovely area.</p> <p>Referring to the draft consultation I have an observation concerning what has been suggested with regard to adding the new BA areas in particular BA5. It's not actually listed as one of the objectives under section 3.2 although BA1 to 4 are - not sure whether this was an error? However it is included in section 10.4.</p> <p>The reason stated for including it in the new conservation area is that the two spinneys at this location were included on the 1839 tithe map as being within the original Cottesbrooke hall park boundary. However the extract copy of the 1839 tithe map shown in this document doesn't clearly illustrate this.</p> <p>The area that relates to BA5 is next to the byway at Dairy Beck Farm and this area would appear to actually be situated further to the right of the tithe map illustration. As such the draft documentation doesn't seem to clearly support the reasoning behind</p>	<p>Thank you for pointing out this error. The details for BA5 are included in Section 10.4 but they should also have been included in Section 3.2. If the proposed extensions are adopted by the council some changes will be made to the appraisal document to recognise that it is in its final form. This will include adding the extensions into the description of the conservation area boundary in Section 3.1 and showing them on the map as within the boundary. Sections 3.2 and 10.4 would be removed from the final version of the appraisal.</p> <p>Thank you for your comments. Please see the officer response to the same issue raised by the Cottesbrooke Estate above, in the section 'Proposed boundary changes to the conservation area', 5th bullet point.</p> <p>Comparison between the current OS mapping and historic mapping shows that the route of the byway and the boundaries of the historic spinneys depicted on the 1839 Tithe Map accord with each other. There have been additions to both spinneys, which has increased their extent</p>	<p>Delete Section 3.2 and 10.4 – Proposed Boundary Amendments p.100-102 from the final version of the document, if adopted.</p> <p>No further change.</p> <p>No change.</p>
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	<p>the inclusion of BA5 in the new park boundary.</p> <p>As the current brook/stream along the southern side of the current park boundary, near Dairy Beck Farm, would seem to separate the byway from Cottesbrooke Park, I wonder whether this area has actually always been part of the byway and not historically part of the Cottesbrooke park house grounds? Is there another section of the tithe map that would clarify this?</p>	<p>to the west, however, and this may be where the confusion lies. This aside, the existence of the two spinneys since at least 1839 still points to their being a feature of the historic landscape.</p> <p>The respondent's comments raise the possibility of whether the areas of woodland which, for the purposes of the conservation area review, are labelled BA5, were historically regarded as part of the byway. Historic mapping (the Tithe Map and 1885 and 1900 Ordnance Survey maps) does not support this. On these maps each parcel of land has a number to identify it and the Ordnance Survey maps also record the acreages of the parcels. In the case of all three historic maps each woodland has a single number and acreage assigned to it as a whole, suggesting that each was regarded as a single land parcel. Furthermore, where a feature, such as a watercourse, runs through a land parcel the Ordnance Survey used a brace symbol, an elongated 'S', drawn across the feature to show that it did not divide the land into separate parcels. This convention is clearly shown in both woodlands on the 1885 and 1900 Ordnance Survey maps, linking the areas of woodland either side of the watercourse. This indicates that they were considered as single parcels of land and not part of the byway.</p>	<p>No change.</p>
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	A metalled road only depicts where a road covering has been laid not the whole extent of the width of the original highway or byway in this case.	Roadside 'waste' as it was historically referred to, i.e. the unmetalled parts of the highway or byway, are shaded in pale green on the 1839 Tithe Map. However, the land either side of the metalled byway, east of the two spinneys, is left unshaded, suggesting that historically it was not regarded as part of the byway, but rather as agricultural land. This is also indicated by the use of the brace symbols on the 1885 and 1900 OS maps, which are placed across the byway to link the land either side of it.	No change.
Sandy Bole	<p>I am contacting you in respect of sharing my own personal views regards whether the village should be classified as a Conservation Village?. I have lived very happily in the village for over 3 years now and am still struck at how well managed the village is currently and how it truly stands out as well 'preserved' compared to other local villages. It truly is a gem and has a beautiful aesthetic and any works are carefully undertaken with a mind to how it may affect either villagers or the overall look and functioning of the village.</p> <p>Bearing in mind the unique position of Cottesbrooke, with many properties owned by the Estate, I feel that impossible restrictions as would happen under conservation status is</p>	<p>It is agreed that the village of Cottesbrooke is very attractive and retains much of its historic character. It is acknowledged that this is due in great part to the careful management of the Cottesbrooke Estate.</p> <p>The conservation area and, therefore, the additional planning controls that this confers, has been in existence since 2000 when it was first designated. Since that time the Estate, as the main property</p>	<p>No change.</p> <p>No change.</p>

	<p>undesirable. This because the Estate has ensured and is continuing to do so, and without these restrictions in place, that this village is as lovely as it is.</p> <p>The cost of running the properties will in variable rise and the current smooth running will be impacted. I am sure your own resources are not infinite either and perhaps your resources maybe better focused on another village that could be significantly improved by this classification?. As a resident I am, therefore, not in favour of getting conservation status.</p>	<p>owner, has worked within the conservation area controls to maintain the village, park and gardens to their current standard.</p> <p>As mentioned above, the conservation area status and the additional planning controls have already been in place in Cottesbrooke for the past 21 years. The current review does include proposals for an Article 4 Direction, which would remove permitted development rights for particular types of development, which are detailed in Section 10.2 of the appraisal. These are types of development that are carried out on an occasional basis so the cost of applying for planning permission should not be prohibitive. The proposed Article 4 Direction would be subject to an additional consultation directly with property owners, at a later date.</p>	No change.
Henry Clemons (Cottesbrooke Estate Foreman)	My concern for increasing the boundary of the Conservation area is that it will simply increase the burden and cost on the property and landowners who have created and protected the wonderful areas that the Conservation area reports to protect.	Thank you for your response. As mentioned previously, the proposed extensions to the conservation area should not alter the way in which those areas are currently managed or add to the costs of managing those areas, as conservation area status will not affect the Woodland Management Plan or the English Woodland Grant Scheme, which are already in place.	No change.

	<p>It seems that there is little incentive for future landowners and generations to invest and continue to improve and enhance such areas. It is difficult to see a sustainable future for the countryside without imposing further restrictions on the landowners who are prepared to manage and care for areas of importance like Cottesbrooke.</p> <p>It is in danger of disrespecting the people who currently protect these areas and takes no account of the current Government bodies who protect such areas.</p> <p>We should all be very aware what happens to non-managed woodland and the idea that these amazing, wooded areas will be of any interest if left to their own devices seems ridiculous. The funding put in by landowners over the years seems to be ignored. Woodlands are protected by the Forestry Commission and further regulation seems unjustified. In the consultation meeting it was stated that there is no cost to the extra regulations, possibly there is no fee but is the cost of time</p>	<p>As the respondent will be aware, there are a number of schemes in which the Estate is already engaged that provide incentives for managing both the natural and historic environment of the estate. Conservation area status does not impact on these agreements, and they have been working in tandem since the conservation area was first designated 21 years ago.</p> <p>As has been mentioned previously, it is acknowledged that the Estate manages Cottesbrooke well and clearly seeks to maintain its historic interest. Rather than regarding the conservation area status as a hinderance it should be seen as recognition that the estate is well looked after, to the extent that it merits conservation area status.</p> <p>There are numerous areas of woodland within the existing conservation area that are managed effectively through the Woodland Management Plan and EWGS, overseen by the Forestry Commission. Proposals to bring three further wooded areas into the conservation area should not change the way in which they are managed. Conservation area status does not confer additional regulations over woodlands and it would not mean that they would have to be left unmanaged. The cost in terms of time and/or professional fees will relate to works to individual trees,</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p>and professional fees to landowners not a cost?</p> <p>Woodland work is difficult enough to carry out in a timely manner with weather, nesting birds and current rules how is it beneficial to anyone to make this harder?</p> <p>As it seems the woodland areas have only been increased for good housekeeping would it not be better to remove these areas completely to allow good management to continue at the landowners expense?</p> <p>I fully see the value of adding BA1 & BA2 to the boundary if the aim of the conservation area is to protect areas of interest that may be open to future</p>	<p>rather than woodlands, for which there is a requirement to notify the council of proposed works. This requirement will not apply to the three wooded areas proposed for inclusion in the conservation area and there will not, therefore, result in any additional costs to the landowner in this regard over and above that which has been in place since 2000 when the conservation area was first designated.</p> <p>To reiterate, conservation area status will not affect the way in which woodlands are able to be managed under current agreements with the Forestry Commission.</p> <p>Whilst it is true that one of the reasons BA3 is proposed to be included to avoid any ambiguity about where the boundary of the conservation area lies on the ground, as stated in paragraph 10.4.3, p. 99 of the appraisal it also contributes to the verdant character of the conservation area. BA4 and BA5 are proposed for inclusion for their amenity value, the fact that they are features of the historic landscape which have existed since at least 1839, and their contribution to the setting of the landscape park.</p> <p>Whilst there are several agreements in place to manage various aspects of the park and gardens, they are not necessarily permanent and could be subject to change</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
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	<p>development such as the village of Cottesbrooke. The Hall and Park are Grade 1 listed and in conjunction with other agreements they are never likely to be developed or altered outside the special interests described in the consultation. Again, why not reduce the conservation area to the originally proposed village boundary and concentrate on looking after that.</p> <p>To include items such as the phone box seems nothing but a backwards step as it is only there and of interest to anyone as it has been adopted and maintained by the landowners. How will it be beneficial to future generations if the current situation is altered? Again, it is in danger of disrespecting the work done by such people over the years to protect things that they haven't had to.</p> <p>A real benefit to the area of Cottesbrooke village would be to protect the village streets from signs, speed bumps and streetlights that would completely ruin the character and special feel of the village. Surely being a designated dark area would</p>	<p>at the time of renewal. Although the park is on the list of Registered Parks and Gardens (Grade II) this does not convey any additional protections other than being a material consideration in planning decisions. Usually conservation areas, in whole or part, are de-designated if changes have taken place that mean it is no longer of historic or architectural interest. The current review has not found this to be the case and, therefore, it is not recommended to reduce the size of the conservation area to solely cover Cottesbrooke village.</p> <p>The purpose of local listing is to recognise those buildings and structures that contribute to the historic character of the area. The proposed inclusion of the telephone kiosk on the local list should not be interpreted as a lack of confidence in the custodian's ability to maintain it. In fact, along with its historic interest and the contribution it makes to the street scene, its good condition is also a factor that merits its inclusion on the local list.</p> <p>It is agreed that the low numbers of road signs and a lack of streetlights is a positive feature of the village and this is highlighted in Section 11 – Management Plan of the appraisal under the Highways and the Public Realm sections. Whilst it is agreed that the status of the area as a designated dark sky area may help to maintain the</p>	<p>No change.</p> <p>No change.</p>
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	<p>protect the future of the village far more than an area of woodland?</p> <p>The officers should be aware that only this week the Estate has negotiated with Western Power Distribution to put 250 metres of over head electricity cable under ground in areas of significant importance to the aesthetics of the village and the cost will be borne by the Estate owners. This is along side all the other work undertaken by the Estate to insure the future of the village as it is.</p> <p>As a resident of the village and an employee of the Estate, I am not in favour of the majority of the changes to the current conservation area and believe it would be far more constructive to recommend reducing it to the original 2000 proposal of the village boundary.</p>	<p>lack of street lighting, it is not within the remit of the council or this conservation area review to make that designation.</p> <p>Thank you for this information. This approach is suggested in Section 10.3- Public Realm Enhancements.</p> <p>Comments noted. Please refer to the earlier response as to why reducing the size of the conservation area just to cover the village would not be an appropriate course of action.</p>	<p>No change.</p> <p>No change.</p>
James Macdonald-Buchanan	I have recently been introduced as a partner into the business. I have been "raised and grazed" in Cottesbrooke. I understand that it is proposed that the Conservation area is increased in size. It is already vast and mirrors the Register of Parks and Gardens boundary. This is a "strong boundary", recognised by all heritage bodies, in particular Heritage England. I believe	There is no presumption that the boundary of a conservation area should follow that of a registered park and garden. They are different types of designation. Whilst a registered park and garden recognises the deliberately planned and designed gardens and landscape, a conservation area has a wider remit and also recognises other types of architectural and/or historic interest. The current	No change.

	<p>that any change to that boundary could weaken it, because the extensions are arbitrary and not based on historic evidence.</p> <p>The Estate is already managing many of the things the Officers mention in their review. I agree these make Cottesbrooke special - no satellite dishes, an estate colour, uniformity of porches. The point is the estate is already ahead of the game. That said, I welcome the Officers' recognition of the role the Estate plays, and agree that part of the charm of the village are the grass verges, its lack of street furniture, and no street lights to name a few.</p> <p>As the next generation I want the Estate to be viable and sustainable and so any constraints imposed by</p>	<p>conservation area boundary already diverges from the boundary of the registered park and garden to include Cottesbrooke village. Therefore, there is no reason why it should not diverge in other areas in order to include features that make a positive contribution to its historic interest, appearance and setting. As set out in Section 10.4 of the appraisal, four out of the five of the proposed extensions are due to these areas forming part of the historic landscape dating back to the medieval period (BA1 and 2) and at least to the early 19th century (BA4 and 5). The proposals are based on the study of Lidar survey data and historic maps ranging in date from 1628 to 1950.</p> <p>Comments noted.</p> <p>It is recognised that Cottesbrooke is a working estate. The purpose of the conservation area is not to prevent</p>	<p>No change.</p> <p>No change.</p>
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	<p>third parties feels threatening. Above all, Cottesbrooke must be allowed to adapt, to evolve and to thrive. More constraints could tip the balance. I believe, as custodians, our careful management over many decades has helped make Cottesbrooke something we are all proud of. I ask you not to threaten it with the dead hand of bureaucracy.</p>	<p>development from taking place. The additional planning controls with the conservation area (set out in Section 2.3 of the appraisal) aim to manage change so that the historic character of the conservation area is enhanced. If the proposed extensions are brought into the conservation area there should be no impact on their management by the estate for reasons already stated above in response to the Cottesbrooke Estate's comments.</p>	
West Northants Council officer comments	<p>Can you please consider making the following changes/additions to the document to ensure that the status and significance of Cottesbrooke as a working agricultural estate is recognised.</p> <ul style="list-style-type: none"> • Section 8.5 (loss of character) and/or Section 9.1 (alterations and extensions) <p>Many of the residential and commercial buildings in Cottesbrooke are owned and managed by the Estate. This gives some level of consistency in overseeing and controlling works of maintenance, repair and alteration. Where possible, opportunities should be taken to work with the Estate owners and managers to ensure that ongoing management, use and changes remain sympathetic and compatible with the architectural and historic interest of the buildings and their contribution to the character and</p>	<p>Thank you for the suggested text. This will be incorporated into the final version of the appraisal and management plan.</p>	<p>Section 9.1-Alterations and Extensions, p. 86, include the following text after the first paragraph,</p> <p><u>"Many of the residential and commercial buildings in Cottesbrooke are owned and managed by the Estate. This gives some level of consistency in overseeing and controlling works of maintenance, repair and alteration. Where possible, opportunities should be taken to work with the Estate owners and managers to ensure that ongoing management, use and changes remain sympathetic and compatible with the architectural and historic interest of the buildings and their contribution to the character and</u></p>

	<p>and compatible with the architectural and historic interest of the buildings and their contribution to the character and appearance of the conservation area.</p> <ul style="list-style-type: none"> • Section 9.8 (setting) Cottesbrooke is a working agricultural estate that is managed for arable and livestock farming purposes together with other land-based and sporting uses. There may be conflict between these different and potentially competing uses and interests unless they are effectively managed, with the engagement of all relevant bodies. The role of countryside stewardship and other agri-environment schemes in helping to support rural heritage, including the repair and conservation of historic buildings and structures, and mitigating the impact of agriculture on the environment, is recognised. • Section 9.1. (Trees) Trees and woodlands on the Estate should be managed in accordance with a comprehensive and up to date management plan. Sustainable management of trees and woodlands, which may include periodic felling and replanting with appropriate species, 	<p><u>appearance of the conservation area.”</u></p> <p>Section 9.8-Setting, p.89, add the following text before the first paragraph, <u>“Cottesbrooke is a working agricultural estate that is managed for arable and livestock farming purposes together with other land-based and sporting uses. There may be conflict between these different and potentially competing uses and interests unless they are effectively managed, with the engagement of all relevant bodies. The role of countryside stewardship and other agri-environment schemes in helping to support rural heritage, including the repair and conservation of historic buildings and structures, and mitigating the impact of agriculture on the environment, is recognised.”</u></p> <p>Section 9.9-Trees, p. 89, add the following text after the first paragraph, <u>“Trees and woodlands on the Estate should be managed in accordance with a comprehensive and up to date management plan. Sustainable</u></p>
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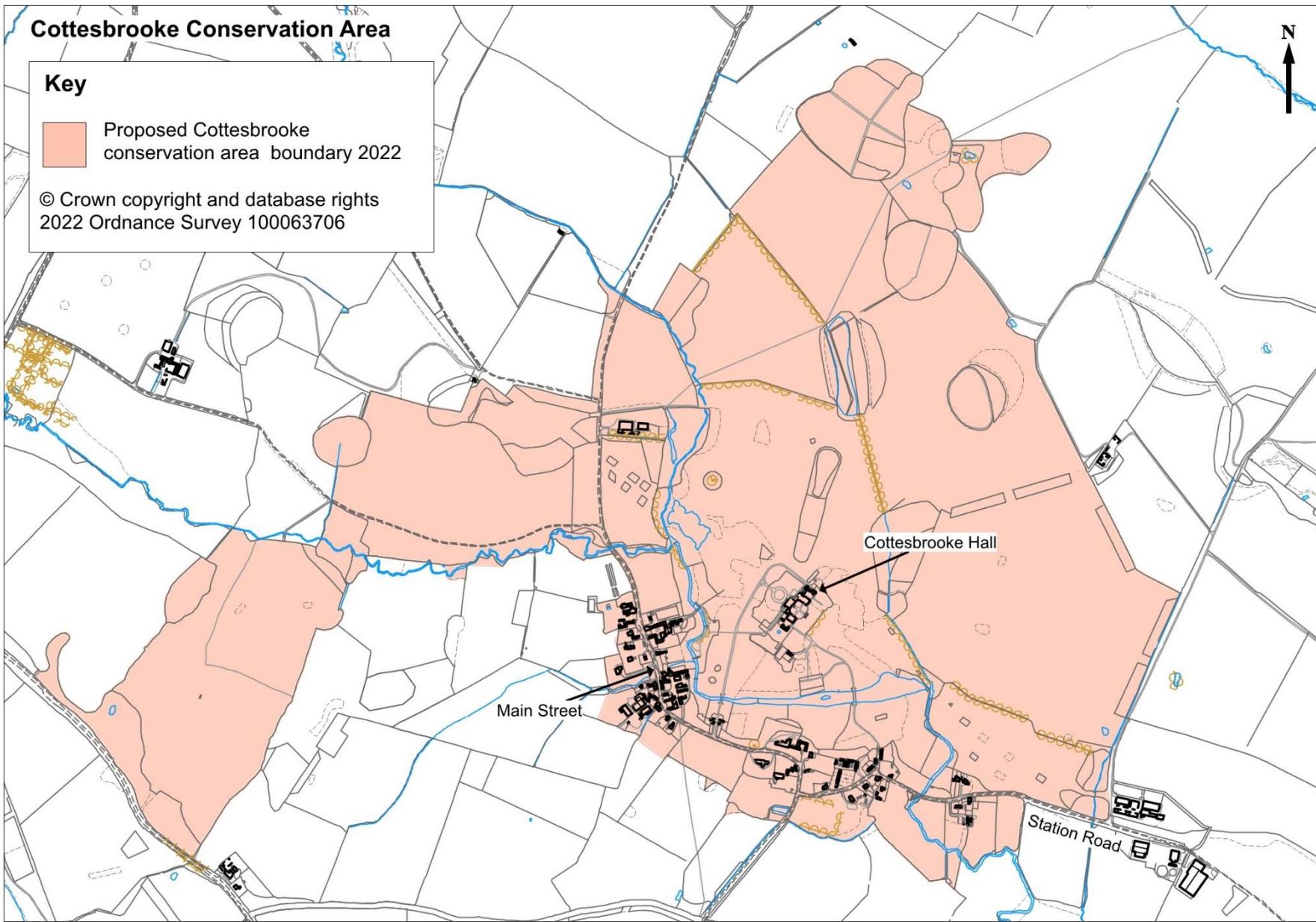
	<p>can meet the productive needs of the Estate whilst sustaining and, where appropriate enhancing, the historic, landscape and wildlife value of these important features.</p>		<p><u>management of trees and woodlands, which may include periodic felling and replanting with appropriate species, can meet the productive needs of the Estate whilst sustaining and, where appropriate enhancing, the historic, landscape and wildlife value of these important features.”</u></p>
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Appendix B – Survey Responses

Respondent	Comments	Suggested response	Suggested action
Do you agree with the proposed boundary for the conservation area? (map available for viewing through link on Conservation Areas webpage)			
Mrs JR Macdonald-Buchanan	Disagree proposed boundary.	No further details were provided in the survey response but the respondent did write separately and those comments have been addressed in Appendix A.	No further change.
Do you think this Appraisal captures the special interest of Cottesbrooke? Please use the text box to highlight any specific features which you think either have or have not been captured.			
Mrs JR Macdonald-Buchanan	It does capture the special interest of Cottesbrooke.	Comments noted.	No change.
Do you agree with the candidates for the Local List? (see pages 75-84 of the Appraisal). Are there any more potential candidates which you would like to suggest? Please use the text box to identify candidates for the Local List, giving an address where possible.			
Mrs JR Macdonald-Buchanan	Disagree candidates.	No further details were provided in the survey response but the respondent did write separately and those comments have been addressed in Appendix A.	No further change.
Do you think there is enough clear guidance regarding conservation areas for residents or those submitting or commenting on a planning application or application for listed building consent? Please use the text box to identify specific areas where guidance is either satisfactory or lacking.			

Mrs JR Macdonald- Buchanan	There is not enough clear guidance.	Comment noted.	No change.
Do you think there are any actions missing from our Management Plan? (see pages 90-93 of the Appraisal). Please use the text box to identify specific actions, giving justification where possible.			
Mrs JR Macdonald- Buchanan	There are no actions missing.	Comment noted.	No change.
Do you think the proposed Article 4 Directions (see pages 86-87 of the Appraisal) would help to preserve special features of the conservation area? Please use the text box to identify specific locations or features at risk or permitted development rights that you feel should be removed?			
Mrs JR Macdonald- Buchanan	Article 4 Directions would not help to preserve special features.	Comment noted.	No change.
Are there any other matters within the Appraisal and Management Plan that you would like to comment on? Please reference any comments to the specific part of the Appraisal where possible (using paragraph or section numbers) and, if seeking a change be clear what change is sought and provide justification where possible.			
Mrs JR Macdonald- Buchanan	Not answered.		No change.

APPENDIX C – Cottesbrooke Conservation Area Boundary Map



APPENDIX D – Local List Candidates

Main Street

Victorian wall-mounted post box
1-6 The Grange
Icehouse west of The Grange
The Old Forge Building
K6 telephone kiosk
32 Main Street
Court End

Station Road

11 and 12 (The Nook)

APPENDIX E – Cottesbrooke Article 4(1) Direction

WEST NORTHAMPTONSHIRE COUNCIL

Town and Country Planning (General Permitted Development)
(England) Order 2015

Direction made under Article 4(1)

RELATING TO THE COTTESBROOKE CONSERVATION AREA

WHEREAS West Northamptonshire Council ('the Council') being the appropriate local planning authority within the meaning of article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015, is satisfied that it is expedient that development of the description(s) set out in the Schedule 1 below should not be carried out on the land/buildings shown coloured red on the attached plan, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990, as amended.

NOW THEREFORE the Council in pursuance of the power conferred on it by Article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 HEREBY DIRECT that the permission granted by Article 3 of the said Order in respect of development of the description set out in the Schedule 1 below shall not apply to development on the said land of the description(s) set out in the Schedule 2 below.

THIS DIRECTION is made under Article 4(1) of the said Order and in accordance with paragraph 1 of Schedule 3, shall come into force when confirmed by the Council within 12 months of the date of this Direction.

SCHEDULE 1

(Descriptions of Development restricted by this Direction)

The enlargement, improvement or other alteration of a dwelling house, where any part of the enlargement, improvement or alteration would affect the principal elevation or any elevation that fronts a highway, waterway or open space being development comprised within Class A of Part 1 of Schedule 2 to the Order and not development comprised within any other Class;

Any alteration or addition to the roof of a dwelling house being development comprised within Class B or Class C of Part 1 of Schedule 2 to the Order and not development comprised within any other Class.

The construction or demolition of a porch outside any external door of a dwellinghouse where the door in question is on a principal elevation or any elevation that fronts a highway, waterway or open space being development comprised in Class D of Part 1 of Schedule 2 to the Order and not being development comprised within any other Class;

The installation, alteration or replacement of a chimney, flue or soil and vent pipe on a dwellinghouse being development comprised in Class G of Part 1 of Schedule 2;

The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure where the gate, fence, wall or other means of enclosure would be within the curtilage of a dwellinghouse and would front a highway, waterway or open space, being development comprised within Class A of Part 2 of Schedule 2 to the Order and not development comprised within any other Class;

The painting of the exterior of any building, where the part of the exterior of the building or work would be the principal elevation of a dwellinghouse or any elevation that fronts a highway, waterway or open space being development comprised within Class C of Part 2 of Schedule 2 to the Order and not being development comprised within any other Class;

Any building operation consisting of the demolition of the whole or any part of any gate, fence, wall or other means of enclosure where the gate, fence, wall or means of enclosure would be within the curtilage of a dwellinghouse and would front a highway, waterway or open space being development comprised within Class C of Part 11 of Schedule 2 to the Order and not being development comprised within any other Class.

SCHEDULE 2

ALL THE land and buildings situated thereon together comprising the following properties and which are more particularly shown red on the plans attached hereto:

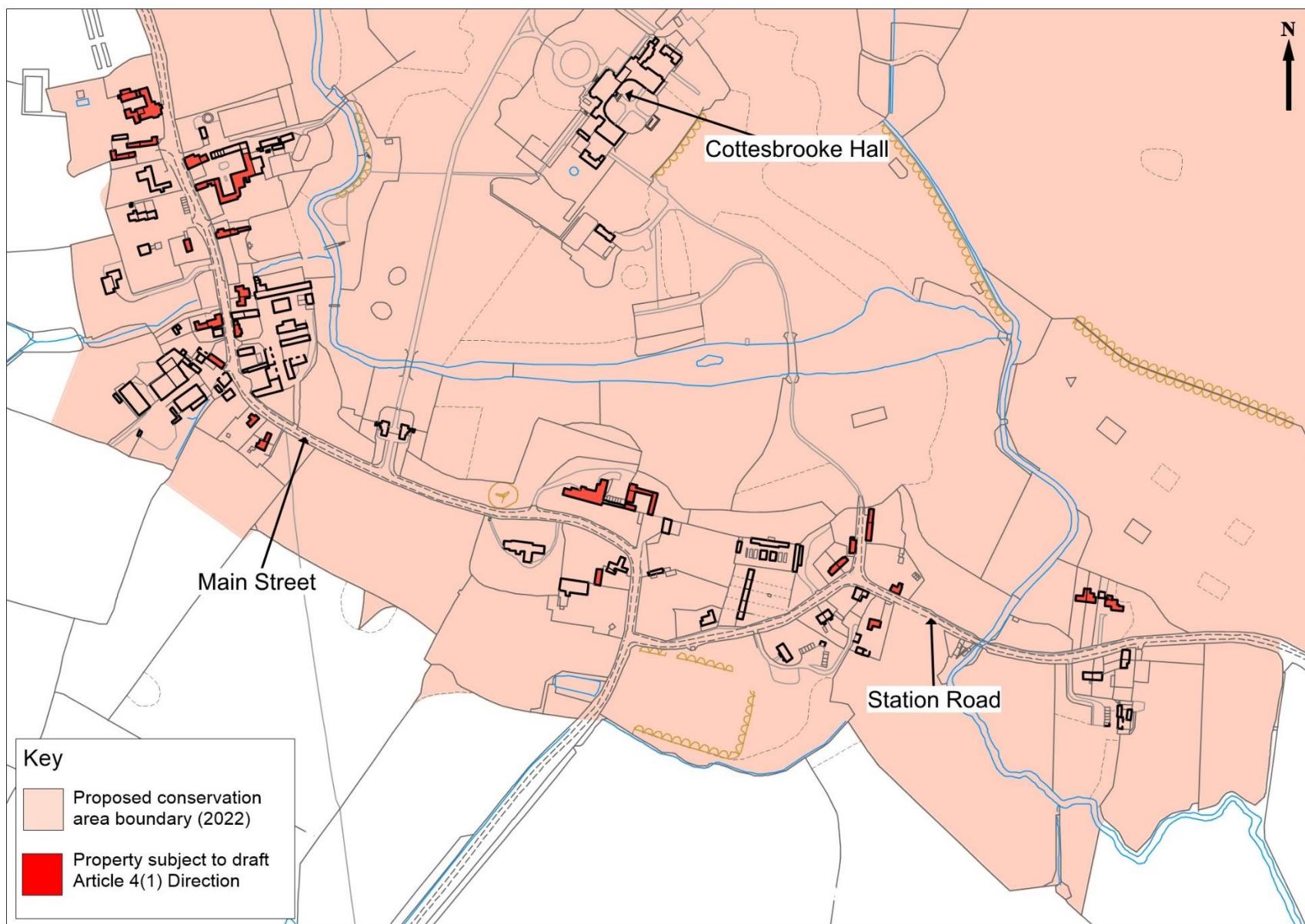
Main Street

Rectory Cottage
Flats 1-6 Cottesbrooke Grange
Stable Cottage,
20 Main Street
21 Main Street
22 Main Street
Home Farmhouse
23 Main Street
23a Main Street
26 Main Street
27 Main Street
30 Main Street
31 Main Street
Rose Cottage
The Stable House
Stable Cottage
Bothy Cottage
Stable Cottage
Wren Cottage
Garden Cottage
Cottesbrooke Cottage
Court End

Station Road

Home Farm
5 Station Road
6 Station Road
7 Station Road
8 Station Road
11 Station Road
12 Station Road
13 Station Road
14 Station Road
15 Station Road

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015, AS AMENDED
DIRECTION MADE UNDER ARTICLE 4(1)
[Land affected]



TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015, AS
AMENDED
DIRECTION MADE UNDER ARTICLE 4(1)
[Land affected]

MADE under the Common Seal of West Northamptonshire Council this
day of 2022

THE COMMON SEAL of WEST NORTHAMPTONSHIRE COUNCIL was affixed to
this Direction in the presence of

Authorised Signatory

CONFIRMED under the Common Seal of **WEST NORTHAMPTONSHIRE
COUNCIL** this day of..... .2022

THE COMMON SEAL of WEST NORTHAMPTONSHIRE COUNCIL was affixed to
this Direction in the presence of

Authorised Signatory__

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WEST NORTHAMPTONSHIRE COUNCIL

PLANNING POLICY COMMITTEE

28 June 2022

Rebecca Breese – Planning, Built Environment and Rural Affairs

Report Title	Canons Ashby Conservation Area
Report Author	Anna Wilson, Heritage Policy Assistant, anna.wilson@westnorthants.gov.uk

Contributors/Checkers/Approvers

Legal	Theresa Boyd	Approval mail received 30/05/2022
West S151	Martin Henry	Approval email received 26/05/2022
Other Director/SME	Stuart Timmiss	Email sent 26/05/2022
Communications Lead/Head of Communications	Becky Hutson	Approval email received 26/05/2022

List of Appendices

Appendix A – Written Responses

Appendix B – Canons Ashby Conservation Area Boundary Map

Appendix C – Local List Candidates

Appendix D – Canons Ashby Article 4(1) Direction

1. Purpose of Report

To consider the responses to the consultation exercise on the draft Canons Ashby Conservation Area Appraisal and Management Plan and further steps to implement the outcomes.

2. Executive Summary

- 1.1. The report sets out the recommendations for the adoption of the conservation area boundary as set out in Appendix B, the adoption of the Canons Ashby Conservation Appraisal and Management Plan as a supplementary planning document (SPD), the inclusion of buildings on the Local List, and proposals for an Article 4(1) Direction. It includes details of how the statutory consultation was undertaken, and the results of the consultation (Appendix A).

3. Recommendations

- 3.1 It is recommended that Planning Policy Committee:
 - a) Agrees that the conservation area boundary as set out in Appendix B be designated and supersedes the designation that was made in 1997.
 - b) Agrees that delegated authority be given to the Interim Head of Planning and Climate Change Policy to make further minor editorial changes to the Canons Ashby Conservation Area appraisal and Management Plan to address any factual or typographical errors and to reflect the fact that the document will be in its intended final form.
 - c) Agrees that the conservation area appraisal and management plan for Canons Ashby be adopted as a supplementary planning document.
 - d) Agrees the Local List entries for Canons Ashby set out in Appendix C.
 - e) Agrees that an Article 4(1) for Canons Ashby in accordance with the proposals in the conservation area appraisal and management plan be made subject to consultation (Appendix D).

4. Reason for Recommendations

- The proposals fulfil the statutory duty of the council to review and designate conservation areas where they meet appraisal criteria.
- The proposals accord with legislation and the council's planning policies.
- The proposals will provide the council with the tools to preserve and enhance the heritage of Canons Ashby, which contributes to the historic character of the West Northamptonshire area. Without these tools the special historic interest of the village may be harmed or lost.
- The proposals are consistent with previous decisions made to designate conservation area boundaries and adopt supplementary planning documents for other towns and villages in the area.

5. Report Background

- 5.1 The council has a statutory duty under the 1990 Planning (Listed Building and Conservation Areas) Act to review its conservation areas and to designate conservation areas where they meet appraisal criteria. At its meeting on 16 March 2022, the council resolved that consultation should take place on the draft conservation area appraisal and management plan for Canons Ashby. The consultation is now complete.
- 5.2 The proposals at Canons Ashby suggested amending the conservation area boundary to include a small, wooded area and an area that contains ponds that originated as medieval fishponds and an upstanding post-medieval archaeological earthwork. The proposals also suggest amending the boundary to exclude a narrow strip of land so the conservation area boundary falls on the same alignment as that of the scheduled monument designation.
- 5.3 The proposals also identified five candidates for the Local List, all being situated in the conservation area, and proposals for an Article 4(1) Direction.

Responses to consultation

- 5.4 There was one response to the consultation, which was received by email, from the archaeological advisor to the council but it did not seek any changes to the appraisal and management plan. The response is set out in Appendix A. No responses were received via letter or the online survey.
- 5.6 Historic England did not seek any changes.
- 5.7 The draft appraisal included initial proposals for an Article 4 Direction in Section 10.2. There are no suggested changes as a result of the consultation exercise and it is suggested that an Article 4 Direction be prepared for the proposed restrictions set out in the draft appraisal.

6. Issues and Choices

- 6.1 Conservation area status and an adopted appraisal and management plan, which has the status of a supplementary planning document (SPD), adds weight to the consideration of non-designated heritage assets in decision making. It also provides detail for applicants and decision makers on the special interest of the conservation area as a designated heritage asset. The proposed conservation area boundary and appraisal and management plan have been produced with the aim of providing proportionate and effective means of protecting the special architectural and historic interest of Canons Ashby for the benefit of present and future generations.
- 6.2 The alternative options would be not to endorse the designation of the conservation area boundary and the adoption of the Canons Ashby Conservation Area Appraisal and Management Plan as a supplementary planning document, not to endorse the candidates for the Local List, and not to ‘make’ the Article 4(1) Direction.

- 6.3 Not endorsing the boundary designation, the adoption of the appraisal and management plan, not endorsing the candidates for the Local List, and not ‘making’ the proposed Article 4(1) Direction would leave the council without valuable tools with which to protect and enhance the special architectural and historic interest of Canons Ashby.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 Adopting the appraisal, designating a new conservation area boundary and making Article 4 directions would have no material financial effects. Minor costs for placing adverts in the London Gazette and a local newspaper will be covered from existing budgets.

7.2 Legal

- 7.2.1 Supplementary Planning Documents (SPDs) are defined by the Planning and Compulsory Purchase Act 2004. The detailed requirements for SPDs and their adoption are provided by the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 7.2.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on local authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 7.2.3 The SPD would supplement existing policies, predominantly the West Northamptonshire Joint Core Strategy and the Settlements and Countryside Local Plan (Part 2) 2020.
- 7.2.4 Directions under Article 4 of the Town and Country Planning (General Permitted Development)(England) Order 2015 (No. 596) require planning permission to be obtained for works which would otherwise be permitted development.

7.3 Risk

- 7.3.1 There are no material risks foreseen in the endorsement of the conservation area designation, adoption of the appraisal and management plan or the making of the Article 4(1) Direction.
- 7.3.2 Not endorsing the conservation area designation, adoption of the Appraisal and Management Plan and the making of the Article 4(1) Direction would be likely to weaken protection for heritage in Canons Ashby and thus increase the risk of its loss.

7.4 Consultation

- 7.4.1 The Canons Ashby Conservation Area Appraisal and Management Plan consultation document was subject to a formal six-week public consultation which began on 4 April 2022 and ended on 16 May 2022. This followed an initial online exhibition held on 18 November 2021 which was attended by the ward councillors and three members of the public. A separate meeting/site visit also took place with the property manager of Canons Ashby House (National Trust). A second virtual public meeting was organised to be held during the consultation period on 3 May 2022. Despite the meeting being publicised through the usual channels, there were no attendees. The PowerPoint presentation slides and notes were made available on the council's website.
- 7.4.2 As noted in the appraisal a separate consultation exercise is beneficial before an Article 4 Direction has effect. The process for this type of Article 4 Direction requires that they be 'made' and then consulted on. Only if an Article 4 Direction is confirmed does it have legal effect. Following consultation the matter would be brought back to Planning Policy Committee for the direction to be confirmed or not.

7.5 Consideration by Overview and Scrutiny

Not applicable

7.6 Climate Impact

- 7.6.1 The designation of the conservation area and adoption of the Appraisal and Management Plan as a supplementary planning document are unlikely to have a negative impact on the climate.

7.7 Community Impact

- 7.7.1 It is unlikely that the adoption of this document would have any material effect on crime or disorder.
- 7.7.2 The proposed course of action should not have any perceptible differential impact on people with protected characteristics.
- 7.7.3 Endorsing the designation of the conservation area boundary and the adoption of the conservation area appraisal and management plan as an SPD would assist in conserving the historic character of Canons Ashby and contribute to preserving the character of places which make up West Northamptonshire. As such, it would support the well-being of residents and those who work in or visit Canons Ashby and the wider area.

8. Background Papers

Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework

Planning (Listed Building and Conservation Areas) Act 1990

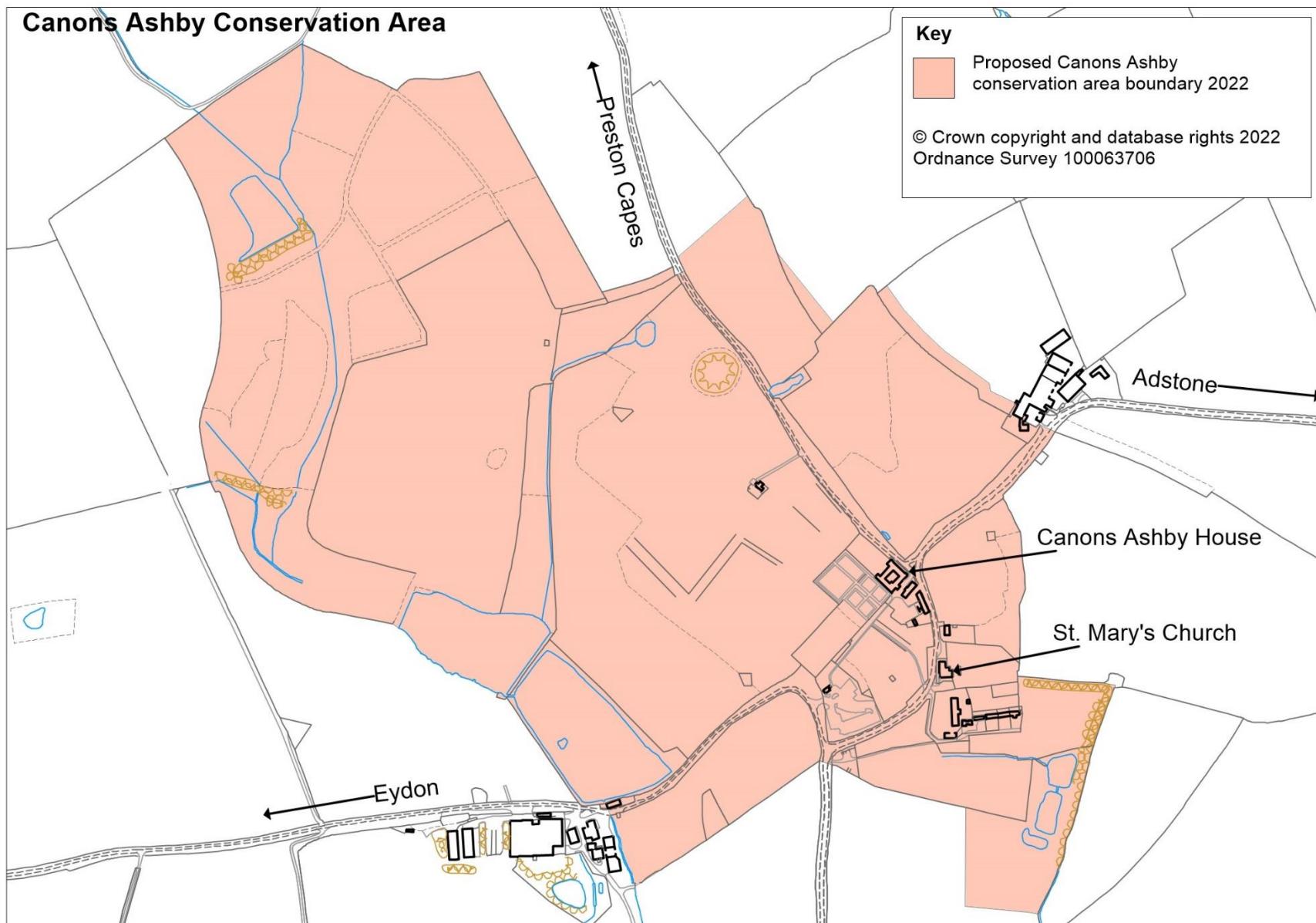
The Town and Country Planning (Permitted Development and Miscellaneous Amendments) (England) Regulations 2020

West Northamptonshire Council Planning Policy Committee Report 16 March 2022 -
Permission for consultation on draft Canons Ashby Conservation Area Appraisal and
Management Plan and proposed boundary.

Appendix A – Written responses

Respondent	Comments	Suggested Response	Suggested Action
Liz Mordue, Archaeological Advisor to West Northants Council	Thank you for consulting the Archaeological Advisor on the above CAAMP. I can confirm that the archaeological information and recommendations are appropriate, and have no further comments to make.	Comments noted.	No change.

APPENDIX B – Canons Ashby Conservation Area Boundary Map



APPENDIX C – Local List Candidates

Banbury Road

Lodge Farmhouse

The Woodyard

Park Cottage

Field barn south of Canons Ashby House

Field barn northwest of Park Cottage

APPENDIX D – Canons Ashby Article 4(1) Direction

WEST NORTHAMPTONSHIRE COUNCIL

Town and Country Planning (General Permitted Development)
(England) Order 2015
Direction made under Article 4(1)

RELATING TO THE CANONS ASHBY CONSERVATION AREA

WHEREAS West Northamptonshire Council ('the Council') being the appropriate local planning authority within the meaning of article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015, is satisfied that it is expedient that development of the description(s) set out in the Schedule 1 below should not be carried out on the land/buildings shown coloured red on the attached plan, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990, as amended.

NOW THEREFORE the Council in pursuance of the power conferred on it by Article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 HEREBY DIRECT that the permission granted by Article 3 of the said Order in respect of development of the description set out in the Schedule 1 below shall not apply to development on the said land of the description(s) set out in the Schedule 2 below.

THIS DIRECTION is made under Article 4(1) of the said Order and in accordance with paragraph 1 of Schedule 3, shall come into force when confirmed by the Council within 12 months of the date of this Direction.

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)(ENGLAND) ORDER 2015, AS AMENDED

DIRECTION MADE UNDER ARTICLE (4)1

[Land affected]

SCHEDULE 1

(Descriptions of Development restricted by this Direction)

The enlargement, improvement or other alteration of a dwelling house, where any part of the enlargement, improvement or alteration would affect the principal elevation or any elevation that fronts a highway, waterway or open space being development comprised within Class A of Part 1 of Schedule 2 to the Order and not development comprised within any other Class;

Any alteration or addition to the roof of a dwelling house being development comprised within Class B or Class C of Part 1 of Schedule 2 to the Order and not development comprised within any other Class.

The construction or demolition of a porch outside any external door of a dwellinghouse where the door in question is on a principal elevation or any elevation that fronts a highway, waterway or open space being development comprised in Class D of Part 1 of Schedule 2 to the Order and not being development comprised within any other Class;

SCHEDULE 2

ALL THE land and buildings situated thereon together comprising the following properties and which are more particularly shown red on the plans attached hereto:

Banbury Road

Lodge Farm
The Woodyard
1-3 Hill View Cottages
Park Cottage

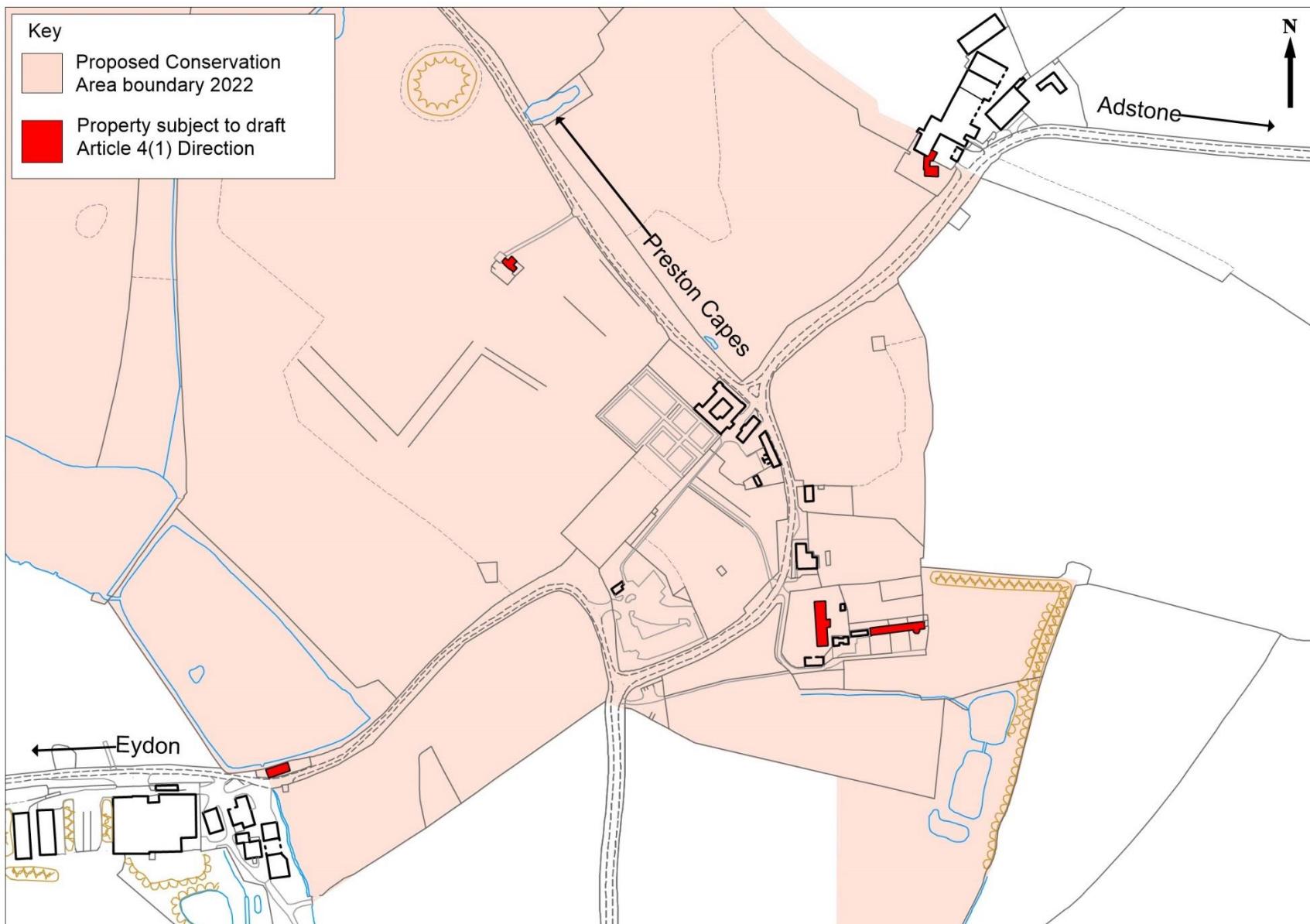
Eydon Road

South West Farm

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015, AS AMENDED

DIRECTION MADE UNDER ARTICLE 4(1)

[Land affected]



TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015, AS
AMENDED
DIRECTION MADE UNDER ARTICLE 4(1)
[Land affected]

MADE under the Common Seal of West Northamptonshire Council this
day of 2022

THE COMMON SEAL of WEST NORTHAMPTONSHIRE COUNCIL was affixed to
this Direction in the presence of

Authorised Signatory

CONFIRMED under the Common Seal of **WEST NORTHAMPTONSHIRE
COUNCIL** this day of..... .2022

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WEST NORTHAMPTONSHIRE COUNCIL

PLANNING POLICY COMMITTEE

28 June 2022

Councillor Rebecca Breese

Cabinet Member for Strategic Planning, Built Environment and Rural Affairs

Report Title	Northampton Housing Action Plan
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Report Author	Paul Everard Planning Policy & Heritage Manager Paul.everard@westnorthants.gov.uk Noreen Banks Planning Policy Team Leader noreen.banks@westnorthants.gov.uk
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Contributors/Checkers/Approvers

West S151 (for West and joint papers)	Martin Henry Executive Director, Finance	26 May 2022
Other Director/SME	Stuart Timmiss Executive Director: Place, Economy & Environment	7 June 2022
Legal	Theresa Boyd Solicitor	30 May 2022
Communications Lead/Head of Communications	Becky Hutson	26 May 2022

List of Appendices

Appendix A – Housing Action Plan

1. Purpose of Report

- 1.1 To seek Members' approval on the contents of the Housing Action Plan and its publication on the website in line with Government requirements.

2. Executive Summary

- 2.1 Every year, the Government publishes the results of the Housing Delivery Test (HDT) for each local authority. The test was introduced by the National Planning Policy Framework (2018). It seeks to measure the rate at which new homes are created in a council's area against the authority's housing requirement over a three-year period. Councils which pass the test (this equates to at least 95% of the required housing numbers to be delivered) do not need to produce a housing action plan, but Councils that do not pass will need to undertake certain actions depending on the outcome of the test measurement.
- 2.2 On 14 January 2022, the Government published its latest results for the housing delivery test for the three years ending April 2021. Northampton was required to deliver 2029 dwellings over the three-year period, but managed to deliver only 1826 dwellings, which is 90% of the required number. As a consequence, the Council is required to publish a Housing Action Plan for Northampton which demonstrates what actions it will take to ensure that housing delivery will meet the 95% target required by the Government.

3. Recommendations

- 3.1 It is recommended that the Committee approve the Housing Action Plan for publication on the Council's website, in line with Government requirements.

4. Reason for Recommendations (NOTE: this section is mandatory and must be completed)

- 4.1 To accord with Government requirements.

5. Report Background

- 5.1 Every year, The Government publishes the results of the Housing Delivery Test (HDT) for each local authority. The test was introduced by the National Planning Policy Framework (2018) and seeks to measure the rate at which new homes are created in a Council's area against the authority's housing requirement over a three-year period. Councils which pass the test, which requires that at least 95% of the required dwellings are delivered, do not need to do anything. However, Councils that do not pass need to undertake certain actions depending on the outcome of the test measurement. The actions required are dependent on the delivery test result. As Northampton only delivered 90% of its requirement, the Council is required to publish an Action Plan which explains why delivery was less than expected and what actions will be taken to ensure that the situation improves. This needs to be published within six months of the results being made available. Therefore, this Housing Action Plan must be published by the 14 July 2022.
- 5.2 The HDT covers the previous three financial years. For the 2021 measurement, the following years were assessed: 2018/19; 2019/20 and 2020/21. Because this period is prior to the Vesting Day for West Northamptonshire Council, the Government carried out separate housing delivery tests for Northampton, South Northamptonshire and Daventry. The Daventry and South Northamptonshire areas both passed the housing delivery test. The Housing Delivery Test

compares the net homes delivered over three years to the homes required over the same period. The formula for calculating the latest test was as follows:

Housing Delivery Test (%)= Total net homes delivered over 3 year period divided by the total number of homes required over 2 year 7 month period

- 5.3 The report is required to provide explanations as to why housing delivery was below 95%. The Housing Action Plan outlines the key reasons including the slow delivery of the Sustainable Urban Extensions. This slower rate of growth can be attributed to two reasons. First, when the West Northamptonshire Joint Core Strategy was being prepared, there was an expectation that the market conditions would remain at a high rate and high housing numbers could continue to be delivered. That proved to not be the case. Secondly, resources within the Council's Northampton Development Management section continued to be very stretched and this impacted on the time taken to approve planning applications.
- 5.4 A series of actions has been suggested in the Action Plan including an outline of the opportunities presented by the creation of West Northamptonshire Council to replace the previous sovereign councils. Opportunities in terms of shared resources, the appointment of new recruits and the potential to consider planning performance agreements form part of the actions to help improve housing delivery rates in Northampton. Also of importance is the role that the Regeneration team play in delivering housing as part of the wider regeneration schemes.

6. Issues and Choices

- 6.1 The Government requires housing action plans to be published where housing delivery over the last three years has not met the 95% target. This Northampton Action Plan will need to be published by 14 July 2022.
- 6.2 If Members agree to publish the Housing Action Plan, then the Government's requirement will be met. There will be clarity in terms of how Northampton will capitalise on the opportunities provided by the creation of West Northamptonshire Council by creating more certainty for developers and landowners, as well as details on what actions the Council will take to improve the environment in which delivery rates can improve.
- 6.3 If Members choose not to publish the Action Plan, then this will contravene the Government's requirement.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 The council's costs will be covered by the finance already agreed to recruit new members of staff to deal with planning applications.

7.2 Legal

7.2.1 The Government published these housing delivery tests results in accordance with the requirements of the National Planning Policy Framework (2018).

7.3 **Risk**

7.3.1 There are no significant risks arising from the publication of this report.

7.4 **Consultation**

7.4.1 Internal consultation with colleagues in Development Management were undertaken.

7.5 **Consideration by Overview and Scrutiny**

7.5.1 Not applicable.

7.6 **Climate Impact**

7.6.1 The report seeks to identify actions which will result in increasing housing delivery rates in Northampton. Any housing developments will need to comply with updated planning policies including the Northampton Local Plan Part 2 (currently undergoing examination) which contains policy guidelines which address climate change issues and how schemes can be delivered in a sustainable manner.

7.7 **Community Impact**

7.7.1 The report seeks to identify actions which will result in increasing housing delivery rates in Northampton. This will ensure that Northampton's housing requirements will continue to be met.

7.8 **Communications**

7.8.1 The Housing Action Plan will be published on the website in line with the council's communications and accessibility guidelines.

8. Background Papers

8.1 Northampton Housing Action Plan (July 2022)



**West
Northamptonshire
Council**

**NORTHAMPTON
HOUSING ACTION PLAN (July 2022)**

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ONE

INTRODUCTION

Background

1.1 The Government publishes the results of the Housing Delivery Test (HDT) for each local authority on an annual basis. The test was introduced by the National Planning Policy Framework in 2018 and seeks to measure the rate at which new homes are created in a Council's area against the authority's housing requirement over a three-year period. Councils which pass the test do not need to do anything, but Councils that do not pass will need to undertake certain actions depending on the outcome of the test measurement.

1.2 The HDT covers the previous three financial years. For the 2021 measurement, the following years were assessed: 2018/19; 2019/20 and 2020/21. The Housing Delivery Test compares the net homes delivered over three years to the homes required over the same period. The formula for calculating the latest test was follows:

Housing Delivery Test (%) = Total net homes delivered over 3 year period divided by
Total number of homes required over 2 year 7 month period*

**For the 2021 measurement, there is a reduction in period for measuring total homes required. Usually, this would be measured over a 3-year period, but an 8-month period has been used for the 2020/21 monitoring year. This is to account for the considerable variations in levels of housing delivery as local planning authorities and construction industry faced disruption on a national, regional and local level due to the pandemic. Additionally, an 11-month period has been used for the 2019/20 monitoring year. This was to account for the disruption to housing delivery and monitoring caused by the first national lockdown in March 2020.¹*

1.3 On 14 January 2022, the Government published its latest results. Northampton was required to deliver 2029 dwellings over the three-year period, but managed to deliver only 1826 dwellings, which is 90% of the required number. Because between 85% and 95% of the target has been delivered, the Council was required by the Government to publish a Housing Action Plan for Northampton within six months of the publication of the test measurement. i.e. by 14 July 2022. Further information can be found in the Table 1.

Table 1:
Housing delivery test result and consequence (Northampton)

	2018/19	2019/20	2020/21	Total homes required	Total homes delivered

¹ [Housing Delivery Test: 2021 measurement technical note - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement-technical-note)

Number of homes required	796	731	503	2029	
Number of homes delivered	597	576	653		1826
Housing delivery test 2021 measurement	90%				
Housing delivery test 2021 consequence	Action Plan to be prepared				

Source: [2021 HDT Final Results .ods \(live.com\)](#)

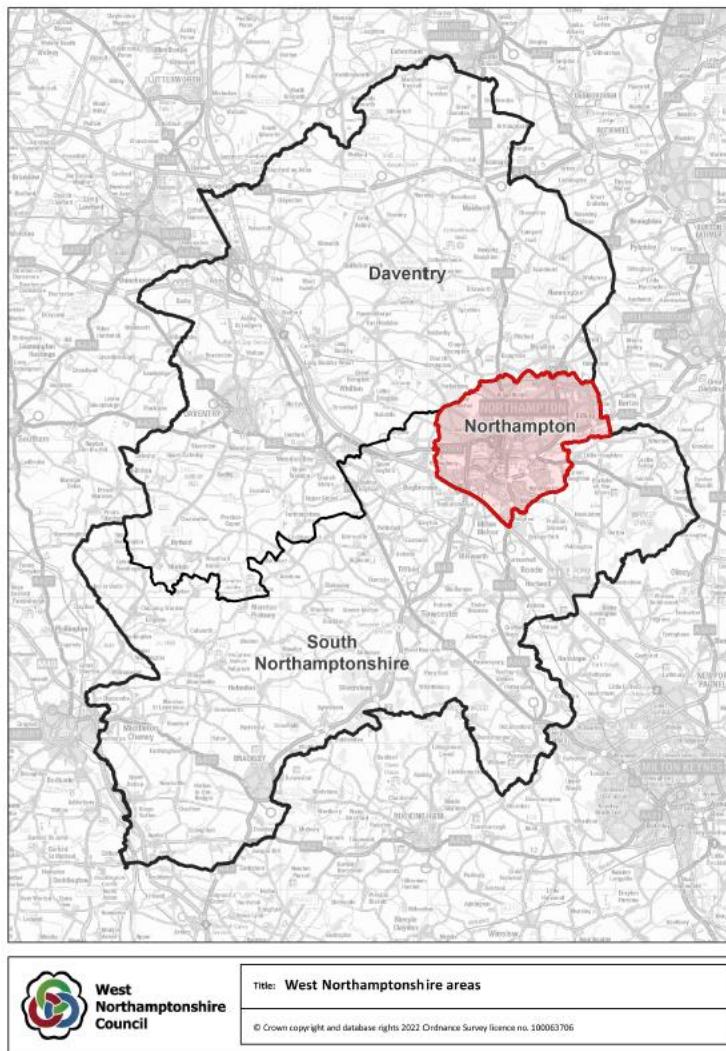
1.4 It should be noted that in April 2021, West Northamptonshire Council was formed, combining the previous local authorities of Northampton Borough, Daventry District, South Northamptonshire Councils and Northamptonshire County Council (see Map 1).

1.5 The Government has indicated that for authorities that have recently reorganised to form new unitary or single tier authorities, the following applied to 2020/21 and it is expected that the same could be applied in 2021/22:

Local authorities who formed new authorities (unitary or new lower-tier authorities) can choose to have their Housing Delivery Test published using their former authority boundaries or their new unitary boundaries for the purpose of the measurement until the fifth anniversary of the new authority's existence. Local authorities have the option to choose either approach over this period².

² [Housing Delivery Test: 2021 measurement technical note - GOV.UK \(www.gov.uk\)](#)

Map 1 West Northamptonshire areas



Aims of this report

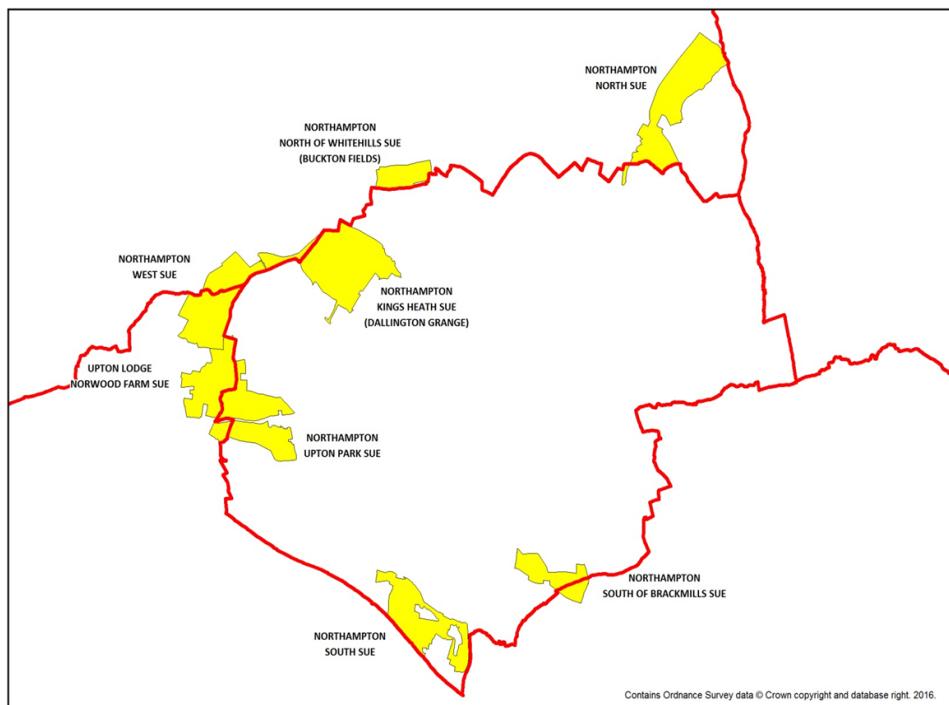
1.6 The aims of this report are to:

- identify the root causes for the housing under delivery
- identify key actions which could be undertaken to ensure that every effort is made to enable housing delivery and to meet the targets set out in the development plan
- set out the timeline when these actions are expected to begin

TWO POLICY CONTEXT

2.1 As part of its strategy to meet Northampton's housing needs to 2029, the Joint Core Strategy allocated Sustainable Urban Extensions in the Northampton Related Development Area (see Map 2), which includes the whole of the former Northampton borough and adjoining parts of the former Daventry District and South Northamptonshire Council areas (see Map 2). The strategy was heavily reliant on these SUEs providing the numbers of dwellings needed. In Northampton itself, about 7,100 dwellings (or 37%) were expected to be delivered by those parts of the SUEs in the former borough, out of the total of 18,870 dwellings.

**Map 2
Sustainable Urban Extensions in and around Northampton**



2.2 The West Northamptonshire Joint Core Strategy set out housing trajectories for the NRDA, Northampton and those parts of Daventry and South Northamptonshire not in the NRDA.

THREE SCALE OF THE PROBLEM OF UNDER DELIVERY IN NORTHAMPTON

3.1 Table 2 below shows the dwelling completions in Northampton between 1st April 2011 and 31st March 2021. This shows that housing completions were 4,278 dwellings below the housing requirement to 2021.

Table 2
Housing completions and delivery in Northampton to 2021

	Housing Requirement 2011-2021	Actual Housing Completions (Net Additions) 2011-2021	Delivery of Dwellings compared to the Requirement
Total dwellings	11,236	6958	-4,278

3.2 Table 3 sets out the Joint Core Strategy trajectories and shows that there have been significant shortfalls in delivery over a number of years both in Northampton and the wider NRDA.

Table 3
Housing requirement for Northampton and the wider NRDA 2011 - 2029

Year	Total Dwellings expected in Northampton	Total Dwellings delivered in Northampton	Total Dwellings expected in the NRDA	Total Dwellings delivered in the NRDA
2011/12	423	423	423	423
2012/13	516	516	516	516
2013/14	785	834	785	834
2014/15	1,039	877	1,129	877
2015/16	1,132	739	1,392	883
2016/17	1,292	831	1,742	1,174
2017/18	1,426	866	1,981	1,086
2018/19	1,544	589	2,154	794
2019/20	1,588	578	2,418	742
2020/21	1,491	653	2,291	942
2021/22	1,355	1,156	2,130	1,517
2022/23	1,278		2,123	
2023/24	1,025		1,875	
2024/25	900		1,735	
2025/26	875		1,600	
2026/27	815		1,565	
2027/28	695		1,370	

2028/29	694		1,244	
Total 11-29	18,873		28,473	

FOUR ROOT CAUSES OF UNDER DELIVERY IN NORTHAMPTON

4.1 The housing delivery trajectories set out in the JCS were heavily influenced by economic conditions and intelligence at the time it was being progressed. The view was taken that housing delivery rates would recover from the low base caused by the economic downturn of 2008, reaching levels exceeding 1,000 dwellings per year from 2014/15 to 2023/24. In practice, these delivery rates did not materialise. A major reason for this is that there has been very slow progress in housing delivery at the SUEs on which Northampton's housing numbers have been so heavily reliant. It is inevitable that larger developments take longer to build out than smaller ones for reasons including the need to negotiate complex Section 106 Agreements to provide the necessary infrastructure. Because a high proportion of its housing is to be delivered through large SUEs, Northampton has been disproportionately affected by this. This effect has been further exacerbated by the less favourable market conditions that have existed locally in comparison to the more rural parts of West Northamptonshire where delivery has more closely followed the trajectories set out in the JCS.

4.2 Table 4 shows in detail how slow the rates of housing delivery were at the SUEs in Northampton over the three years from 2018/19 to 2020/21. The table clearly illustrates that the developments at the SUEs have not progressed as rapidly as predicted and shows the annual completion rates which are lower than the trajectory. For instance, for Northampton South SUE, approval has been granted for the first phase of the scheme in 2017, but only 98 had been completed by 2021/22. For the South of Brackmills SUE, reserved matters were approved in 2019, and only 41 of the 385 dwellings approved have been completed to date.

Table 4
Northampton related Sustainable Urban Extensions – Completions

SUE name	Planning Permission	Capacity	Planning Status	18 / 19	19 / 20	20 / 21	21 / 22	Total Completions	Remaining
N5 – Northampton South SUE	N/2013/1035 OL approved for 1000	651	C	0	0	0	0	0	651
	Phase 1 - N/2017/1566 RM approved for 349	349	C	0	0	0	98	98	251
N6 – Northampton South of Brackmills	N/2013/0338 OL approved for 1000	615	C	0	0	0	0	0	615
	Phase 1 - N/2019/0048 RM approved for 385	385	C	0	0	0	41	41	344

	N/2017/1369 OL approved for 115	115	C	0	0	0	0	0	115
N7 – Kings Heath SUE	N/2014/1429 OL approved for 3000	3000	C	0	0	0	0	0	3000
N9 – Upton Park SUE	N/2011/0997 OL approved for 1000		C					0	
	N/2018/0426 RM approved for 860	860	C	0	0	4	130	134	726
N9A – Northampton Upton Lodge SUE	N/2017/0091 OL AIP for 1400	1400	C	0	0	0	0	0	1400
	N/2018/0774 Full approved for 118	118	C	0	0	33	64	97	21
	N/2010/0301 Full approved for 80	80	C	0	0	0	0	80	0

Determination of planning applications

4.3 The previous Northampton Borough Council Development Management team delivered a 100% response rate in determining planning applications for major housing development within the statutory timeline over the 3-year period. However, for the large housing sites, many of the applications dealt with were approvals in principle, such as the outline planning application for Upton Lodge SUE with negotiations ongoing regarding the Section 106 agreement, or outline approvals, such as Dallington Grange (or Kings Heath Sustainable Urban Extension) where a reserved matters application is yet to be submitted.

FIVE

THE SITUATION IN 2022

5.1 The outcome of the latest housing monitoring exercise shows that completion rates have increased for the year 2021/22. Table 5 below shows that the completion rates have increased to above 1,000 for the first time, in 2021/22. It is expected that, following the recent increase in completions, the Housing Delivery Test for the 2021/22 will be 95% or more.

Table 5
Housing completions

Year	Completion
2017/18	866
2018/19	589
2019/20	578
2020/21	653
2021/22	1,156
Total	3,842

5.2 Regarding the determination of planning applications, matters are looking less favourable, for the period 2021/22, 77.2% of planning decisions were delivered within the statutory timescale. This can be attributed to the impact of transitional effects with the move from three local planning authorities to one, and higher than normal staff turnover.

SIX

ACTIONS FOR IMPROVING DELIVERY

Overview

6.1 This section sets out a series of actions that the Council is already undertaking and new actions that it will take to seek an uplift in delivery rates.

West Northamptonshire Council

6.2 The Council published its first Corporate Plan in 2021. The plan sets out six priorities including the delivery of thriving towns, through sustainable planning for growth. The Council continues to identify ways to support growth including the aim to complete an infrastructure road map, through the West Northamptonshire Strategic Plan, to support development.

6.3 This will give certainty to developers that the Council supports growth and will continue to work in partnership with the relevant sectors to deliver growth.

Progression of the Northampton Local Plan Part 2

6.4 The hearing sessions of the Northampton Local Plan Part 2 (LPP2) took place in November 2021. This followed the submission of the Northampton Local Plan Part 2 for independent examination in February 2021.

6.5 The LPP2 is still going through examination. The Plan includes the proposed allocation of 53 sites for residential development. These sites were allocated following a rigorous assessment of over 500 sites. Developers, landowners and site promoters were invited to submit their sites for development allocation consideration as part of the Local Plan Call for Sites exercise in spring 2016. The sites which were subsequently selected for allocations have gone through a sustainability appraisal process, habitats regulations assessment and a viability assessment. In undertaking the assessments, the Council worked closely with site promoters and landowners to ensure that the allocations were deliverable and developable. Statements of Common Ground were also agreed for the larger sites.

6.6 In January 2022, the Planning Inspectors issued their [post hearing letter](#), indicating that the plan was capable of being found sound and that proposed main modifications would need to be prepared and released for public consultation. They indicated that this should only be undertaken once the Mitigation Strategy for the Upper Nene Valley Gravel Pits Special Protection Area had been adopted. The Mitigation Strategy was adopted on 16 March 2022.

6.7 Subject to the views of members, the Proposed Main Modifications to the LPP2 are expected to be released for public consultation in the summer of 2022.

6.8 This demonstrates that the Council is progressing well towards the adoption of an updated local plan, thereby providing certainty to developers in terms of allocations and the determination of planning applications using an up-to-date Part 2 Plan based on recent evidence. The Council continues to work closely with developers and

landowners through the annual housing monitoring exercise, the preparation of the strategic plan for West Northamptonshire and the progression of its updated Local Plan.

Housing land availability monitoring

6.9 The Council continues to monitor progress in housing delivery. In preparing the LPP2, the Council agreed a number of Statements of Common Ground (SoCGs) with developers regarding housing delivery numbers and timescales on their sites. Importantly these identify any barriers to delivery. The Council can then identify areas where it might be able to assist through funding or collaborative working. From April 2022, the Council will seek to agree SoCGs for all sites of 50 or more dwellings in Northampton. The Council will increase its monitoring of sites of 50 dwellings or more to twice a year so it can continue to ascertain progress made in the housing development environment.

West Northamptonshire Strategic Plan

6.10 The West Northamptonshire Joint Core Strategy (JCS, forming the West Northamptonshire Local Plan Part 1) was adopted in 2014.

6.11 A Strategic Plan is currently being prepared to replace the JCS, covering the whole of the West Northamptonshire area, including Northampton. It has reached the Options stage of the plan preparation process. Included in the progress to date is a strategic land availability assessment, a process which invites landowners and developers to put forward their sites for consideration for strategic development allocation.

Developers Forum

6.12 A Developers Forum was established by Northampton Borough Council, which brought together a wide range of developers with interests in land within its administrative boundary.

6.13 The Council will re-introduce the Developers Forum, and will invite developers and site promoters to a quarterly meeting with relevant representatives from the Council including officers from Development Management, Planning Policy and Assets.

Development Management

6.14 West Northamptonshire Council is in the process of reviewing how its planning services can be reconfigured.

Planning Performance Agreements (PPAs)

6.15 PPAs have not been entered into in recent years in the Northampton area. The key reason for this is that there were insufficient staff to provide a dedicated service. As part of the review of its planning services the Council will explore opportunities to make PPAs available in the Northampton area in future.

Fast-tracked planning decision making

6.16 Whilst there may be opportunities to assess whether certain applications can be prioritised, conditions simplified or their discharge phased, the Northampton area team does not currently have a fast-tracked system for determining planning applications. The team aims to ensure that the conditions are not too onerous, and that these conditions are phased. This is another area in which the opportunity arises to consider a new approach across West Northamptonshire, which would fast-track the decision-making process to enable development to commence within a shorter timescale.

6.17 The local authority is reviewing its resources, back-office systems and processes to ensure that more planning applications can be determined within the statutory period. The issue remains that there are problems associated with resources which will hopefully be addressed as progress is made with reviewing the Development Management team structure across West Northamptonshire and recruiting to vacant posts.

Regeneration

6.18 West Northamptonshire Council has an ambitious programme for regeneration. This includes promoting land in Council ownership, securing the funding and delivery of key projects including those within the Enterprise Zone (see map below). Whilst the majority of the projects are to do with developments for commercial use, there are some where residential schemes are included. Examples include Four Waterside and Northampton Railway Station. In addition, the departure of large retailers from the town centre including Debenhams, British Home Stores and Marks & Spencer provide further opportunities for housing to be included in any redevelopment / conversion schemes. The Debenhams site, for example, has approval for the demolition of the existing building and redevelopment of the site for purpose-built student accommodation (except for the ground floor).

Map 3:
Northampton Waterside Enterprise Zone



6.19 The Council also successfully secured funding to regenerate the Market Square, the largest market in England. It is anticipated that this project will complete within the next 2 to 3 years.

6.20 These efforts, which involve partnership working with the private sector, will not only regenerate the town but also increase its attractiveness as a destination of choice for both homeowners and investors. This could potentially lead to housing developments being delivered more quickly to meet ongoing demand.

Planning Policy Committee

6.21 The Committee was established as part of the new Committee structure for West Northamptonshire. The Committee will continue to support policy documents which will contribute towards the improvement and delivery of key actions including local plans and neighbourhood plans, both of which will incorporate housing delivery within their policies.

Summary of Actions

6.22 The table below summarises the actions and proposed timeline when the action is expected to start.

Table 6
Summary of actions

Action	Activating year		
	2022/23	2023/24	2024/25
Restructure (and recruiting to vacant posts) within West Northamptonshire Council	✓		
Adopt the Northampton Local Plan Part 2	✓		
Examination of the Strategic Plan			✓
Housing monitoring to be undertaken twice a year	✓		
Create a Developers and Site Promoters Forum	✓		
Development Management improvements to the decision-making process	✓		
Regeneration Projects promoted by the council			✓

SEVEN

PROJECT MANAGEMENT AND MONITORING

Northampton Local Plan Part 2 progress

7.1 Consultation on the Proposed Modifications is expected to take place in the summer of 2022. The Local Plan is expected to be adopted within this financial year, therefore providing greater certainty for developers in terms of housing allocations and clarity in terms of development management policies.

Housing monitoring

7.2 This will be undertaken on a bi-annual basis. This will ensure that the Council monitors progress of housing deliver effectively. Developers will continue to be contacted with regards to housing delivery status as well as the signing of annual Statements of Common Ground.

Developer Forum

7.3 This will be formed within the financial year, with meetings expected to take place every quarter.



WEST NORTHAMPTONSHIRE COUNCIL

PLANNING POLICY COMMITTEE

28 JUNE 2022

PORTFOLIO HOLDER FOR PLANNING, BUILT ENVIRONMENT AND RURAL AFFAIRS: COUNCILLOR REBECCA BREESE

Report Title	Kilsby Review Neighbourhood Development Plan
Report Author	Jane Parry, Senior Planning Policy Officer jane.parry@westnorthants.gov.uk

Contributors / Checkers / Approvers		
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Director	Stuart Timmiss, Executive Director Place, Economy & Environment	13/05/22
Legal	Theresa Boyd	30/05/22 & 31/05/22
Head of Communications	Becky Hutson, Marketing and Communications Manager	13/05/22

List of Appendices

Appendix 1 – Proposed Decision Statement including Table A, Examiner’s recommended modifications and further editorial changes to the Kilsby Review Neighbourhood Development Plan and actions to be taken

Appendix 2 – Map of Kilsby Neighbourhood Area

1. Purpose of Report

- 1.1 For members to consider the recommendations of the independent Examiner following the examination of the Kilsby Review Neighbourhood Development Plan (Kilsby Review NDP).

2. Executive Summary

- 2.1 The report summarises the process which has been followed to produce the Kilsby Review NDP and presents the outcomes of the independent examination, including the Examiner's recommendations. It recommends that the Kilsby Review NDP is "made" subject to a number of modifications.

3. Recommendations

- 3.1 It is recommended that Planning Policy Committee:
- a) Notes and welcomes the progress in making the Kilsby Review NDP by the Kilsby community.
 - b) Accepts the Examiner's recommended modifications in respect of the Kilsby Review NDP.
 - c) Approves the proposed decision statement to "make" the Kilsby Review NDP set out in Appendix 1, subject to recommendation b) and any necessary factual alterations.
 - d) Agrees that on being "made", the Kilsby Review NDP will replace the Kilsby NDP which was made in 2016.
 - e) Agrees that delegated authority be given to the Interim Head of Planning and Climate Change Policy to make further minor editorial changes to the Kilsby Review NDP to address any factual and typographical errors and to reflect the fact that the document will be in its intended final form.

4. Reason for Recommendations

- 4.1 In order for a Neighbourhood Development Plan (NDP) to be "made" (adopted) the Neighbourhood Planning (General) Regulations 2012 (SI 2012 No. 637) require the council to make a decision on the Examiner's recommendations.

5. Report Background

- 5.1 The Localism Act 2011 introduced three types of neighbourhood planning including Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build.
- 5.2 Neighbourhood Development Plans ("NDPs") is a plan making power allowing local communities to shape development in their area. When "made" (or adopted), NDPs form part of the development plan alongside the Council's Part 1 and Part 2 Local Plans.
- 5.3 The Neighbourhood Planning Regulations 2012 set out the statutory process a qualifying body (QB) (a parish council, town council or forum) must follow when preparing a NDP or order, following designation of a neighbourhood area.
- 5.4 A draft NDP is drawn up and consulted on by the QB and then submitted to the local planning authority for further formal consultation. This is followed by an examination undertaken by an independent examiner, who makes recommendations. In the case of a review or modified NDP the recommendations can be that the plan can be made unchanged or that it can be made with

- certain modifications. The local planning authority (West Northamptonshire Council (WNC)) must consider whether to accept the Examiner's recommendations. In doing so, the council must decide if, with the proposed modifications, the plan would meet the basic conditions and would not contravene convention rights or European Union obligations.
- 5.5 There would need to be a good reason not to accept the Examiner's recommendations and the greater the divergence of WNC's decision is from the recommendations the stronger the justification would need to be.

6. Issues and Choices

- 6.1 Plan preparation
- 6.2 Kilsby Parish Council (KPC), as the QB, applied for the designation of a neighbourhood area covering the whole of Kilsby Parish on 4 July 2013. The council refused the application and instead designated a neighbourhood area on 6 December 2013 that excluded the area occupied by the Daventry International Rail Freight Terminal (DIRFT) (see map in Appendix 2). Following consultation under Regulations 14 and 16 and subsequent examination in 2015 and referendum in 2016, the Kilsby NDP was made on 22 July 2016.
- 6.3 In 2021 KPC decided to review the NDP and submitted a number of documents to the council in August 2021. This comprised the made NDP with tracked changes, a draft modified NDP and a statement of modifications setting out the reason for each change and an opinion on the nature of the change. National Planning Policy Guidance was reviewed in 2019 and introduced the following categories of changes or modifications:
- Minor (non-material) modifications to a neighbourhood development plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document, and would not require examination or a referendum.
 - Material modifications which do not change the nature of the plan or order would require examination but not a referendum. This might, for example, entail the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which, subject to the decision of the independent examiner, are not so significant or substantial as to change the nature of the plan.
 - Material modifications which do change the nature of the plan or order would require examination and a referendum. This might, for example, involve allocating significant new sites for development.
- 6.4 KPC concluded that the changes were material but not so significant or substantial as to change the nature of the plan (the middle bullet point above). Officers agreed with this view and the council issued a confirmation letter to KPC. This meant that the Kilsby Review NDP had to be subject to formal consultation under Regulations 14 and 16 and independent examination.
- 6.5 A draft Kilsby Review NDP was published by KPC for the Kilsby neighbourhood area for Regulation 14 public consultation from 1 October to 15 November 2021. Following submission of the Kilsby Review NDP to the council on 14 January 2022 the plan was published for formal Regulation 16 consultation. The consultation period ran from 28 January to 11 March 2022.

With the agreement of KPC, the council appointed an independent Examiner, Christopher Collison BA(Hons) MBA MRTPI MIED IHBC, to review whether the plan met the basic conditions (see below).

6.6 NDPs are not tested for their soundness, but are tested to ensure they meet the “basic conditions” set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 which are that:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.
- The making of the neighbourhood plan contributes to the achievement of sustainable development.
- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
- The making of the neighbourhood development plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007) (either alone or in combination with other plans or projects).

6.7 Examination outcomes

6.8 The Examiner’s report on the Kilsby Review NDP was received in May 2022 and has been published on the council’s website. In his report, the Examiner concludes that, subject to a number of modifications, the plan has met all the legal requirements and should be “made”. He noted that the NDP has been underpinned by community support and engagement. The examiner also confirmed that the modifications contained in the Kilsby Review NDP do not change the nature of the development plan and would therefore not require a referendum.

6.9 A schedule of the Examiner’s recommendations is set out in table 1 to the proposed decision statement, which is appendix 1 of this report. Most of the changes are minor and necessary for clarity, accuracy and to ensure they are in accordance with national planning policy. More significant changes are:

- Amending policy K3 “Design of new development” to ensure that it is applied proportionately to development according to its scale, nature and location
- Clearer reference to relevant parts of the Kilsby Design Code in policy K3.
- Inclusion of the Kilsby Design Code as an appendix to the Review NDP. However, it should be made clear that as a whole the Code does not form part of the statutory development plan. Where specific principles are referred to in policies and supporting text (K3 Design of new development and K5 “Built heritage”) they do form part of the development plan.
- Removal of four “important views” because they have not been sufficiently well evidenced (relevant to policy K5 “Built heritage”).
- Amending policy K6 “Character, form and setting” and supporting text to more accurately explain that one area of ridge and furrow is a non-designated heritage asset and to afford the significance and views of it appropriate policy protection.

6.8 The Examiner included as a final modification that it would be appropriate for the council and QB to be able to modify general text, figures and images to achieve consistency with his recommended modifications and achieve updates and correct identified errors. The recommendations made by the Examiner, the reasons for them and what action is proposed in response to each of these is set out in table 1 to the proposed decision statement. The changes proposed by the council to correct errors and make factual updates are marked as “accuracy changes” in table 1. It is considered that the recommended modifications (including accuracy changes) should be approved to ensure that the NDP meets the basic conditions.

6.9 Decision making process

6.10 The council is required to issue its final decision on the NDP within five weeks of receiving the Examiner' report, unless the council and QB agree a different date. In the case of the Kilsby Review NDP, the final examiner's report was received on 11 May 2022, meaning that a decision would have to be issued by 16 June 2022 unless a different date is agreed. On 11 May 2022 KPC confirmed agreement to an extension of time to allow this decision to be made at Planning Policy Committee on 28 June 2022.

6.11 Making the Plan

6.16 The Examiner recommended that the Kilsby Review NDP should be made, subject to the modifications put forward. He determined that a referendum is not required. The decision statement and adoption notice will be issued on 6 July 2022. The Review NDP will replace the first Kilsby NDP made in 2016.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 A referendum is not required. Printing of the small number of deposit copies of the made plan which will be met from existing resources.

7.2 Legal

7.2.1 In accordance with the Neighbourhood Planning Regulations 2012 (Regulation 17A) the council is required to consider the report of the independent examiner and decide what actions to take in response to each recommendation. It must also decide what modifications to make.

7.3 Risk

7.3.1 There are no significant risks arising from the proposed recommendations in this report.

7.4 Consultation

7.4.1 The council and Kilsby Parish Council have been informing and engaging residents throughout the process, through informal and formal public consultations.

7.5 Consideration by Overview and Scrutiny

7.5.1 Not applicable.

7.6 Climate Impact

7.6.1 The NDP does not specifically address climate change. However, the implementation of a number of its policies concerned with protecting the natural, built and historic environment will in combination, help to contribute to reduce the impact of climate change.

7.7 Community Impact

7.7.1 The Kilsby Review NDP has been subject to formal and informal consultation in accordance with the Neighbourhood Planning (General) Regulations 2012. A consultation statement was produced by the QB which sets out the consultation and engagement activity undertaken, what comments were received and how the plan responded to these.

8. Background Papers

8.1 Kilsby Review Neighbourhood Development Plan – Submission Draft

8.2 Report of the independent Examiner into the Kilsby Review NDP, May 2022

Appendix 1 – Proposed Decision Statement
Kilsby Review Neighbourhood Development Plan
Decision Statement
Regulation 18 and Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

1. Summary

- 1.1 Following an independent examination, West Northamptonshire Council (the “council”) has considered all of the information available and is publishing its decision to “make” the Kilsby Review Neighbourhood Development Plan. The reviewed neighbourhood plan was not subject to a referendum, the reasons for which are outlined later in this decision statement.

2. Background

- 2.1 Kilsby Parish Council, as the qualifying body, applied for Kilsby Parish to be designated as a neighbourhood area on 4 July 2013. The council refused the application and instead designated a neighbourhood area on 6 December 2013 that excluded the area occupied by the Daventry International Rail Freight Terminal (DIRFT). Following Regulations 14 and 16 consultation and subsequent examination in 2015, the Kilsby NDP was made on 22 July 2016.
- 2.2 The draft Kilsby Review Neighbourhood Development Plan was published by Kilsby Parish Council for public consultation from 1 October to 15 November 2021.
- 2.3 Following submission of the Kilsby Review NDP to the council on 14 January 2022 the plan was published by the Council for consultation. The consultation period ran from 28 January to 11 March 2022.
- 2.4 With the agreement of Kilsby Parish Council, the Council appointed an independent Examiner, Christopher Collison BA(Hons) MBA MRTPI MIED IHBC, to review whether the plan met the basic conditions required by the legislation and whether the changes in the Review Plan are significant as to require just examination or more significant to require examination and referendum.
- 2.5 Following the examination, the Examiner’s report was completed on 11 May 2022 and made available on the council’s website. The report concludes that subject to the making of the modifications recommended in his report the plan meets the basic conditions set out in legislation and should be made. The Examiner also determined that a referendum was not required.

3. Decision and Reasons

- 3.1 The council has made the modifications proposed by the Examiner, to ensure that the plan meets the basic conditions. Table A below sets out these modifications and the action taken in respect of each of them. Depending on the recommended change, these are illustrated differently in the Decision Statement and set out below:
- Modifications of wording by the Examiner are shown as **bold** or ~~strikethrough for deletions~~.

- Where the Examiner has not recommended specific wording and the council has had to interpret the recommendation and identify specific wording this is double underlined or ~~strikethrough for deletions~~. This includes accuracy changes.
- 3.2 The Examiner has concluded that with the specified modifications the Kilsby Review Neighbourhood Development Plan meets the basic conditions and other relevant legal requirements. The council concurs with this view.
- 3.3 As per the determination of the Examiner, the Kilsby Review Neighbourhood Development Plan can proceed to be “made” without a referendum.
- 3.4 In accordance with the Regulations, the Kilsby Review Neighbourhood Development Plan is “made” and planning applications in the Kilsby neighbourhood area must be considered against the Kilsby Review Neighbourhood Development Plan, as well as existing planning policy.
- 3.5 This decision statement and copies of the Kilsby Review Neighbourhood Development Plan and its supporting documentation, including the Examiner’s report are available to view on the council’s website at:

West Northamptonshire Council Daventry Area – submitted neighbourhood plans

- 3.6 Hard copies of this decision statement and the modified version of the neighbourhood plan are available for inspection at the following locations:
- West Northamptonshire Council, Daventry Area Offices (Lodge Road, Daventry, NN11 4FP)
 - Kilsby Village Store, Red Lion Car Park, 26 Main Road, Kilsby CV23 8XP
 - St Faith’s Church porch, Church Walk, Kilsby CV23 8XZ

Table 1 Examiner's Recommended Modifications and further editorial changes to the Kilsby Review Neighbourhood Development Plan and actions to be taken (set out in plan order)

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
1	p10, para 1.11	N/A	<p>1.11 The Draft NDP Review was therefore published for 6 weeks formal consultation (Regulation 14). The Modified Plan has been <ins>was</ins> revised further following consideration of the responses, for submission to West Northamptonshire Council. The Council will undertake <ins>undertook</ins> a further 6 weeks formal consultation (Regulation 16), and after which the NDP will <ins>proceeded</ins> to examination.</p> <p>1.12 The independent Examiner will <ins>produced</ins> his final report in May 2022 in which he <ins>considered</ins> that with modifications, the Review NDP <ins>should be made</ins>. He also determined whether or not that</p>	To ensure it is accurate and factually up to date.	Make the suggested minor modification.

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
			<u>a Referendum is was not required. West Northamptonshire Council agreed to make the Review NDP at Planning Policy Committee on 28th June 2022. The Kilsby Review NDP replaces the Kilsby NDP which was made in 2016.</u>		
2	p19, Objective 3 (para 52 of Examiner's report)	<p>Revise Objective 3 as follows:</p> <p><u>To ensure that the significance of the historic buildings and environment of the village is sustained and documented and that the village's green spaces, green field boundaries, and, in particular, the ridge and furrow fields, are protected and maintained for the benefit of future residents and the national heritage.</u></p> <p><u>To ensure that development proposals affecting the heritage and natural environment assets of the village, including green</u></p>	N/A	To ensure that the objective is in accordance with the NPPF.	Amend Objective 3 in accordance with Examiner's recommendations.

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		<u>spaces, green field boundaries and ridge and furrow fields are considered having regard to the scale of any harm or loss proposed and the significance of the asset.</u>			
3	p19, Objective 7 (para 52 of Examiner's report)	<p>Revise Objective 7 as follows:</p> <p>To ensure that the village infrastructure does not lag behind development and that developers contribute, <u>including</u> through the Community Infrastructure Levy (CIL) towards improved and new village infrastructure. In particular to ensure that the village has reliable service from the utilities and mobile phone companies, dedicated medical facilities, and improved transport links.</p>	N/A	To acknowledge that developer contributions may arise from mechanisms other than CIL.	Amend Objective 7 in accordance with Examiner's recommendations.
4	p24 Policy K1 (para 73 of Examiner's report)	<p>Revise part 3 of policy as follows:</p> <p>3. In particular proposals for the development of a new building or the sensitive conversion of an</p>	N/A	To provide a basis for determining development proposals.	Amend policy in accordance with Examiner's recommendations.

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		existing building to accommodate the village shop will be <u>encouraged supported</u> . Such proposals should be sensitively designed and be fully accessible to all.			
5	p26 Policy K2 (para 78 of Examiner's report)	Revise part 1 of policy as follows: 1. Proposals to improve accessibility for walking and cycling and enhancement of routes linking residential areas to community facilities, <u>the and the</u> village centre, and <u>towards</u> nearby towns and villages will be supported. A list of proposed routes for improvements to walking and cycling routes is provided Appendix V: Community Infrastructure Projects.	N/A	To bring clarity required by NPPF.	Amend policy in accordance with Examiner's recommendations.
6	p30 Policy K3 (para 106 of Examiner's report)	Revise policy as follows: 2 nd para: <u>All development Proposals throughout the neighbourhood area should have demonstrate</u>	N/A	To enable the policy to be applied proportionately and to bring clarity required	Amend policy in accordance with Examiner's recommendations.

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		<p>regard to <u>for the following principles of the Kilsby Design Codes in a proportionate way according to the scale, nature and location of development:</u> and demonstrate how they have addressed the detailed principles of the codes in their designs. In particular, proposals should:</p> <ol style="list-style-type: none"> <li data-bbox="635 833 1072 1029">1. Protect the natural environment and mitigate against any loss of demonstrate a net gain in biodiversity (part of Code 1); <li data-bbox="635 1029 1072 1323">2. Demonstrate that they are responding to climate change. by incorporating the highest possible standards of insulation and energy conservation will be supported in line with (part of Code 1) – Sustainability and Climate Change. <li data-bbox="635 1323 1072 1455">3. Consider and minimise any impacts on views in accordance with Code 2 – Landscape, Views 		by NPPF for determining development proposals.	

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		<p>and the Settlement Edge. Where development proposals are on the settlement edge <u>should be designed so that the spacing of buildings will offer long glimpsed views to the surrounding landscape and achieve a suitable transition between built and rural environments.</u>, schemes should be of a lower density than the rest of the settlement.</p> <p>Where appropriate, access to the network of existing public rights of way surrounding the village should be provided. Grass verges and amenity green should be protected <u>(part of Code 2)</u>.</p> <p>4. Where they are for housing, be of a The height and scale of proposed new homes should be which is sympathetic to the character of their setting, the surrounding area in accordance with Code 3 Building Design.</p> <p>Development should have a maximum height of two storeys</p>			

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		<p>but may include an additional storey within the roof space with sky lights and/or gable end windows. Scale should be informed by adjacent dwellings.</p> <p>There should be variations in orientation and rigid layouts where buildings are clustered very formally should be avoided (<u>part of Code 3</u>).</p> <p>5. Include materials informed by the local vernacular in line with Code 3 – Building Design. Traditional materials prevalent in Kilsby includeing ironstone, sandstone, local red brick, limestone, render and painted brick with slate. Thatched roofing <u>will be supported</u> (<u>part of Code 3</u>); is frequently used on older cottages and where feasible could continue to be used in the future.</p> <p>6. <u>Wherever possible p</u>rovide off-road parking. and boundary treatments in line with Code 4 – Parking, Gardens and Boundary</p>			

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		<p>Treatments. On street parking as the only means of parking should be avoided. Where on- Any on-road street parking is delivered, it should be provided in the form of small groupings with appropriate landscaping.</p> <p>Back gardens should be of sufficient size to provide reasonable and useable amenity space. When rear boundaries Boundary materials should be in keeping with their setting and where they about the settlement edge, surrounding landscape or open green spaces, boundaries should be formed of hedgerows and trees <u>(part of Code 4)</u>. should be used.</p> <p>7. In addition, developments Development proposals should provide safe access for all and be accessible to local facilities by walking and cycling. Schemes should also demonstrate consideration of 'Secured by Design' principles.</p>			

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		8. Where new <u>homes</u> housing development adjoins the M45, A5 or A361 a noise buffer should be provided using planting or fencing. Where development is adjacent to the A5 or A361 this buffer should be appropriately designed to avoid a fortress appearance.			
7	Para 106 of Examiner's report	Include the Kilsby Design Code as an appendix to the Review Neighbourhood Plan and clearly state: "The Design Code does not form part of the statutory Development Plan. Where specific principles are referred to in Policy K3, and with respect to the Kilsby Conservation Area in Policy K5, of the Review Neighbourhood Plan they do form part of the statutory Development Plan"	N/A	For ease of reference to users of the Review NDP.	Include the Kilsby Design Code as an appendix in accordance with Examiner's recommendations.
8	p34 policy K4 (para 106 of Examiner's report)	Revise part 3 of policy as follows: 3. In line with the West Northamptonshire Joint Core	N/A	To provide the clarity required by the NPPF for determining	Amend policy in accordance with Examiner's recommendations.

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		<p>Strategy (H2), the tenure mix of affordable housing should reflect local housing need and viability on individual sites. Affordable housing will be sought for schemes in line with Policy HO8 – Housing Mix and Type Parts B i and B ii in the Settlements and Countryside Local Plan (Part 2). Where affordable housing is proposed there will be a preference for this should be affordable housing for rent from a registered provider <u>unless this is demonstrated not to be deliverable.</u></p>		development proposals.	
9	p38 Policy K5 (para 128 of Examiner's report)	<p>Revise policy as follows:</p> <p>1. Development proposals must conserve designated and non-designated heritage assets and their settings in a manner appropriate to their significance.</p> <p>3. Development proposals <u>within or affecting the setting of</u></p>		To ensure that the policy is in accordance with the NPPF.	<p>Amend policy in accordance with Examiner's recommendations.</p> <p>Consequential change to re-number views in Table 2.</p>

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		<p><u>the Kilsby Conservation Area</u> should respond positively to the established form, scale, design and materials used within the conservation area as highlighted in the <u>Kilsby Conservation Area Appraisal and Management Plan</u> <u>SPD Appraisal</u> and <u>Kilsby Design Codes</u> <u>unless an alternative approach is clearly demonstrated to be appropriate.</u></p> <p>5. 'Important views' 2, 7, 8, 9, 10 and 11 identified within the CAAMP (<u>see Map 5 Kilsby Conservation Area, Important Views and Vistas and Heritage Assets in Appendix 1 Map 2: Kilsby Review NDP Policies Map and Map 2A Kilsby Review NDP Policies – Village Inset</u>) are all views within, into and out of the conservation area <u>and should be sustained and enhanced the significance of which should not be significantly adversely</u></p>		<p>by the NPPF for determining development proposals.</p> <p>Consequential change to re-number sequentially the important views.</p>	<p>To provide the clarity required by the NPPF for determining development proposals.</p>

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		<u>affected by development proposals</u> and any adverse impacts mitigated through detailed designs.			
10	p66 Map 5 (para 128 of Examiner's report)	<p>Modify Map 5 so that important view reference numbers 2, 7, 8, 9, 10, and 11 are more clearly identifiable.</p> <p>Alternatively, an approach to rely on the Policies Map rather than Map 5 would be equally satisfactory.</p> <p>Delete other important views and vistas numbered 1,3, 5, and 6.</p>	N/A	<p>To provide the clarity required by the NPPF for determining development proposals.</p> <p>The quality and importance of views 1, 3, 5 and 6 are not sufficiently well evidenced.</p>	Amend NDP Map 2 in accordance with Examiner's recommendations and delete views from Map 5.
11	P41, policy K6 (para 136 of Examiner's report)	<p>Revise policy as follows:</p> <p>2. Development outside the existing confines of Kilsby village, should be appropriate to the open countryside and seek to sustain the character and</p>	N/A	<p>To ensure that the policy is in accordance with the NPPF in respect of an area of ridge and furrow</p>	<p>Amend policy in accordance with Examiner's recommendations.</p> <p>Add Viewpoint 4 to Map 2 Kilsby Review</p>

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		<p>setting of the village and local landscape, including any areas of archaeological significance.</p> <p><u>3. Areas of ridge and furrow identified as significant through policy documents or the planning process should be sustained and enhanced.</u></p> <p><u>Development proposals directly or indirectly affecting the significance of ridge and furrow fields must demonstrate appropriate consideration of the significance of the heritage asset, and detail the scale of harm or loss.</u></p> <p><u>Development proposals affecting views of the ridge and furrow fields north of the village (identified as a non-designated heritage asset through the Conservation Area Appraisal and Management Plan SPD) seen from viewpoint 4 identified on Map 5 should minimise any adverse impact on those views.</u></p>		<p>identified as a non-designated heritage asset and to afford it appropriate protection.</p> <p>To provide the clarity required by the NPPF for determining development proposals.</p>	<p>NDP Policies Map and Map 2A Kilsby Review</p> <p>NDP Policies Map Village Inset</p>

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		An alternative approach to rely on the Policies Map rather than Map 5 would be equally satisfactory.			
12	P39, para 4.3.10	<p>Modify paragraph 4.3.10 of the supporting text to more accurately explain that an area of ridge and furrow north of Rugby Road is included in the Local List.</p> <p>4.3.10 The surrounding countryside is protected by Daventry Settlements and Countryside Local Plan (Part 2) Policy RA6 – Open Countryside. However the ridge and furrow fields, of which there are particularly fine examples on the northern boundary of the village have no formal, specific protection. They The area around Kilsby village includes several ridge and furrow fields which are the remains of a medieval, open field system of</p>	N/A	Explanation of status of heritage asset will enable clarity required by the NPPF for determining development proposals.	Amend para 4.3.10 in accordance with Examiner's recommendations.

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		<p>farming far older than any village buildings standing today. This feature is rare, valued by residents as part of the village's heritage, and needs to be protected and preserved. <u>The Local List for Kilsby has been adopted by West Northamptonshire Council and this includes one area of ridge and furrow off Rugby Road. This specific area of ridge and furrow therefore has the status of a non-designated heritage asset.</u> This is shown in figure 35 (page 36) of the Kilsby Conservation Area Appraisal and Management Plan (CAAMP). The CAAMP identifies other areas of ridge and furrow, which are shown in Figure 17 (page 26), although they are not on the Local List. The CAAMP itself is an adopted supplementary planning document which is a material consideration in decision making. <u>The Kilsby Conservation</u></p>			

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
		Area Appraisal identifies several areas in the Parish and these around the village are shown on Figure 17 A map showing important open spaces within the village, TPOs (Tree Preservation Orders) and ridge and furrow. The Conservation Area Appraisal This sets out in Section 11.2 Threats and Recommendations the following in relation to ridge and furrow:			
13	P47, para K7 (para 146 of Examiner's report)	Revise policy as follows: The sites listed below and shown on Map 2 Kilsby Modified NDP Policies Map and Maps 6a, 6b, 6c, 6d, 6e and 6f in detail at Appendix III, are designated as Local Green Spaces. <u>Inappropriate development</u> of Local Green Space is ruled out other than in very special circumstances	N/A	To correct a typographical error.	Amend policy in accordance with Examiner's recommendations.

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
				by the NPPF for determining development proposals.	
14	Annex: Minor corrections to the Review Neighbourhood Plan" of Examiner's report	Modify policy explanation sections, general text, figures and images, and supporting documents to achieve consistency with the modified policies, and to achieve updates and correct identified errors.	<p>Executive Summary Revise penultimate para as follows:</p> <p>The NDP Policies are also supported by a number of actions to address issues related to <u>employment</u>, transport and infrastructure which lie beyond the role of neighbourhood plan policies.</p> <p>Chapter 4.0 Modified Neighbourhood Plan Policies, Revise 2nd para as follows:</p> <p>The Made NDP policies were prepared to address the issues and concerns of local residents in Kilsby and were identified through the formal and informal consultation processes undertaken as part of the preparation of the emerging</p>	To achieve consistency between policies and supporting text. For the avoidance of doubt.	Make the minor corrections as required in accordance with Examiner's recommendations.

Recommendation ID number	Page/Para/Policy reference in Submission Version of NDP and para in Examiner's Report	Examiner's Recommendation	Details of further editorial changes	Reason	Action to be taken
			<p>Plan. The policies have been through a process of review, and this has resulted in changes to some of the original policies in the made NDP <u>the deletion of one policy and one new policy. All the other policies have been subject to a degree of modification.</u></p> <p>Consultation Statement: Heading 4.0 should be corrected as follows: 15 October <u>16</u> November</p>	To correct a minor error.	



**West
Northamptonshire
Council**

Appendix 2 – Map of Kilsby Neighbourhood Area





WEST NORTHAMPTONSHIRE COUNCIL

PLANNING POLICY COMMITTEE

28th June 2022

Cllr Rebecca Breese, Strategic Planning, Built Environment & Rural Affairs

Report Title	North Northamptonshire Strategic Plan
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Report Author	Richard Wood, Interim Head of Planning and Climate Change Policy
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Contributors/Checkers/Approvers

West S151	Martin Henry	09 th May 2022
Director	Stuart Timmiss	Emailed 6 th May 2022
Communications Lead/Head of Communications	Becky Hutson	10 th May 2022
Legal	Theresa Boyd	06 th May 2022

List of Appendices

None

1. Purpose of Report

- 1.1 For members to consider a response to the consultation on the 'Scope and Issues' for the North Northamptonshire Strategic Plan. A copy of the [Scope and Issues report](#) can be seen on North Northamptonshire Council's (NNC) website.

2. Executive Summary

2.1 NNC is consulting on the first stage of the review of the Core Strategy that was adopted in 2016. This Council has been invited to respond to the consultation.

3. Recommendation

3.1 It is recommended that Planning Policy Committee:

- a) Agrees the suggested response to the consultation from North Northamptonshire Council as set out in paragraph 5.8.

4. Reason for Recommendations

4.1 To ensure that the Council responds to the consultation from the neighbouring North Northamptonshire Council.

5. Report Background

5.1 North Northamptonshire Council (NNC) has launched a consultation on the Scope and Issues that the new strategic plan for its area will need to address and is seeking views on whether or not they have identified the right issues.

5.2 The existing Core Strategy covers the period 2011 to 2031 and was adopted in 2016. Given the need to review plans every five years the council is now preparing a new plan, which will cover the period to 2041.

5.3 The Strategic Plan will focus on strategic matters which will, as a minimum, need to meet the requirement, set out in the National Planning Policy Framework (NPPF). The plan will also help deliver the priorities set out in other NNC plans and strategies, notably the Corporate Plan.

5.4 NNC has identified the following strategic priorities for the area that it expects to be within the scope of the plan, and states that these may be refined subject to any changes to national and sub-regional guidance and in response to consultation feedback:

- **The spatial vision for North Northamptonshire** – extended to 2050 to reflect the Oxford-Cambridge Arc Spatial Framework (ASF) and meet the requirements of the NPPF.
- **The approach to climate change** – setting the framework for the local response to the climate emergency, building on existing initiatives and setting priorities to deliver net zero carbon.
- **The approach to Levelling Up** – setting the framework for the local response to addressing inequalities and setting priorities to level up.
- **The spatial strategy for the distribution of development** – including the roles of settlements and the distribution of housing, employment, retail, leisure, and other commercial development. Cooperation will be needed with adjoining authorities and other relevant agencies to ensure cross boundary issues, including options for the longer-term growth of Northampton, Bedford and Peterborough are considered.
- **The housing requirement** – the number of new homes to be provided across North Northamptonshire and the distribution of these. Within this context, the size, type, and

tenure of housing needed for different groups will be identified, including addressing the proportion of the overall housing requirement that should be provided as affordable and planning for the needs of an ageing population.

- **Economic growth** – an economic vision to strengthen and diversify the economy of North Northamptonshire, taking account of existing sectoral strengths, opportunities provided by the Oxford-Cambridge Arc and implications of Covid-19, including changes to working patterns. An overall jobs target for North Northamptonshire, distribution of this and identification of new employment land capable of meeting a wide variety of needs.
- **Town Centres** - updated policy guidance and strategy for town centres and retail development taking account of the impact of policy changes and social/economic implications including Covid-19. This will focus on reimagining and redesigning town centres to support regeneration and economic recovery from Covid-19 including opportunities for town centres to become community service hubs with increased leisure and residential space.
- **Strategic Development Locations and Opportunities** – strategic sites that are key to the delivery of the spatial strategy will be identified in the plan. The location of these sites will be a key consideration in the context of climate-change related risks and ensuring future development contributes towards a reduction in carbon emissions. The plan will define clear development principles for these areas. These will provide the basis for design codes/frameworks.
- **Infrastructure** – key infrastructure projects that are required to deliver the strategy such as strategic transport schemes including active travel, utility networks, community facilities, health, emergency services infrastructure and site-specific requirements.
- **Place-making/sustainable development** – key principles to ensure high quality development that is sustainable and supports local communities. The design and future sustainability of development will be a key consideration in the approach to climate change and the Strategic Plan will set out a stronger approach to integrating land-use and transport considerations. This will include a review and refresh of the Protecting Assets policies in the JCS to ensure they are locally distinctive with increased emphasis on health and wellbeing. It may be necessary to harmonise the approach to open space/sports provision across North Northamptonshire and the broad criteria for the delivery of these.
- **Natural and Historic Environment** – key principles and measures to achieve environmental net gain including the protection, restoration, and enhancement of natural, and historic assets. This will include natural capital benefits such as flood protection, recreation and improved water and air quality as well as ensuring appropriate measures for internationally, nationally and locally designated sites and priority habitats or protected species. The Strategic Plan will seek to maximise the health and wellbeing benefits of nature and accessibility to it. Opportunities to enhance the green and blue infrastructure network within North Northamptonshire and maximise its wider benefits and opportunities will be set out. The spatial strategy and place-making approach will be influenced by the importance of the natural and historic environment including the role they play in creating local distinctiveness.

5.5 As noted above, the plan is required to meet the housing need over the plan period. Using the current LHN approach the consultation document identifies a requirement for 35,680 houses. Existing commitments amount to 35,308 houses leaving a requirement for just 372 dwellings. However, all plans need to provide some level of contingency to provide for unexpected delays in delivery on some sites, and therefore the Council will need to determine what level of contingency should be provided for in the next stage of the plan.

5.6 The timetable for the next stages of the plan making process is identified as follows:

- Options Consultation – November 2022
- Draft Plan Consultation – June 2023
- Publication Plan Consultation – November 2023
- Examination – September 2024
- Adoption – September 2025

5.6 The closing date for this consultation was 23rd May. This is the first available committee to consider the Council's response. Officers at NNC are aware of this and are content to accept a late response. Following the resolution of this committee, the response will be submitted.

5.7 The plan is at an early stage and nothing in the documentation has been identified as a cause for concern. The scope of the plan is similar to the scope of the plan for West Northamptonshire, nothing has been identified as missing.

5.8 It is suggested that the following response be made to North Northamptonshire Council:

West Northamptonshire Council is pleased to have been consulted on the first stage of the plan and:

- welcomes the progress being made by NNC in reviewing its Core Strategy
- invites further dialogue from NNC as its plan progresses, particularly if it intends to include any proposals in the plan that would impact on the West Northamptonshire area.
- Confirms that it does not have any concerns about the content of the Scope and Issues document

6. Issues and Choices

6.1 The Council could decide to provide a different response to that included in paragraph 5.8, or choose not to respond at all. However, the Council is required to comply with the duty to co-operate and, whilst no duty to co-operate matters have been identified, it seems sensible that a response be made.

7. Implications (including financial implications)

7.1 Resources and Financial

7.1.1 There are no financial implications arising from this report.

7.2 Legal

7.2.1 There are no legal implications arising from this report.

7.3 Risk

7.3.1 There are no risks arising from the recommendations in this report.

7.4 Consultation

7.4.1 No implications.

7.5 Consideration by Overview and Scrutiny

7.5.1 Not applicable

7.6 Climate Impact

7.6.1 There are no climate change impacts arising specifically from this report. The consultation document identifies climate change as an area that the plan will need to deal with.

7.7 Community Impact

7.7.1 There are no community impacts arising specifically from this report.

7.8 Communications

7.8.1 None directly arising from this report.

8. Background Papers

8.1 'Scope and Issues' consultation for the North Northamptonshire Strategic Plan.

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WEST NORTHAMPTONSHIRE COUNCIL

PLANNING POLICY COMMITTEE

28th June 2022

Cllr Rebecca Breese, Portfolio Holder for Planning, Built Environment and Rural Affairs

Report Title	Community Infrastructure Levy – Discretionary Relief for Social Housing
Report Author	Richard Wood, Interim Head of Planning and Climate Change Policy

Contributors/Checkers/Approvers

West 151	Martin Henry	Emailed 10 th June 2022
Director	Stuart Timmiss	Emailed 10 th June 2022
Communications Lead/Head of Communications	Becky Hutson	10 th June 2022
Legal	Theresa Boyd	14 th June 2022

List of Appendices

None

1. Purpose of Report

- 1.1. To seek Members' approval to amend the Community Infrastructure Levy (CIL) regimes in place across West Northamptonshire to provide for Discretionary Social Housing Relief in respect of Discounted Market Sale housing.

2. Executive Summary

- 2.1 The current CIL regimes in place for West Northamptonshire include provisions for mandatory relief for most types of social housing, but they do not include discretionary relief for Discounted Market Sale housing, however this is recognised by the National Planning Policy Framework as an affordable housing product. This report seeks members approval to amend the regimes in place across West Northamptonshire to include this discretionary relief.

- 2.2 In order to allow this Relief the Council has to put in place a policy setting out what is required to qualify for this relief, including the criteria governing who is eligible to occupy the homes and how these will be allocated. The Council's Strategy and Partnership Team have prepared a policy position for Discounted Market Sale products. This guidance document provides the Council with a policy and procedure framework to determine the discounted value of a property and the eligibility criteria for intended purchasers.

3. Recommendations

- 3.1 It is recommended that the Planning Policy Committee:

- a) Agrees that the Community Infrastructure Levy regimes in place for West Northamptonshire be amended to include Discretionary Social Housing Relief for Discounted Market Sale housing.

4. Reason for Recommendations

- 4.1 To seek Members' agreement to amend the CIL regimes to allow for Relief for discounted Market Sale housing.

5. Report Background

- 5.1 The Community Infrastructure Levy (CIL) is a charge made on new developments to fund local infrastructure projects required as a result of new development. In West Northamptonshire, all three former councils adopted CIL prior to vesting day for the unitary council. In each area the charge only applies to new residential and retail development. Legislation specifies that CIL can only be charged where a development results in a net gain of 100 square metres of floor space or more.

- 5.2 CIL can be a substantial development cost and can therefore have a significant impact on development viability, especially for social housing schemes where margins are generally tighter. By way of an example a typical 3 bed house with a floor area of 93 square metres would incur a charge of approximately £23,000 in the south area (slightly higher in Daventry area and lower in Northampton). To mitigate this issue, mandatory relief from CIL exists for social rent, affordable rent, intermediate rent and shared ownership properties. This means that developers do not have to pay the levy on properties built for these tenures, providing they apply to the Council for relief as it isn't granted automatically.

- 5.3 In response to the introduction of First Homes the CIL Regulations were amended to allow relief for homes that are sold at no more than 70% of their open market value at their first and any subsequent sales. However, the definition of affordable housing in the National Planning Policy Framework (NPPF) includes other affordable housing models such as Discounted Market Sale (DMS) which can be sold at up to 80% of open market value and are therefore not covered by the amended Regulations. As such DMS properties would incur a CIL charge if delivered in West Northamptonshire. This harms the viability of delivering Discounted Market Sale homes and

therefore reduces the potential to include them in an affordable housing mix as part of affordable housing negotiations. In turn this reduces choice in the affordable housing market.

- 5.4 To address this issue, Local Authorities have the option of implementing Discretionary Social Housing Relief (DSHR). DSHR extends CIL relief to cover properties sold at up to a maximum of 80% of market price so they won't incur a CIL charge, subject to an application for relief being made to the Council.
- 5.5 It is recommended that Members agree to the introduction of the Discretionary relief.

6. Issues and Choices

- 6.1 The Council could decide to continue with its existing regimes, however this may result in DMS properties not coming forward, or not coming forward at the rate they would if Relief was introduced.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 If the DSHR is agreed to it would result in the loss of some income to the Council. It isn't possible to be precise about the number of properties that would come forward that would claim this relief, however based on current levels of interest it is anticipated that numbers would be small. Importantly the proposal would place the DMS product (which is recognised by the NPPF as an affordable housing product) on the same footing as the other affordable products.

7.2 Legal

- 7.2.1 The Community Infrastructure Regulations provide for the introduction of relief for DMS products (in particular regulation 49).

7.3 Risk

- 7.3.1 The removal of the need to pay CIL could result in schemes where DMS products are promoted by landowners and developers at the expense of other affordable products. It is considered that this could be managed by the use of housing needs evidence to ensure a suitable mix of products is provided.

7.4 Consultation

- 7.4.1 Prior to the CIL regime being introduced it went through consultation stages. This minor amendment to the regime does not require consultation.

7.5 Consideration by Overview and Scrutiny

7.5.1 Not applicable.

7.6 Climate Impact

7.6.1 There are no direct consequences of this report.

7.7 Community Impact

7.7.1 The approach would make the DMS product more viable and therefore extend the range of affordable products that will be made available across the area.

7.8 Communications

7.8.1 Subsequent amendments to the CIL regimes will be communicated to relevant stakeholders as and when required.

8. Background Papers

8.1 None



WEST NORTHAMPTONSHIRE COUNCIL

PLANNING POLICY COMMITTEE

28 June 2022

Cllr Rebecca Breese, Portfolio Holder for Planning, Built Environment and Rural Affairs

Report Title	South Northamptonshire Local Plan Part 2 – Employment Allocations Supplementary Planning Document
Report Author	Alan Munn Planning Policy and Conservation Manager

Contributors/Checkers/Approvers

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Director	Stuart Timmiss	
Communications Lead/Head of Communications	Becky Hutson	By Email 08/06/2022
Legal	Theresa Boyd	By Email 16/06/2022

List of Appendices

Appendix A – South Northamptonshire Local Plan Part 2 – Employment Allocations Supplementary Planning Document.

Appendix B – Consultation and Engagement Strategy.

1. Purpose of Report

To seek Members' approval of the contents of the draft Employment Allocations Supplementary Planning Document and their agreement to undertake public consultation on the SPD.

2. Executive Summary

- 2.1 The South Northamptonshire Local Plan (Part 2) 2011-2029 was adopted in July 2020 and adds local context to the policies of the West Northamptonshire Joint Core Strategy Local Plan (Part 1) (WNJCS) which was adopted in December 2014 setting out the strategic policy position for the South Northamptonshire area.
- 2.2 Delivering appropriate new employment opportunities in both urban and rural areas is a key objective of the Part 2 Plan as is facilitating economic growth and encouraging investment and job creation. The Plan makes a number of employment allocations to support these objectives, these are detailed under Policies AL1 to AL5 of the Plan <https://www.southnorthants.gov.uk/downloads/download/698/local-plan-part-2-adoption-documents>
- 2.3 A draft supplementary planning document has now been prepared to ensure a positive approach to the development of the employment allocation, providing clarity and certainty to the public and developers whilst ensuring the wider sustainability objectives of the plan are also delivered.

3. Recommendations

- 3.1 It is recommended that the Planning Policy Committee:
 - a) Agrees the content of the draft South Northamptonshire Local Plan Part 2 – Employment Allocations Supplementary Planning Document.
 - b) Agrees that the Council should undertake a six week public consultation on the document.
 - c) Delegate authority to the Interim Head of Planning and Climate Change Policy to undertake minor editorial changes to the draft SPD including those in respect of paragraphs 1.14-1.22 and the details of the public consultation.

4. Reason for Recommendations

- 4.1 To seek Member's agreement to consult on a draft Supplementary Planning Document to ensure a positive approach to the development of the employment allocations of the South Northamptonshire Local Plan Part 2 and the delivery of the wider sustainability objectives of the plan.

5. Report Background

- 5.1 Supplementary Planning Documents (SPDs) build upon and provide more detailed advice or guidance on policies in an adopted local plan. They do not however form part of the development plan, nor can they introduce new planning policies. They are however a material consideration in decision-making and an important tool in helping deliver the policies of the development plan.

- 5.2 The South Northamptonshire Local Plan (Part 2) 2011-2029 was adopted in July 2020 and makes a number of employment allocations. These are detailed under Policies AL1 to AL5 of the Plan.
- 5.3 In February 2022 work commenced on the production of a draft SPD to help deliver the employment allocations of the South Northamptonshire Local Plan Part 2.
- 5.4 At its meeting of 27 January 2022 the Council's Strategic Planning Committee considered an application for the development of Local Plan Allocation AL3 (Tiffield Lane, Towcester). The committee resolved to approve that application and grant planning permission for the development. With matters already agreed in respect of AL3 and the Notice of Decision in the process of being issued the draft SPD does not consider or make recommendations in respect of that Local Plan Allocation.
- 5.5 Should it be adopted the SPD will be a material consideration in decision making and provide more detailed advice and guidance in line with the adopted policies in the development plan.
- 5.6 The draft SPD provides an analysis of the existing planning policy and socio-economic context against which the employment allocations should be considered before providing an assessment of allocated sites (AL1, AL2, AL4 and AL5) and the wider area in which they are located. It concludes by setting out a number of overarching design principles and providing a development framework for each of the four allocated sites. It is against these principles and frameworks that the future proposals for the sites should be considered.
- 5.7 In order to adopt a document as an SPD and for the document to have weight, the document must pass through a period of not less than four weeks formal consultation, in line with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 5.8 The Council's Statement of Community Involvement for the South Area (July 2020) also requires the Council to consult on SPD's for a minimum of four weeks and sets out the detailed requirements for how that consultation should be conducted. As consultation will commence during the 'holiday period' it is proposed that a six week consultation will take place on the draft SPD. A full Consultation and Engagement Strategy for the SPD can be found at Appendix B to this report.
- 5.9 All comments that are made during the consultation will be subsequently reported to this committee together with a recommendation about whether the final Supplementary Planning Document (with or without changes to it) should be adopted.

6. Issues and Choices

- 6.1 The Council could choose not to progress work on the SPD. However this could lead to uncertainty over the future development of the allocations and the design principles it is expected future development should align to.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 The draft SPD has been prepared using the existing budget of the Planning Policy Team.

7.2 Legal

- 7.2.1 The process for preparing SPDs is set out in Part 5 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

7.3 Risk

- 7.3.1 No risks arise from the content of this report.

7.4 Consultation

- 7.4.1 Consultation will be undertaken in line with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's own Statement of Community Involvement. Consultation will be on a technical document that needs to conform to specific standards and legal requirements in content and production.

7.5 Consideration by Overview and Scrutiny

- 7.5.1 Not applicable.

7.6 Climate Impact

- 7.6.1 There are no direct consequences of this report although the policies of the Development Plan and the guidance within the SPD promote the principles of sustainable development.

7.7 Community Impact

- 7.7.1 The SPD will provide clarity and certainty to the public in respect of the development and delivery of the local plan allocations.

7.8 Communications

- 7.8.1 A six week consultation will take place on the SPD. Support will be provided by the Communications Team to maximise engagement with the formal consultation process.

8. Background Papers

- 8.1 None



Employment Site Allocations Development Brief

Supplementary Planning Document (SPD)

June 2022



West
Northamptonshire
Council

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Page 175



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Introduction

1

1. Introduction

Background

1.1 It is the role of the development plan to ensure that there are sufficient employment sites identified which will support the ambitions for sustainable economic growth within the area. The Joint West Northamptonshire Core Strategy (Joint Core Strategy / Local Plan Part 1) covers the extent of the former Daventry District, Northampton Borough and the South Northamptonshire Council area and identifies the broad spatial distribution for employment land together with identifying strategic sites.

1.2 The South Northamptonshire Local Plan Part 2: Settlements and Countryside (Part 2 Local Plan), which was adopted in July 2020, supplements the strategic plan and ensures that local needs and aspirations can also be met. The Part 2 Local Plan fits within the strategic context of the policies in the Joint Core Strategy. Whilst the Joint Core Strategy is in the process of being reviewed, the review is at early stages and is not sufficiently advanced to take account of.

1.3 As part of the preparation of the Part 2 Local Plan, five employment sites were identified to enable employment generating development to meet localised employment needs which are not met by the Joint Core Strategy. The employment sites were identified to enable existing companies sufficient opportunity to expand and also to provide opportunities for new companies to form.

1.4 The role of the five new employment sites is set out in paragraph 13.1.5 of the Part 2 Local Plan:

- Meet local demand and strengthen the rural economy;

- Provide the ability to strengthen local supply chains;
- Local flexibility and choice of locations;
- Meet the demand for small and medium sized units; and
- Contribute to reducing the level of out commuting.

1.5 The purpose of these very clear roles is to ensure they meet local demand and are complementary to the 65 business parks already existing across the South Northamptonshire area as well as the strategic employment sites at the Motorway junctions and at Silverstone.

1.6 The five sites subsequently allocated for employment in the Part 2 Local Plan are:

- Policy AL1: Land at Bell Plantation, Towcester
- Policy AL2: Land at Woolgrowers Field, Towcester
- Policy AL3: Land at Tiffield Lane, Towcester
- Policy AL4: Land at Shacks Barn, Whittlebury
- Policy AL5: Land at Former Furtho Pit, Old Stratford / Cosgrove.

1.7 Sites AL1 - AL3 are located to the north of Towcester and are well connected with good accessibility to the M1 to the east, M40 to the east and is at the crossroads of the A5 & A43. The sites were identified to facilitate some additional small scale employment opportunities to provide additional choice and opportunity for the growing population associated with the strategic development site to the south of the town. They were also identified to address people commuting from

Towcester elsewhere for employment purposes.

1.8 Site AL4 is known as the Shacks Barn Farm site and is located on the boundary of the Parishes of Silverstone and Whittlebury. There are already businesses operating from the wider site. However the allocation seeks to extend the existing business park to allow for a range of small and medium sized business units.

1.9 Site AL5 is Furtho Pit which is located east of the A5 / A508 junction at Old Stratford / Cosgrove. A small part of the site has previously benefited from planning permission and the remaining area has a mixture of farmland and a derelict former gravel pit. The site provides an opportunity for high visibility on a site of poor environmental quality. Regard must be had to the existing residential properties surrounding the site as well as the heritage assets in the area. There is also an opportunity to create a country park and the canal route must also be protected.

1.10 At its meeting of 27 January 2022 the Council's Strategic Planning Committee considered an application for the development of Local Plan Allocation AL3 (Tiffield Lane, Towcester). The committee resolved to approve that application and grant planning permission for the development. With matters already agreed in respect of AL3 and the Notice of Decision in the process of being issued the draft SPD does not consider or make recommendations in respect of that Local Plan Allocation. Any revised applications for AL3 will have to comply with the parameters set out in that consent.



1.11 The details of planning applications relating to the remaining four employment sites are set out under each of the site descriptions (refer to items 1.32-1.47). The planning applications will be considered in accordance with the development plan and any other material considerations. These active discussions have been recognised but this SPD has been prepared without any pre-determination of these planning applications.

Purpose

1.12 Barton Willmore, now Stantec has been commissioned by West Northamptonshire Council to produce a Supplementary Planning Document (SPD) to guide and support the future development of four of the five employment allocations AL1, AL2, AL4 and AL5.

1.13 The purpose of this SPD is:

- To improve the planning and development process by reducing uncertainty and providing landowners, developers and the wider community with clear guidance on what is expected from future developments;
- To provide a robust and clear development framework with clear, specific development principles to inform the preparation and determination of planning applications. This will ensure a comprehensive approach to the appropriate uses on the allocated sites in accordance with the development plan;
- To provide guidance ensuring that the evidenced land uses are appropriate to the wider context; and

- To raise design standards and the overall quality of development to create sustainable, exemplary places which are functional and respond to their surroundings.

personal data will be retained securely and in line with West Northamptonshire's retention guidelines.

How to get Involved

1.14 In line with the Council's Statement of Community Involvement, we now encourage everyone to get involved in the preparation of this draft SPD.

1.15 You can send responses in a number of ways, but we would like to encourage you to submit your views online via our consultation website:XXXX

1.16 This process should save you time and it will allow us to consider and process your comments more quickly. We hope you find this process quick and easy to use.

1.17 Comments can also be sent by email to: XXXX@westnorthants.gov.uk

1.18 A response form is also available for download from our website.

1.19 If you do not have access to the Internet, please respond in writing to: XXXXX

1.20 You can also call the Planning Policy Team with any questions, to request hard copies of the draft SPD or request further information at XXXXX

1.21 The draft SPD will be available for consultation between XXX and XXX. All comments should be submitted to us by 4.30pm, date 2022.

1.22 The Council will share details in line with XXX Privacy Notice and when required to do so by law and / statutory regulations. Any information and

Assessing Impacts

Sustainability Appraisal

1.23 A Sustainability Appraisal was undertaken for both the Joint Core Strategy and the Part 2 Local Plan. Owing to the scope of this SPD, there is no identified need to undertake a further Sustainability Appraisal.

Habitats Regulations Assessment

1.24 Habitats Regulations Assessment (HRA) is integral to the development of land use documents as it provides a statutory process to assess the potential impact on Natura 2000 sites. This was undertaken as part of the preparation of the Part 2 Local Plan. Owing to the scope of this SPD, there is no identified need to undertake an Appropriate Assessment.

Equality Impact Assessment

1.25 An Equality Impact Assessment allows us to assess any risk of discrimination. An EQIA was undertaken as part of the preparation of the Part 2 Local Plan and no issues were identified.

Health Impact Assessment

1.26 The development plan plays a key role in shaping the physical environment which can have a significant impact on health and well-being. The Part 2 Local Plan sets out the requirement for Health Impact Assessments. All major developments (10 or more dwellings or 1,000 or more square metres) will be expected to complete and submit a rapid HIA in order to determine if a more substantial HIA is necessary.

Site Locations and Descriptions

Site Locations

1.27 Of the four employment sites, two (AL1-AL2) are located to the north of Towcester along the A43, two of which front onto the Tove Roundabout which links the A43 with the A5. As the main link onto the A43, there is a mixture of commercial, office and light industry land uses near by.

1.28 AL4 is located in an important position adjoining the A43, southwest of Towcester, close to the Whittlebury junction and Silverstone.

1.29 AL5 is located at a prominent position adjoining the A5 and A508, adjacent to the settlement of Old Stratford and Cosgrove.

Figure 1 Sites AL1, AL2 and AL3



Figure 2 Site AL4



Figure 3 Site AL5



Policy AL1: Bell Plantation

1.33 Located to the north of Towcester on land associated with and including the Bell Plantation. The site provides circa 35 hectares (ha) for mixed employment generating development to reflect the need for diversity and resilience in the local economy as expressed in the Economic Growth Strategy.

1.34 A further 6 ha is identified for the creation of a home ground for Towcester Town Football Club. Employment uses are to be accessed from the A5 with a separate unfettered road access serving the football ground. The site must be served by good access by public transport including for pedestrians, cyclists and to enable bus penetration.

1.35 Detailed design must have regard to any non-designated and designated heritage assets, in particular the Easton Neston Grade II* Registered Park and Garden. A high-quality landscape setting is required by the allocation.

1.36 AL1 is currently subject to two live planning applications (WNS/2021/1819/EIA and WNS/2021/2168/MAO). The first planning application is hybrid with full detail for a roundabout access from the A5, the delivery of access for the Towcester Town Football Club a single warehouse and ancillary offices. The outline element is for the development of the Towcester Town Football Club and employment floor spaces for general industrial and storage and distribution uses with ancillary office spaces. The second planning application is outline for B2 and B8 buildings and principal access to the A5. The full description of development can be found on the Council's planning portal.



Policy AL2: Land at Woolgrowers Field, Towcester

1.37 Located to the north of Towcester, bound by the A5 to the east and Towcester Road & the A43 to the south. The site provides circa 4.5 hectares (ha) for mixed employment generating development to reflect the need for diversity and resilience in the local economy as expressed in the Economic Growth Strategy.

1.38 Employment uses are to be accessed from the A5 and / or Towcester Road. The site must be served by good access by public transport including for pedestrians, cyclists and to enable bus penetration.

1.39 Detailed design must have regard to any non-designated and designated heritage assets and in particular the Easton Neston Grade II* Registered Park and Garden. A high-quality landscape setting is required by the allocation.

1.40 AL2 is currently subject to an outline planning application (S/2020/2045/MAO) for industrial and commercial development including the potential for a car showroom, builders merchants and an emergency services hub. The full description of development can be found on the Council's planning portal.



Source: Google Maps

Policy AL4: Land at Shacks Barn, Whittlebury

1.41 Located at an important position adjoining the A43, southwest of Towcester, close to the Whittlebury junction. The site provides 10 hectares (ha) for mixed employment generating development to reflect the need for diversity and resilience in the local economy as expressed in the Economic Growth Strategy.

1.42 Employment uses are to use the existing access only off the A413. The site must be served by good access by public transport including for pedestrians, cyclists and to enable bus penetration.

1.43 Detailed design must have regard to any non-designated and designated heritage assessments and in particular the Easton Neston Grade II* Registered Park and Garden. A high-quality landscape setting is required by the allocation.

1.44 AL4 is currently subject to an outline planning application for mixed use employment use including research and development and industrial processes, general industrial and storage and distribution. The full description of development can be found on the Council's planning portal.



Policy AL5: Land at Former Furtho Pit, Old Stratford / Cosgrove

1.45 Located at an important position adjoining the A5 and the A508. The site provides 16 hectares (ha) for mixed employment generating development to reflect the need for diversity and resilience in the local economy as expressed in the Economic Growth Strategy.

1.46 Employment uses are to access from a new roundabout junction from the A508. The site must be served by good access by public transport including for pedestrians, cyclists and to enable bus penetration.

1.47 Detailed design must have regard to any non-designated and designated heritage assets, in particular the Scheduled Monument 1013660 'Motte and Bailey Castle' Deserted Village and Monastic Grange at Old Wolverton. Detailed consideration must also be had to the existing canal route including future needs and to the layout of the country park. A high-quality landscape setting is required by the allocation.

1.48 Whilst there has been no formal planning application for the site, the site has experienced some planning interest. A screening request for an Environmental Impact Assessment (EIA) was submitted (WNS/2021/1628/SCR) and following that an EIA Scoping (WNS/2021/1985/SCO). The Scoping Opinion was for 9 employment units for general industrial and storage and distribution with ancillary research and development, together with a country park and vehicular access from the A508. This indicates that a planning application is being prepared for the site. The full description of development can be found on the Council's planning portal.



How to use this document

1.49 This document is split into six key sections that together provide a clear and easy-to-use resource for those involved in the development of the four employment sites. Each section outlines contextual & site specific issues that should be considered in the development of each site. They should feed into and inform the assessment, evaluative and design work undertaken by applicants progressing each of the sites.

On the next page each of the sections are outlined, click on a wedge to jump to the corresponding section.





7. Exemplar Development

This section outlines the four key facets of a development where an exemplary approach should be taken, particularly if the market dictates the need for flexibility away from the SPD.

6. Assessment & Evaluation

A series of development frameworks that illustrate spatial parameters for each of the sites. These attempt to avoid a prescriptive, one-size-fits-all approach and are based on individual site assessments (included in this section), the Contextual Considerations and Landscape & Visual Assessment.

5. Design Principles

Outlining a series of non-spatial and overarching design principles that clearly express the need for a design-led approach to each of the four employment sites without dictating the form that development takes.

2. Planning Policy Context

Outlining the local policy context in relation to the four sites, from general policy relating to employment land to site-specific design briefs for each site. [A full version of the latter is included in the appendix.](#)

3. Contextual Considerations

Identifying some of the contextual considerations that need to be taken into account for each of the employment sites. It also establishes a definition for small, medium and large building/unit sizes, referenced throughout sections 5 and 6.

4. Landscape and Visual Consideration

Setting out a brief landscape and visual summary for each of the four employment sites. It includes a series of potential sensitive receptors that have informed the identification of 'Sensitive Areas' for each site in section 6.





Planning Policy Context

2

2. Planning Policy Context

Policy Context

2.1 Planning applications for the sites will continue to be determined against the relevant policies of the development plan together with any other material considerations. This SPD will be a material consideration in decision making and provide more detailed advice and guidance in line with the adopted policies in the development plan.

2.2 New planning policies can not be introduced via a SPD. Therefore, this section explains the existing policy context within which this SPD sits. Further information on the requirements for producing a SPD can be found in Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

2.3 There are no known Neighbourhood Plans which directly impact on the employment allocations AL1 to AL5. Therefore, the development plan for the sites is:

- Adopted West Northamptonshire Joint Core Strategy (2014)¹; and
- Adopted South Northamptonshire Local Plan Part 2: Settlements and Countryside (Part 2 Local Plan) (2020).

2.4 The Joint Core Strategy sets the strategic vision for economic development across the wider West Northamptonshire area. It is set out that a vibrant economy will strengthen communities, support sustainable development objectives and help reverse areas of decline.

2.5 The overarching employment strategy was, in part, set out in the Joint Core Strategy. **Policy S1** sets out the overarching distribution and also recognises that the development needs of the Rural Service Centres, including Towcester need to be provided for.

South Northamptonshire's Economic Growth Strategy

"The aim is to ensure a variety of job opportunities for local people and that people have access to local based educational facilities that can improve their employment prospects."

Joint Core Strategy

2.6 South Northamptonshire's Economic Growth Strategy has a date of 2016 – 2019. This sets the backdrop of the four employment allocations. The Strategy has 4 key interdependent priorities which guide development growth and supports the employment growth across the across South Northamptonshire. The themes are:

- **Theme One:** Improved Skills and Employment;
- **Theme Two:** Effective Business Support;
- **Theme Three:** Strengthening the Town and Village Economy; and
- **Theme Four:** Supporting the Visitor Economy.

2.7 The Economic Growth Strategy is to be updated in line with the new unitary authority's priorities and ambitions.

South Northamptonshire's Local Economic Assessment

2.8 In determining the appropriate policy direction for the Part 2 Local Plan, the evidence base informing the policies included the South Northamptonshire's Local Economic Assessment (May 2017). This Local Economic Assessment recommended that the policy direction for the Part 2 Local Plan was to increase the number of jobs so that its resident population could remain within the local area for work and help to increase spending within the associated settlements and thus contributing to their improved vitality and viability. The examining Inspector at the Part 2 Local Plan's Examination in Public agreed that the role of the four new employment sites is as set out in paragraph 13.1.5 to:

- Meet local demand and strengthen the rural economy;
- Provide the ability to strengthen local supply chains;
- Local flexibility and choice of locations;
- Meet the demand for small and medium sized units; and
- Contribute to reducing the level of out commuting.

2.9 Whilst this SPD will set out the contextual, landscape and visual analysis to inform the appropriate design parameters and guidelines for the individual sites, the overarching role of these four sites must also be taken into account.

¹ Joint Core Strategy Adoption | West Northamptonshire Council (westnorthants.gov.uk)

West Northamptonshire Joint Core Strategy (2014) (Local Plan Part 1)

2.10 The adopted **Joint Core Strategy** covers the former administrative areas of Daventry District; Northampton Borough and South Northamptonshire. The area is now covered by West Northamptonshire Council. The Joint Core Strategy sets out the long-term vision and objectives for the plan period up to 2029 and includes strategic policies to steer and shape development.

2.11 Owing to the area's strategic connections particularly by road and rail, there is a recognition that the area is attractive to the warehouse and storage industry. Whilst acknowledging it as an important economic sector, the Joint Core Strategy is concerned about an over reliance on one employment sector and therefore seeks to provide diverse employment opportunities to its residents.

2.12 In addition, there is a recognition that the rural economy must be supported and rural diversification is to be encouraged. This is to be supported by dynamic town and village centres. **Policy S1** sets out the general spatial distribution for development across the area.

2.13 In assessing the suitability of sites for development, priority will be given to making best use of previously developed land and vacant and under-used buildings in urban or other sustainable locations. This will contribute to the achievement of a

West Northamptonshire target of 30% of additional dwellings on previously developed land or through conversions.

2.14 Policy S8 sets the strategic direction for the distribution of jobs. Section 1 of the policy is relevant to Northampton and Section 2 of the policy is relevant to Daventry. Section 3 of policy S8 is of relevance to this SPD in setting the overall strategic context. The full policy, together with policies E7 and R2, can be viewed in the Joint Core Strategy as necessary.

2.15 The Joint Core Strategy also sets out narrative about jobs growth by sector. Whilst the job sectors are not policy, it does help to provide useful context around the economic aspirations of the Council which have helped to inform its policy direction.

- **Offices** – Settlements will need to maintain, renew and replace their stock of office development.

- **Manufacturing** – Some elements of manufacturing related to the high-performance technologies sector are growing but often means fewer employees due to successful mechanisation. Land requirements remain and may even require expansion.

- **Warehousing** – The area remains attractive to the warehouse industry and indications are that it is likely to remain so for the lifetime of the plan. However, delivering new space to cater for the warehousing sector on a trend-based trajectory would not be desirable nor sustainable in the long term in order to achieve a balanced economy.

- **Research and Development** – West Northamptonshire is driving up its educational standards across all of its towns and seeking new partnerships between higher educational providers and established business sectors for example at Silverstone circuit.

- **Non B Class** – non B class jobs include those in health care, retail, leisure, tourism, sport, education and cultural development. The non B class sector has grown in West Northamptonshire and the focus on town centres to provide more retail and service development to cater for the growing population will see this sector grow further. Tourism and leisure industries are important to both the rural and urban economies.

- **Green Economy** – supporting innovation and working with industry in the use and development of alternative energy sources and through design and build to ensure effective and efficient sustainable workplaces are also important initiatives.

2.16 As well as the economic aspirations, the importance of sustainable development is enshrined within the Joint Core Strategy. Alongside a presumption in favour of sustainable development, **Policy S10** sets out the sustainable development principles which apply to all development including that on allocated sites.

2.17 The Joint Core Strategy also sets out a strong desire to achieve modal shift (encouraging people to use public transport rather than their private motor vehicle) and to ensure that development sites are accessible by public transport

including walking and cycling opportunities. The overall approach is set out in Policy C1: Changing Behaviour and Achieving Modal Shift.

2.18 Overarching **Policy T1** recognises the role of Towcester as a rural service centre. The policy sets the overarching ambition for the town and there are secondary policies for each of the criteria which can be viewed in the Joint Core Strategy (see policies T2 to T5).

West Northamptonshire Strategic Plan

2.19 A review of the Joint Core Strategy is currently under way. The Strategic Plan will guide development in the period up to 2050. The West Northamptonshire Strategic Plan Spatial Options was consulted upon until 24 December 2021.

2.20 Whilst the Spatial Options consultation was the second consultation stage, no decisions have yet been made on the likely policy direction. The Local Development Scheme indicates that the Strategic Plan will be adopted by March 2024, there it is unlikely that no any weight as part of decision making will be afforded to this document.

Part 2 Local Plan

2.21 In line with the Joint Core Strategy, the **Part 2 Local Plan** allocates additional employment land to facilitate more local employment growth. The aim is to attract new investment and provide more jobs to match the skills of local people. Thus balancing the ratio of in and out commuting.

2.22 The allocated sites in the Part 2 Local Plan (paragraph 13.1.5) are intended to:

- Meet local demand and strengthen the rural economy;
- Provide the ability to strengthen local supply chains;
- Local flexibility and choice of locations;
- Meet the demand for small and medium sized units; and
- Contribute to reducing the level of out commuting.

2.23 The four employment sites are allocated by policies AL1, AL2, AL4 and AL5. All four of the allocations are to be accompanied and supported by an independent study providing market-led evidence on the proportion of B1 (offices), B2 (general industrial) and B8 (storage and distribution) uses to be delivered. The policy also allows some supporting uses that are demonstrably subservient and complementary in both scale and nature to the main B use class. The studies are to be undertaken by an independent expert and the scope of which should be agreed in advance with the Council.

2.24 The full design briefs for the four employment sites can be found in **appendix A**, as well as the Part 2 Local Plan.

Policy SS2: General Development and Design Principles

2.25 Alongside the requirements of Policies AL1, AL2, AL4 and AL5, general development and design principles are set out in Policy SS2 which covers requirements such as setting, materials and design, accessibility and water. Development proposals will be expected to meet the requirements of SS2. Owing to the purpose of this SPD, the overarching policy SS2 is of particularly relevance.

2.26 The policy approach set out within the development plan sets the context within which this SPD has been produced. The four sites at Towcester, Whittlebury and Old Stratford & Cosgrove have been allocated for employment uses which will strengthen the rural economy & local supply chains, provide local flexibility, meet the demand for small & medium sized units and contribute to reducing the level of out commuting.

2.27 This SPD has taken the policy requirements of the Joint Core Strategy and the Part 2 Local Plan into consideration including the general design policies. This together with understanding the site context, opportunities and constraints has resulted in the design principles for each of the sites.

2.28 The full policy SS2 can be found in **appendix B**, as well as the Part 2 Local Plan.

Socio-Economic Context

2.29 The 2011 Census reveals that the majority of residents (72%) live in the rural areas, 5% live within the urban fringe of Northampton with the remainder (23%) in the market towns.

2.30 The Halifax Quality of Life Survey (2017) ranked South Northamptonshire the 13th most desirable place to live in the country. It is prosperous with a highly skilled workforce, good education rates and low deprivation.

2.31 The 2011 Census shows the population of South Northamptonshire is just over 85,000; up 21,000 in 30 years and 7.5% in the last ten years. Since 1981 the proportion of the district's

population aged over 60 has increased by 90% with an increase of 40% since 2001 (an increase of South Northamptonshire Local Plan (Part 2) 16 6,025 people). Since 1981 the population aged 0 – 19 has only increased by 2%

2.32 South Northamptonshire is a largely prosperous district that has not fully realised its development opportunities in the past. However, the district's economy has grown in recent years with significant planned employment and housing growth being delivered.

2.33 The district has 65 business parks that provide an anchor for many of the Small and Medium Enterprises (SMEs) that underpin these sectors and associated clusters.

2.34 South Northamptonshire has one of the lowest unemployment levels in the UK. The average commute for settlements along the A43 corridor is almost 20 kilometres suggesting much of this employment involves a certain level of out commuting.

2.35 The resident workforce is highly skilled and professional with 38% having qualifications at the NVQ4 level or above compared to 31% for East Midlands. The district has a higher than average number of residents employed in managerial, professional and skilled occupations. This demographic mix suggests a desirable area for locating business (B1) employment uses.

38%
QUALIFICATIONS
NVQ4 LEVEL OR
ABOVE

HIGHER THAN
AVERAGE EMPLOYED
IN MANAGERIAL,
PROFESSIONAL
AND SKILLED
OCCUPATION

13TH
MOST DESIRABLE
PLACE TO LIVE

65
BUSINESS
PARKS FOR
SMEs



**POPULATION
RISEN BY 21,000
IN 30 YEARS**





Contextual Considerations

3

3. Contextual Considerations

This section identifies some of the contextual considerations that need to be taken into account for each of the employment sites. Each of these considerations have been informed by the need to fulfil the five roles for the employment sites (as listed in item 2.10) and deliver the four objectives, highlighted in each site's design brief and set out in Part 2 Local Plan. These objectives are:

- **Objective 1:** To facilitate economic growth encouraging investment and job creation, aligning training with employers' requirements to get more people into work and reduce levels of unemployment.
- **Objective 2:** To deliver appropriate new employment opportunities in both the urban and rural areas, including home-based working and extended employment areas, facilitated by high-speed broadband.
- **Objective 3:** To facilitate tourism and leisure related growth creating a distinct offer within North Northamptonshire.
- **Objective 9:** To conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes.

3.1 This section includes following contextual consideration:

- the existing scale, form and character of development along the M1 (**3.1**) and A43 (**3.2**) relating to **AL1 - AL4**;
- the establishment/enhancement of two key gateways, a northern gateway into Towcester (**3.4**) relating to **AL1 & AL2**, a gateway marking the A5's transition from a rural to more urbanised context (**3.5**) relating to **AL5**.

- Respectfully and sensitively setting new development within/adjacent to a rural context to the north of the A43 (**3.3**) relating to **AL1 & AL2** and the Ouse Valley Parkland (**3.6**) relating to **AL5**.

Future applicants should identify opportunities where new development can contribute/respond positively to these contexts.

3.2 The role of the employment sites are in part to "...meet the demand for small and medium size units". In order to help establish a common understanding of what **small**, **medium** and **large** building/unit sizes are this section sets out a clear definition on [pages 38 & 39](#). These definitions are informed by a contextual considerations outlined in this section and an understanding of the existing scale, form and character along the M1, A43 and around the Ouse Valley Parkland. The definitions included should be considered applicable to the appropriate building/unit sizes set out within the development frameworks in section 6.

M1 Corridor - Scale, Form and Character

"Provide the ability to strengthen local supply chains."

Paragraph 13.1.5, Part 2 Local Plan

3.3 This section briefly highlights the **large** form, scale and character of employment development located along the M1, contrasting this, over subsequent pages, with development located along the A43.

3.4 There are a series of large scale industry / distribution developments located along the M1 near Northampton. These accommodate some of the biggest retail operators in the country, drawn to a regional connectivity that includes direct motorway links to London, Birmingham (via the M6) and the cities of Leeds, Milton Keynes, Leicester, Nottingham, and Sheffield, among other key settlements.

3.5 The scale of units found in these developments is typified by Swan Valley (1), situated adjacent to junction 15A, which is a large scale distribution park with units ranging in size from approximately 8,000m² to 50,000m².

Figure 4 Swan Valley at junction 15A of the M1 accommodating large units of between 8,000m² to 50,000m², refer to page 26 for mapped location

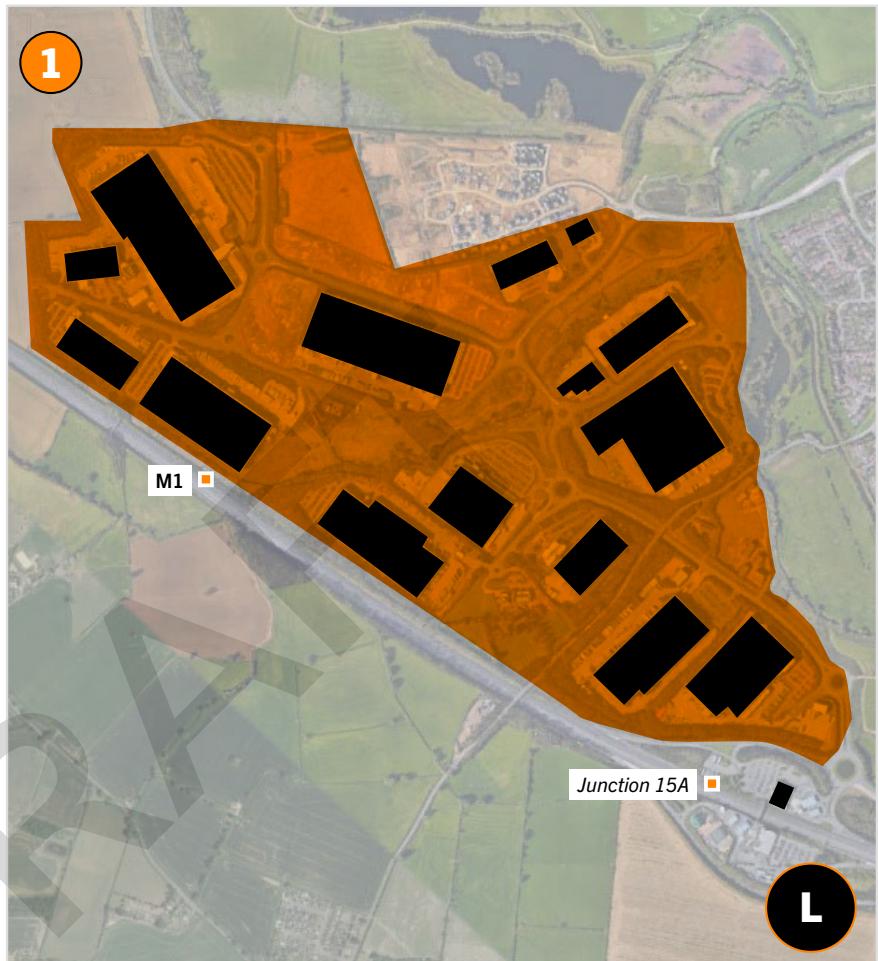


Figure 5 Swan Valley's location adjacent to Northampton and the A43

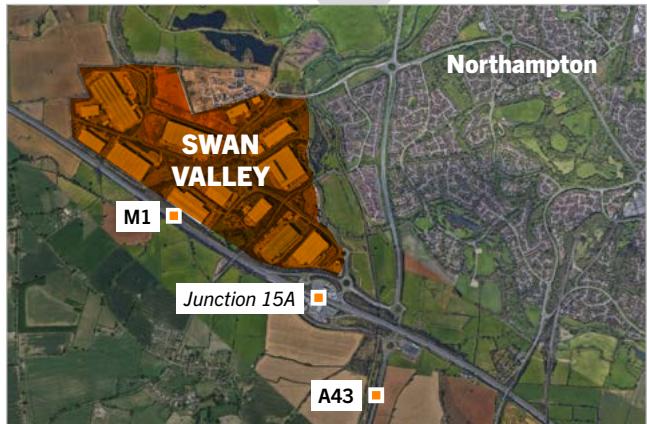


Figure 6 Typical distribution Centre building in Swan Valley



Relevant to

AL1 - AL4

Supporting LP Objectives

Objective 1 - "Deliver appropriate new employment opportunities in both the urban and rural areas"

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A43 Corridor - Scale, Form and Character

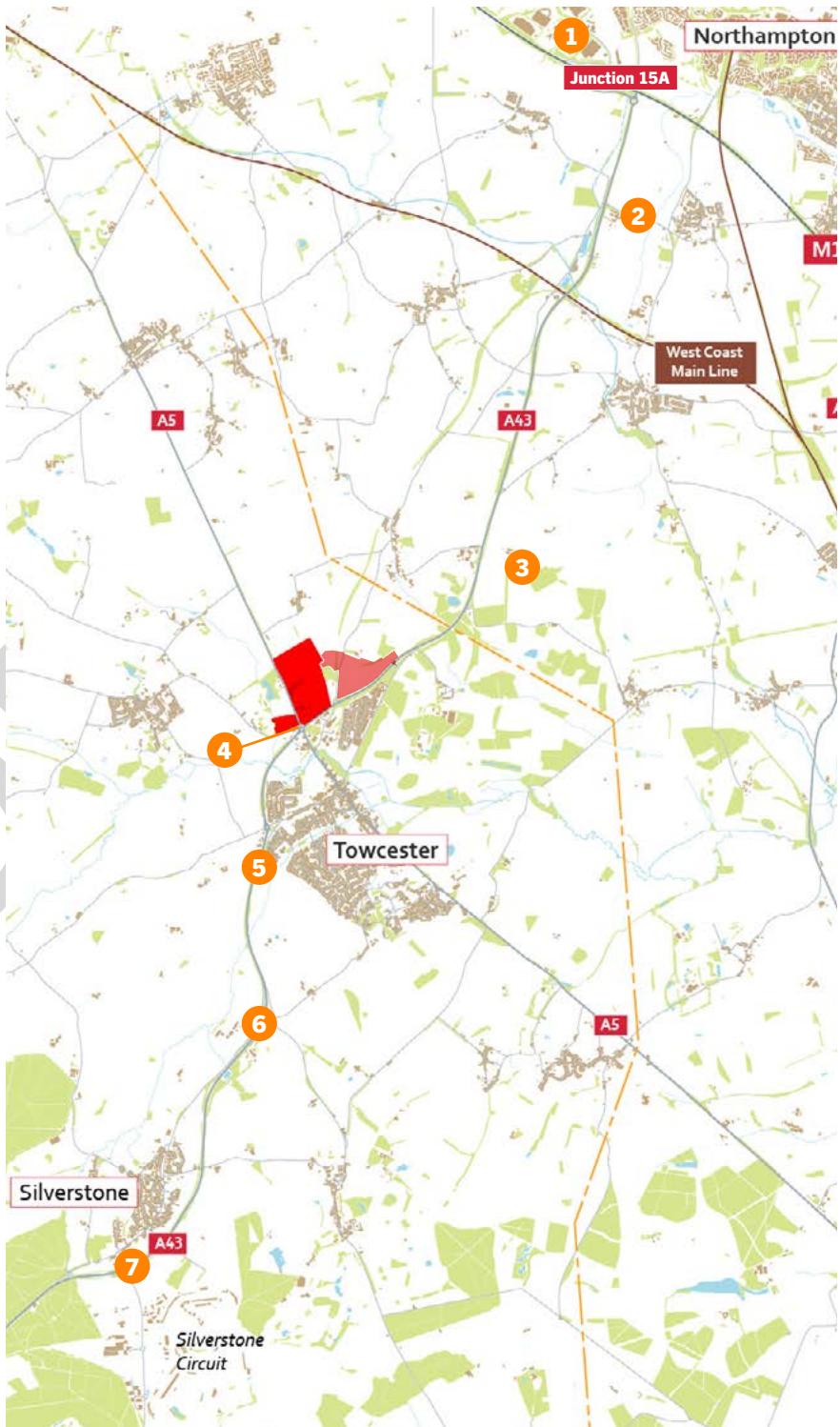
"Meet the demand for small and medium sized units."

Paragraph 13.1.5, Part 2 Local Plan

3.6 This section focuses on the A43 as it approaches the four employment sites of AL1-AL4, extending in the north from the M1 down to Silverstone Circuit. It provides a brief review of the **small** and **medium** scale, form and character of employment development, helping to define an appropriate scale range for buildings/units within the four sites.

3.7 The A43 provides a key connection to the M1 for the settlements of Towcester, Silverstone and Brackley, continue west to connect up to the M40. As the A43 approaches Towcester it takes on a rural character. This is evidenced by the frequency of local junctions providing links to rural settlements, such as Shutlanger & Tiffield, The Gateway School & Technology Centre and to Northampton Road, which provides access to Towcester. There are also

Figure 7 Contextual plan showing key employment uses around junction 15A on the M1 and along the A43



a series of uncontrolled pedestrian crossings, a result of PRoWs crossing the A43 to connect many of these surrounding settlements.

3.8 There is little in the way of industrial / employment between the M1 and Towcester, what there is tends to either be situated adjacent to the A43, without direct access onto it, such as Milton Trading Estate (2) or accommodating a mix of agricultural & leisure uses, such as Top Farm (3). These developments are also screened by a mix of vegetated embankments and semi mature tree planting and/or low level vegetation that bound much of this stretch of the A43.

Figure 8 Milton Business Park adjacent to A43 including small unit sizes ranging from 300m² to 1,700m²

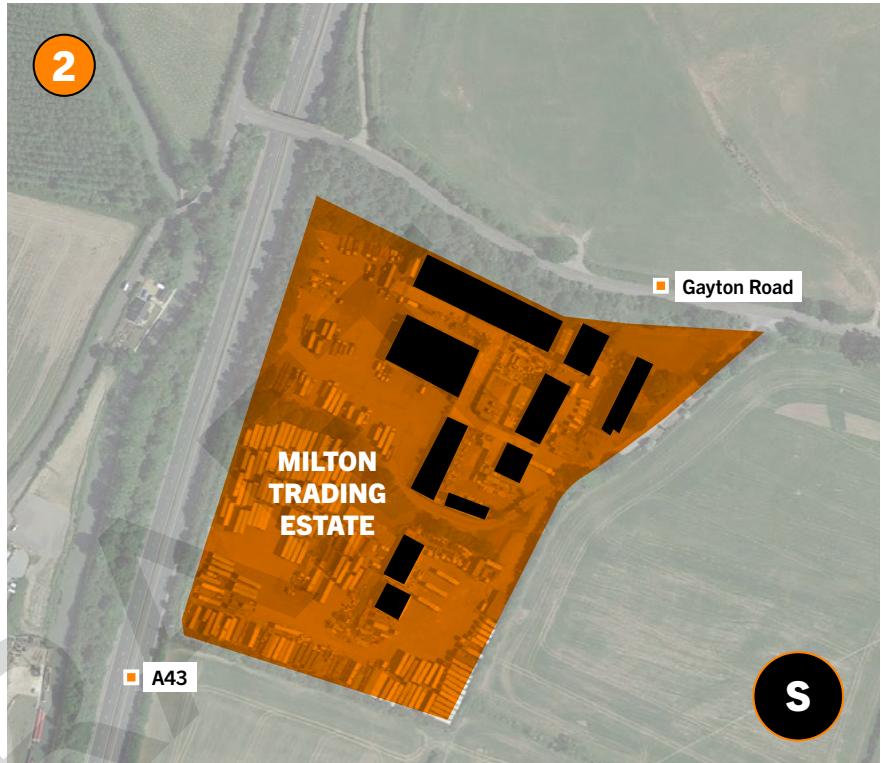


Figure 9 Top Farm, a small leisure/retail/distribution development, including a mix of small and medium unit sizes ranging from 600m² to 4,500m²



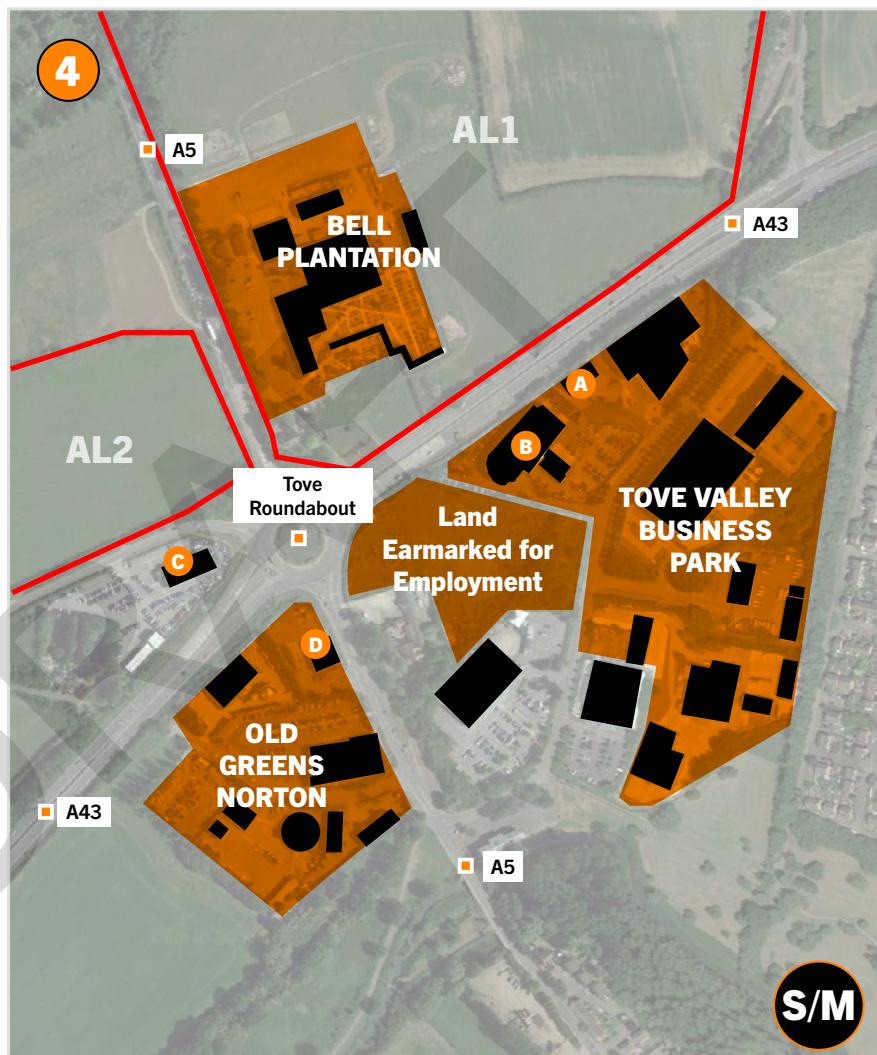
AL1 & AL2 - Towcester A43 Junctions

3.9 On approach southbound to the Tove Roundabout (4) street lighting appear on the roadside along with a mix of buildings/units, including a Screwfix, the Bell Plantation and, most prominently, the Porsche Centre Silverstone. These are setback behind landscape strips comprising a mix of grass verge and hedgerow. On the roundabout Jardine Select, a car dealership and Esso Garage are visible and actively draw attention to themselves with banners and totem signage.

3.10 There are several areas that accommodate a mixture of business and light industrial uses adjacent to the roundabout. Old Greens Norton Road, to the south of the roundabout with a mix of business and light industry centred around an Aldi store. This area accommodates units that vary between 350m² and 1,800m². Tove Valley Business Park sits to the east of the roundabout - beyond land earmarked for employment use - it accommodates units that vary between 350m² and 5,000m². Bell Plantation comprises a series of small buildings that have coalesced over time to form a relatively large footprint, however its scale is representative of a collection of small retail/office units..

3.11 On the western edge of Towcester is Abthorpe Roundabout (5), linking the A43 to the town via Brackley Road. It accommodates a series of small units/buildings that include a takeaway restaurant, hotel and petrol station.

Figure 10 Series of business parks and clusters situated around Tove Roundabout



- A** Screwfix
- B** Porsche Silverstone Centre
- C** Jardine Select Towcester
- D** Esso Garage

Figure 11 Tove Valley Business Park with buildings/units between 350m² and 5,000m²



Source: Google Maps

Figure 12 Eastbound view along the A43 showing a change in the road's frontage/edge from tree planting to grass verge, hedgerow planting and street lighting marking an the approach to Tove Roundabout, with the scale and form of the Porsche building prominent in the background



Source: Google Maps

Figure 13 Westbound view on the Tove Roundabout showing how the Esso Garage and Jardine Select provide a busy/cluttered frontage onto the A43 with totem poles and banners seeking to draw attention.



Source: Google Maps

Figure 14 Old Greens Norton with buildings/units between 350m² and 1,800m²



Source: Google Maps

AL4 - Technology Corridor

3.12 At the A413 junction (6) there are two areas of industrial / employment land uses each of which accommodate a range of small to medium units/buildings. Silverstone Fields Farm accommodates units of between 375m² and 2,500m² and Silverstone Business Park accommodates units of between 250m² and 1200m². The area is also home to several solar farms, one to the immediate south of AL4 and another 650 metres west of the A43.

3.13 Further south a range of business and light industry is situated within Silverstone Park, approximately 700 metres south of the Dadford Road junction of the A43 (7). These are immediately adjacent to Silverstone Circuit and accommodate a mix of small and medium units/buildings, between 500m² and 5,000m². The scale, form, character and use of this park are heavily informed by Silverstone Circuit, which has led to a cluster of technology and motorsport-related employment uses located within units similar in scale to the buildings within the circuit.

3.14 Combined with green energy employment uses at the A413 junction there is a corridor of technology-related employment emerging along this stretch of the A43.

Figure 15 Series of business parks and clusters including small units situated around A413 junction

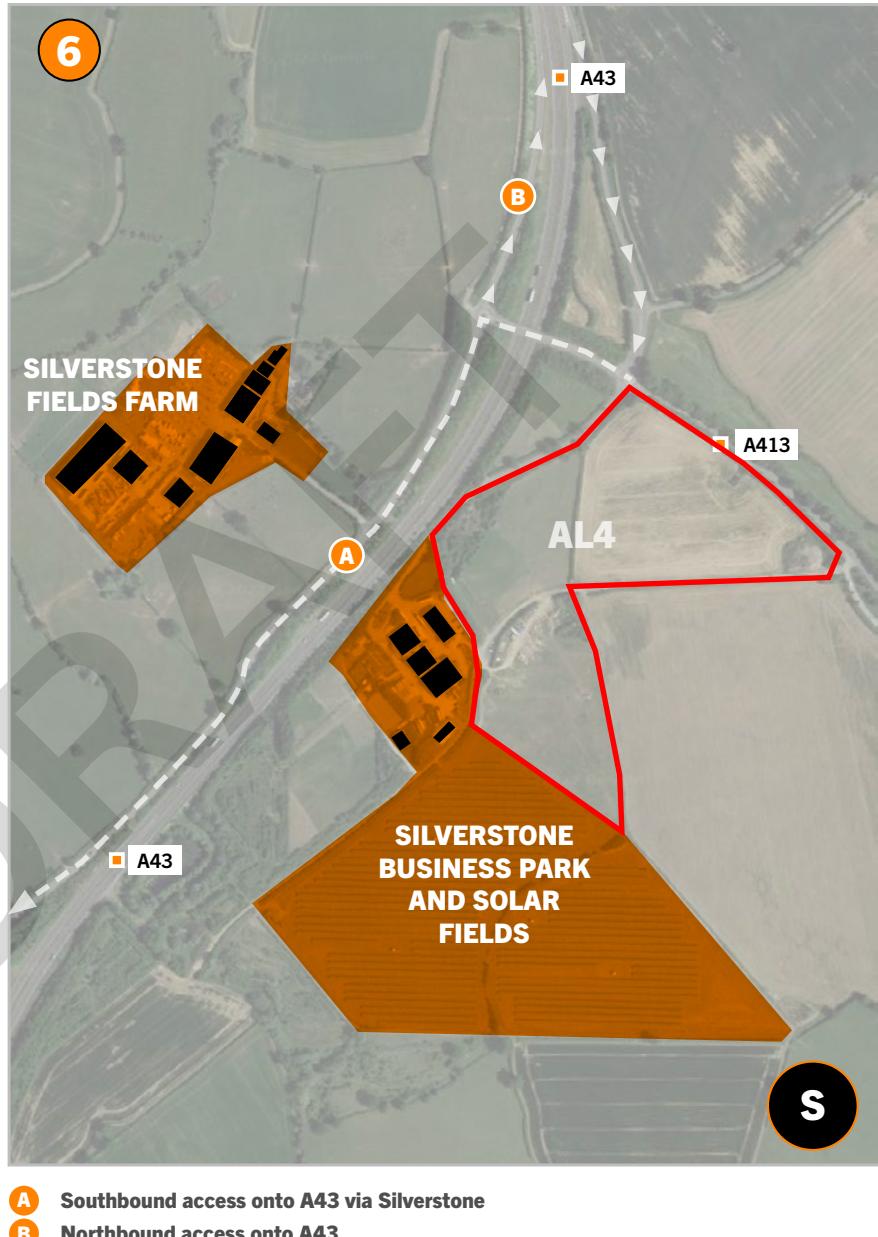
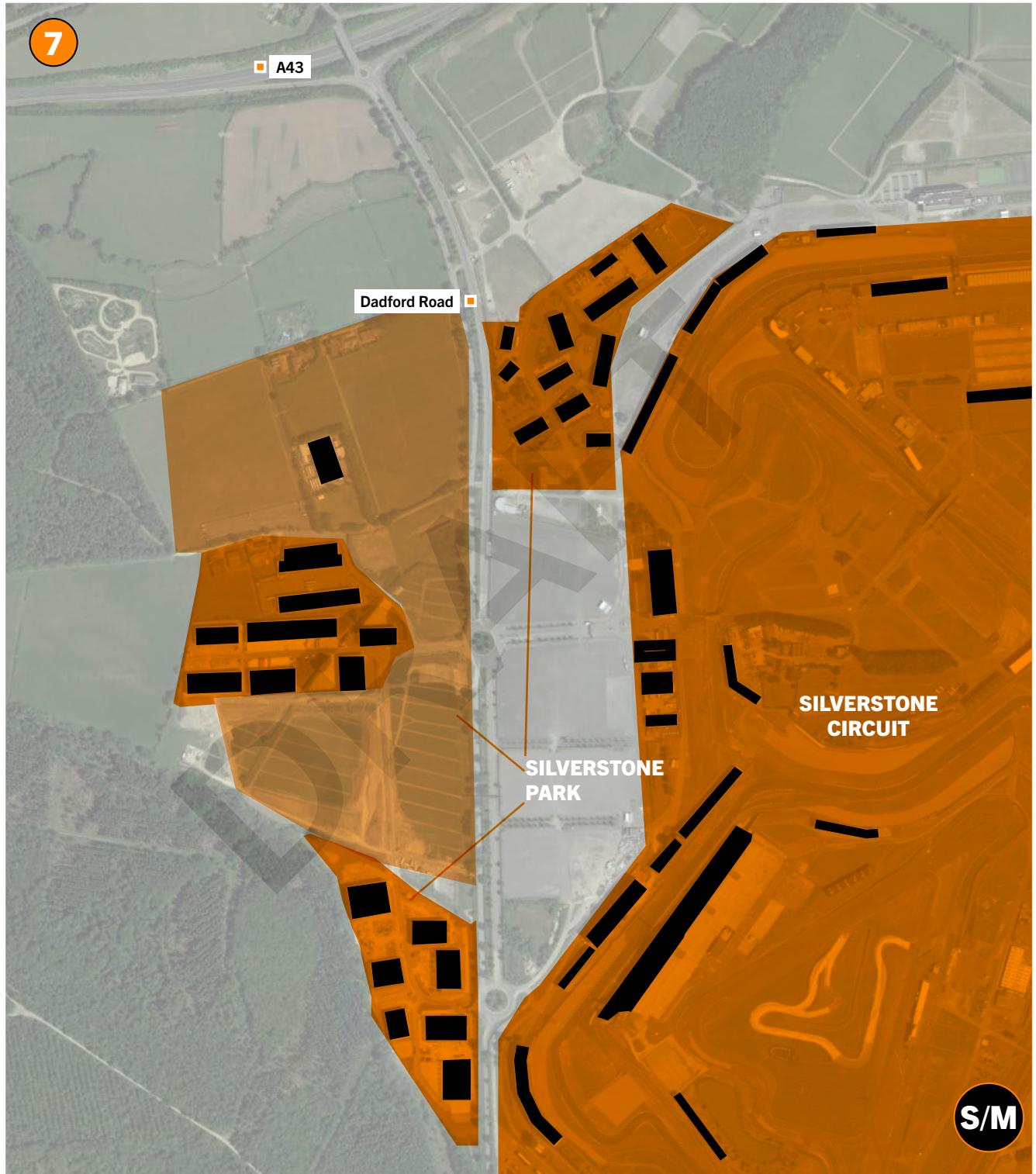


Figure 16 Silverstone Park, accommodating a mix of small and medium units of between 500m² and 5,000m² (lighter orange recently developed / still being developed)



Relevant to

AL1, AL2 & AL4

Supporting LP Objectives

Objective 1 - "Deliver appropriate new employment opportunities in both the urban and rural areas."
Page 205

Rural Setting North of A43

"Meet local demand and strengthen the rural economy"

Paragraph 13.1.5, Part 2 Local Plan

3.15 The area surrounding AL1 & AL2 to the north of the A43 is made up of agricultural land, with an arrangement of small and large fields defined by boundaries of hedgerow with intermittently tree planting. The rural character is reinforced by land form that gently slopes north to south down to the River Tove with views from the public road and path network towards Towcester and the wider countryside.

3.16 Situated within this landscape are a series of small rural settlements. Aside from the A5, which bisects the area and Towcester Road, which links the A43/Towcester to Greens Norton the road network is made up of single track country roads.

3.17 There are more substantial blocks or corridors of tree planting situated nearer the A43 to frame recreation, leisure or retail development, such as the Towcestrians Sports Club. Many of the buildings associated with these land-uses are of a height and scale in keeping with that of large agricultural buildings in the area.

3.18 The ability to provide development whose form and scale considers/reflects the rural character of this area through built or landscape elements will enable a more gradual and sensitive transition from north Towcester to the surrounding countryside.

Figure 17 Photo showing rural character of area north of A43



Figure 18 Photo of Caldecote one of several small rural settlements in this area



Figure 19 Typical agricultural building situated within the area north of the A43



Figure 20 Building associated with Towcestrians Sports Club, similar in scale and mass to the agricultural buildings found in the area



Figure 21 Plan showing rural character of land to the north of the A43, with farmland separating small rural settlements



Relevant to

AL1 & AL2

Supporting LP Objectives

Objective 9 - "...conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding land use."

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Towcester Northern Gateways

"Contribute to reducing the level of out commuting."

Paragraph 13.1.5, Part 2 Local Plan

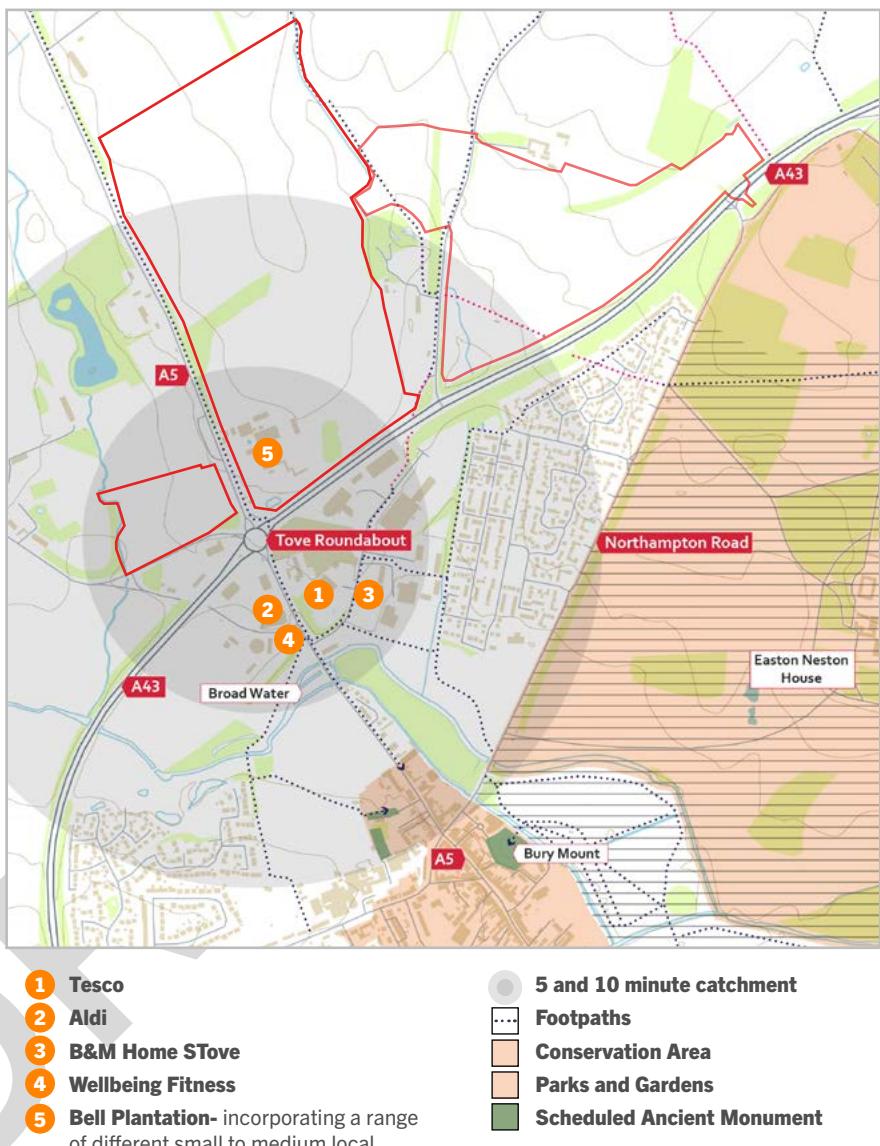
3.19 AL1 & AL2 are situated adjacent to Tove Roundabout, a key accessible gateway into north Towcester, sitting approximately 10 minutes walk from the town centre. Tove Roundabout is currently surrounded by a range of services and facilities that cater to residents of the town and the surrounding area. Most notable is a Tesco and Aldi supermarket and a B&M Home STove, each of these are connected to the centre of Towcester and outlying residential areas via a network of footpaths.

3.20 On the northern side of the roundabout is the Bell Plantation, this includes a range of local resources, many of which appear to be 'start up' businesses. This area includes a nursery, vet, dog behaviourist, make-up clinic, dog groomer, hairdressers, indoor playground and garden centre, amongst others. This cluster of uses indicate that the area is regularly used and visited by local residents, presenting an opportunity to introduce further service provision / employment land use of a similar nature. If delivered sensitively and in line with policy this could see the delivery of some small sized buildings alongside medium and large development units.

"Local flexibility and choice of locations"

Paragraph 13.1.5, Part 2 Local Plan

Figure 22 Plan showing services around Tove Roundabout and their accessibility from Towcester



3.21 Bell Plantation is accessed via a continuous footpath running along the eastern edge of the A5 to Towcester Town Centre, with signalised crossings on the A43. New development may provide the opportunity to create a more active and distinctive approach to Towcester and the Northern Gateway from along the A5 and A43.

3.22 This northern gateway act as a key arrival point into the historic settlement and its function should be fully considered relative to the design quality of proposals at AL1 & AL2, as well as scale and massing.

Relevant to

AL1 & AL2

Supporting LP Objectives

Objective 3 - "...to facilitate tourism and leisure related growth."

Objective 9 - "...high quality design that is respectful to heritage assets and their settings..."

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Old Stratford Gateway

3.23 AL5 occupies a prominent and visible site at the Old Stratford Roundabout, which provides a key transition from a rural single carriageway stretch of the A5 from Towcester to a more built up dual-carriageway stretch, continuing towards and through Milton Keynes. Current uses here include a Travelodge, car dealership, small office/retail buildings and an area of housing. These are all of a small scale with footprints ranging from 50m² to 150m².

3.24 The buildings that currently sit beside the roundabout, although visible from it are not orientated to address and thus help form a positive gateway. With AL5 there is an opportunity for any future buildings/units to be sited, orientated and include a high quality facadal treatment that allow them to positively address the roundabout and enhancing the visual approach to it, particularly when travelling southeast bound along the A5. While at the same time contributing to the mix of uses that currently preside beside the roundabout, bringing a mix of activity and employment opportunities.

Figure 23 Image showing the Old Stratford Roundabout that marks a transition in the character of the A5



Figure 24 Photo showing new housing and linear parkland space fronting onto the roundabout



Relevant to	AL5
Supporting LP Objectives	<p>Objective 9 - "...conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes.</p> <p>Objective 1 - "Deliver appropriate new employment opportunities in both the urban and rural areas..."</p>
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Ouse Valley Parkland

"Contribute to reducing the level of out commuting."

Paragraph 13.1.5, Part 2 Local Plan

3.25 The eastern end of AL5 abuts the Ouse Valley Park, an area of managed accessible semi-rural parkland that extends from the northern edge of Wolverton westwards, cutting across the A5 and between Old and Stony Stratford. The parkland is accessed via a series of PRoW and informal paths and is characterised by the River Great Ouse, Grand Union Canal and two nature reserves.

3.26 The Dogsmouth Brook, runs both through and along the northern edge of AL5 and feeds into the river. The Old Stratford Arm section of the Grand

Union Canal Conservation Area cuts through the centre of the site. A footpath overpass already provides links across the A5, connecting the parkland footpath network with paths along the Old Stratford Arm to Cosgrove, in addition to paths linking to settlements to the north west, such as Potterspury.

3.27 This series of natural & heritage features and network of footpaths within AL5 help connect it both physically and in terms of character to the wider parkland area. This offers an opportunity, as part of any future development in AL5 for a sensitive extension to the Ouse Valley Parkland.

3.28 There are a number of example employment areas that bound or are in close proximity of the Ouse Valley Park. Wolverton Mill Business Park is

connected to the Ouse Valley via an area of parkland called Wolverton Mill Balancing Lake. It provides a mix of B1, B2 and B8 employment uses, with units ranging in size from 500m² to 7,150m² and Old Wolverton Road Industrial Park, with a mix of B2 and B8 employment uses and units ranging in size from 220m² to 33,000m².

3.29 The use of B1 employment and small buildings along its parkland edge allows Wolverton Mill to integrate into its parkland setting. Old Wolverton's inclusion of distribution and light industry results in less integration with the adjacent parkland, with a substantial (20-30 metre) tree belt screening development from the parkland. AL5 has the opportunity integrate new employment with the adjacent parkland, seeing it as a resource to enhance the employment offer it provide.



Figure 25 Plan showing Ouse Valley Parkland in relation to site and a number of employment sites that also abut the parkland

- ① Stratford Arm
- ② Wolverton Mill Balancing Lake
- ③ Footpath under A5 linking AL5 to Ouse Valley
- ④ Stony Stratford Nature Reserve
- ⑤ The Floodplain Forest Nature Reserve

- Flood Plain Area
- Conservation Area
- Scheduled Ancient Monument
- Ouse Valley Park
- Footpaths

Figure 26 Wolverton Mill Business Park with a mix of B1 (in grey), B2 and B8 employment uses with units ranging in size from 500m² to 7,150m²

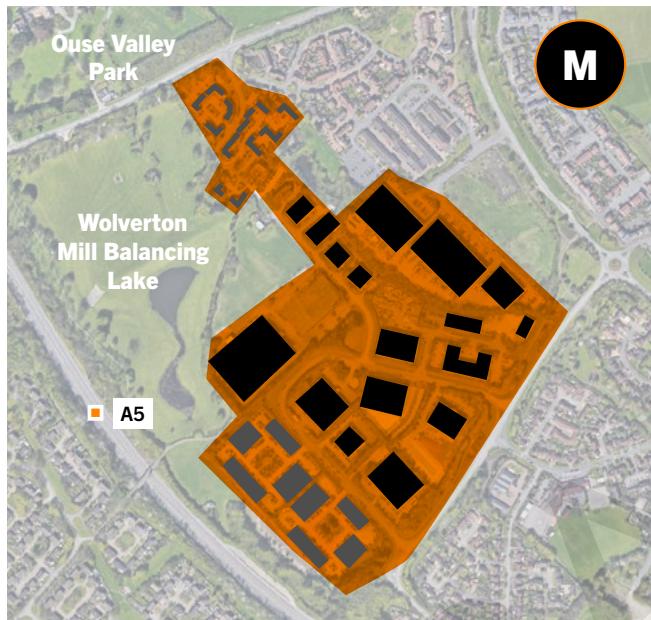


Figure 28 Wolverton Mill Business Park has office buildings adjacent to and overlooking adjoining parkland



Figure 27 Old Wolverton Industrial Park with a mix of B2 and B8 employment uses with units ranging in size from 220m² to 33,000m²

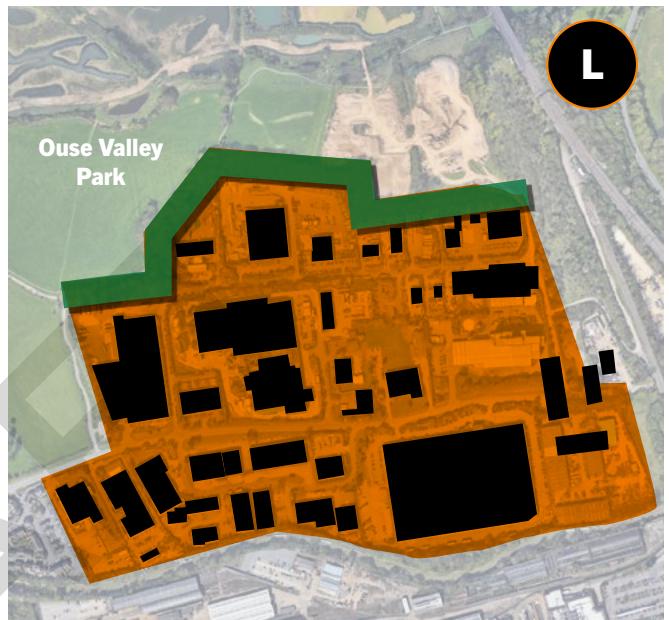
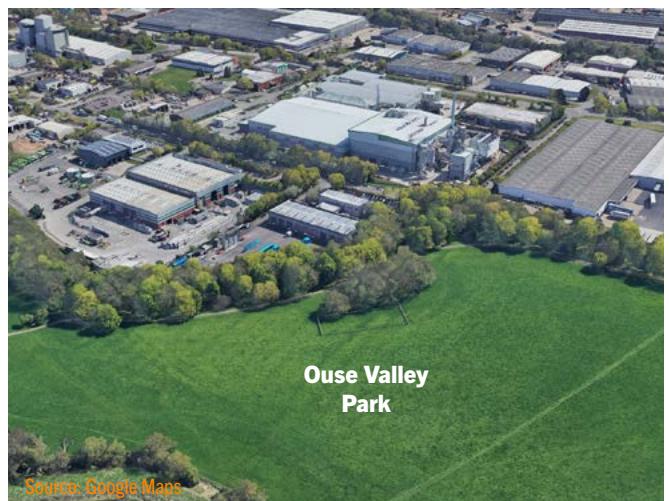


Figure 29 Old Wolverton Industrial Park has a substantial tree belt screening large scale industrial uses from the parkland



Relevant to

AL5

Supporting LP Objectives

Objective 9 - "...conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes."

Objective 1 - "Deliver appropriate new employment opportunities in both the urban and rural areas...""

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Small, Medium and Large Unit Sizes

The existing scale of employment buildings/units along the stretch of the A43 sites AL1, AL2 & AL4 are situated sets a precedent for the scale of new development. This area, as it approaches and passes Towcester has primarily seen the development of small business, light industrial and distribution parks that incorporate small buildings/units. These range in size from **250m² to 2,500m²** and include Milton Trading Estate and Silverstone Business Park. This size range represents what the SPD considers as **small**.

Business parks with larger sized buildings/units are located at Tove Roundabout (Tove Valley Park) and Silverstone Circuit (Silverstone Park), with units increasing to around 5,000m². The largest buildings within these parks has a footprint approximately 3,000m² less than the smallest units seen in Swan Valley, adjacent to the M1, whose scale, form and character reflect their function in servicing the wider region. This SPD considers anything over the minimal scale of unit/building seen in Swan Valley (**8,000m²**) to represent a **large** scale of unit/building, leaving a **medium** scale to represent unit/building sizes in between (**2,500m² to 8,000m²**).

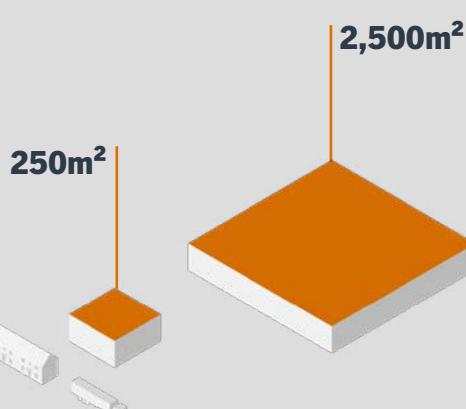
For AL5 the scale of buildings in Wolverton Mill provides a broadly similar scale context for small to medium buildings/units, with these ranging from 220m² to 7,150m². As such the above will also apply to this site.

The presumption will be for the accommodation across the employment sites of a mix of small, medium and large sized units, as defined above. This will allow them to support, as the design brief's state:

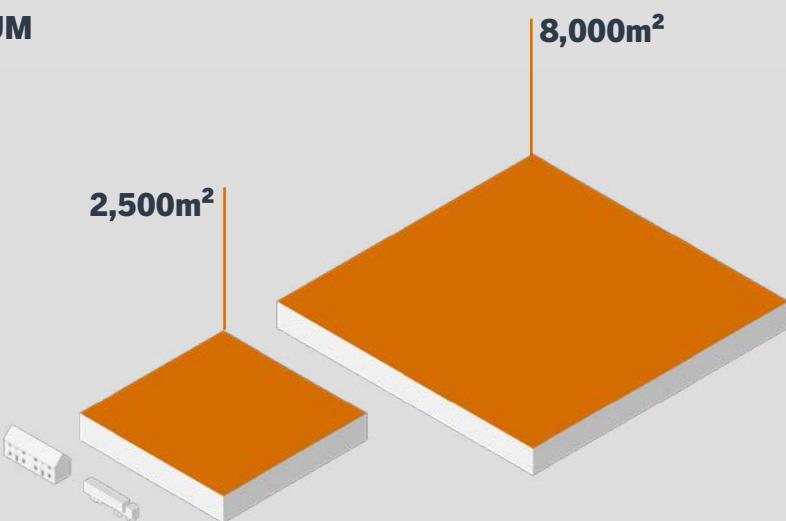
"a variety of employment types... ...to reflect the need for diversity and resilience in the local economy".



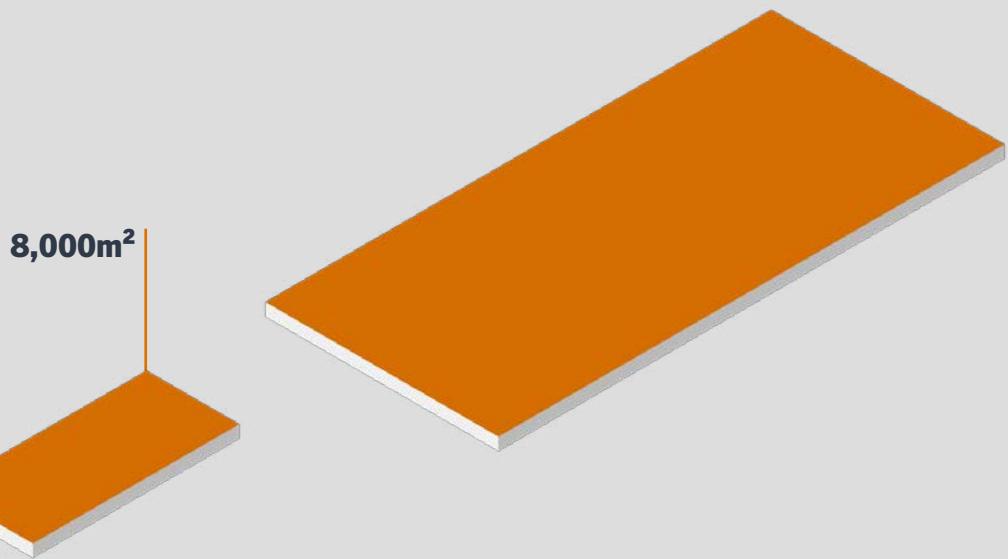
SMALL



MEDIUM



LARGE



House and
HGV included
for scale





Landscape and Visual Consideration

4

4. Landscape and Visual Consideration

This section sets out a landscape and visual summary for each of the four employment sites. It includes a series of potential sensitive receptors that have informed the identification of 'Sensitive Areas' within each site, as outlined at the end of each summary and illustrated in the development frameworks throughout section 6.

4.1 The landscape and visual context of the four employment sites needs to be considered to, as stated by Local Plan Objective 9:

...conserve the tranquillity of the natural and built environment in South Northamptonshire through high quality design that is respectful to heritage assets and their settings, biodiversity and the environmental character of the locality and surrounding landscapes.

4.2 The sensitive receptors collated in this section have been obtained from a mix of desktop study and site visit. They are not intended as a thorough or exhaustive representation of the potential visual impact of development on each site and do not weight receptors in terms of significance or the views in terms of sensitivity. As such further landscape and visual assessment work will need to be undertaken at planning application stage to determine the significance of receptors and sensitivity of views.

Visual Summary AL1 & AL2

A. Views from surrounding countryside (Greens Norton / Duncote / Caldecote / Tiffield)

4.3 The landform to the north of the A43 is defined by gently raising ridge lines and shallow valleys. Fields situated immediately adjacent to the A43 are large in size with a patchwork of smaller fields north of AL1. The countryside is highly accessible with an extensive network of public rights of way and bridleways.

4.4 Short, medium and long distance views of AL1 and AL2 are offered from a number of Public Right of Ways (PRoWs), bridleways and country lanes situated to the north of the A43. These offer an important visual connection to the wider geography and landscape of the area, much of which is still rural in character. Development within the three sites has the potential to impact this connection particularly on approach to rural settlements from Towcester. The identified receptors are visible from:

- PRoW SA4 and SA2 linking south from Tiffield to the A43 with potential western views of AL1 (**vp1, 2 & 11**).
- PRoW RN11, linking Greens Norton to the A5 with potential views of AL1 and AL2 (**vp3**).
- PRoW RN15 and SB8, linking Greens Norton south to the A43 with potential views of AL1 and AL2 (**vp4 & 5**).
- PRoW RN10, linking Duncote south to the A5 with potential views of AL1 (**vp14**).

-
- 4.5 In addition local views of AL1 are offered from several points along PRoW SB1, which leads down from Caldecote, running along the eastern edge of AL1 (**vp6 & 13**).

B. Views from A5 and A43 Corridors

4.6 The A5 sits on land that gently drops as it approaches the Tove Roundabout and Tove Valley beyond. As the A5 passes the northern half of AL1 a clear view into the site is offered through limited roadside vegetation (**vp7**). Continuing south AL1 is soon screened by a mature belt of woodland and viewed within a foreground context of the Bell Plantation site. On the opposing side of the A5 Southbound views of AL2 open up at that site's north eastern corner, disappearing on approach to Tove Roundabout (**vp8**). These southbound views of the sites should be considered within the visual context of the A5's approach to Tove Roundabout, where views of existing development start to appear.

4.7 The A43 sits on land that gently falls in a south westerly direction, as it heads towards Tove Roundabout. Cut and fill works have resulted in it sitting either at grade or below the level of the surrounding countryside. A raised embankment and semi-mature tree & shrub planting limit immediate views of the southern half of AL1 from the A43 corridor (**vp9**). As the Tove Roundabout is approached signage associated with Bell Plantation is visible from the roadside, as are a number of buildings set further north into AL1 (**vp12**).

4.8 Westbound views of AL2's frontage along the A5 and Towcester Road are visible along the A43, at the Tove Roundabout, partially screened by tree planting at approximately 10-12 metres (**vp10**). These views along the A43, near the Tove Roundabout should be considered in relation to the existing business and industrial development that abut the road and roundabout.

C. Views from Easton Neston House and Grounds and Towcester Race Course

4.9 There are considered limited if any views of the site from the house or grounds, however AL2 does sit on the alignment of a tree-lined avenue in front of the House. This once provided a visual link from the House to the church in Greens Norton. Although any relationship is largely severed by intervening development future proposals for AL2 should consider views

along this alignment when preparing the arrangement, height and massing of any built form.

4.10 There are distance views of the site from the southern edge of Towcester Racecourse, approximate 2.5 km south of the three sites. These views are currently set against rising land form and tree & woodland planting along field boundaries (**vp15**).

Figure 30 Plan highlighting key receptor areas around AL1 & AL2

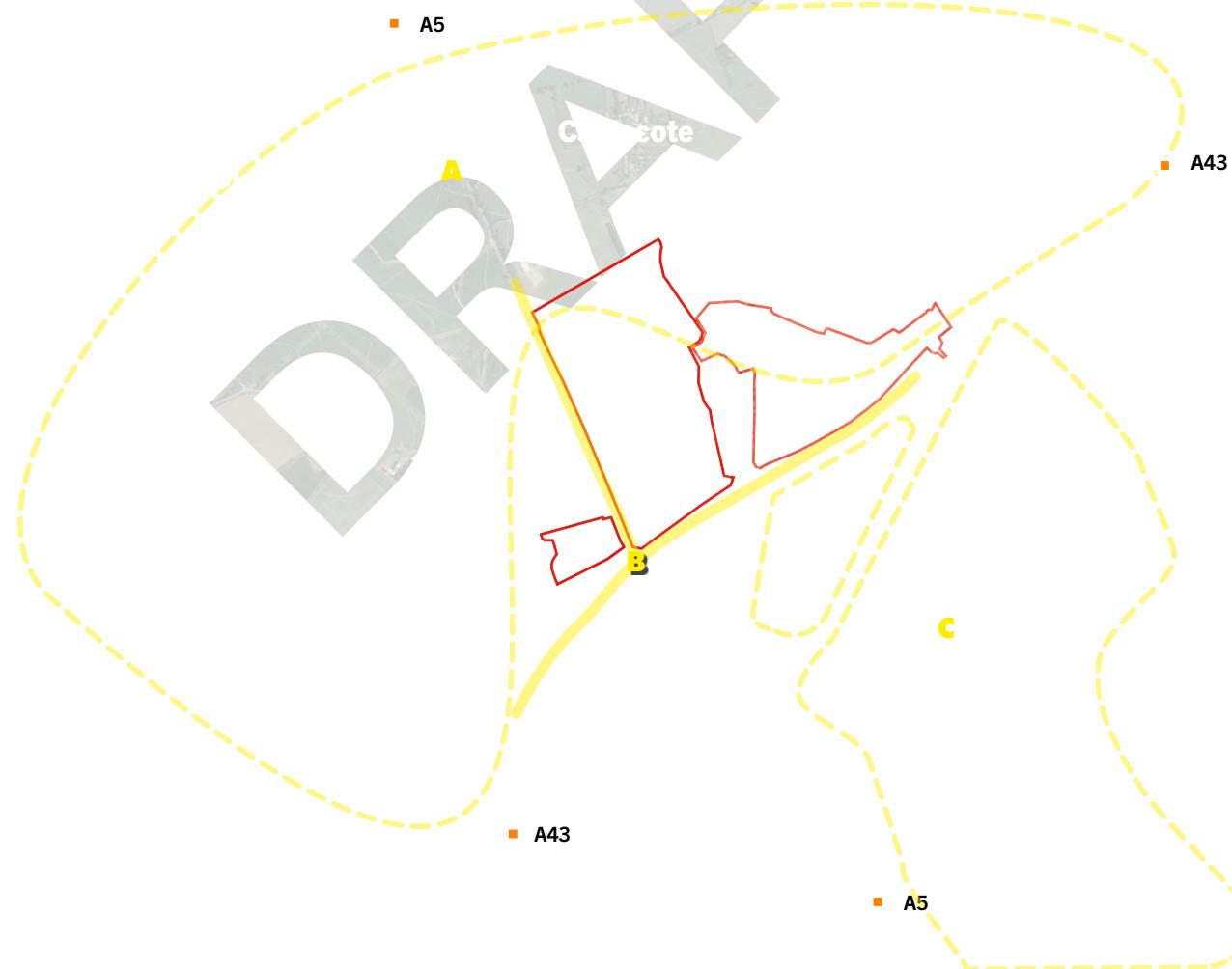


Figure 31 Plan showing potential sensitive receptors for AL1 & AL2, numbers are referenced in text on pages 42-43 and shown in photos over pages 46-49





- Conservation Area
- Parks and Gardens
- Alignment of Tree-lined Avenue
- Scheduled Ancient Monument
- Footpaths
- AL1 Potential Sensitive Receptor
- AL2 Potential Sensitive Receptor
- AL1 and AL2 Potential Sensitive Receptor
- Watercourse
- Local Ridge lines

Visual sensitivity AL1 & AL2

AL1 - There is a need for greater sensitivity in developing areas along the northern and north eastern edges of the site due to the rising topography and rural character of the land making this part of the site sensitive to receptors from the north, east and west, across the countryside from several PRoWs and country road.

AL2 - There is a need for greater sensitivity in accommodating new development within the north eastern and south eastern corners of the site due to views offered when approaching the site south along the A5 and west along the A43.

Figure 32 Viewpoint 1 looking southwest from PRoW SA4 towards AL1, with power lines characterising the fore to mid ground view



Figure 33 Viewpoint 2 looking southwest from PRoW SA4 across the landscape towards AL1, with open views beyond towards countryside that sits south of Towcester. Williams Barns and woodland planting provide partial screening.



Figure 34 Viewpoint 3 looking southeast from PRoW RN11 towards AL1 and AL2, with layers of mature tree planting along field boundaries creating a continuous wooded horizon line.



Figure 35 Viewpoint 4 looking east from PRoW RN32 towards AL1 and AL2, screened by belts and blocks of woodland situated between Towcester Road and the A5



Figure 36 Viewpoint 5 looking northeast from the joining of PRoW SB8 and SB48 towards AL1 and AL2

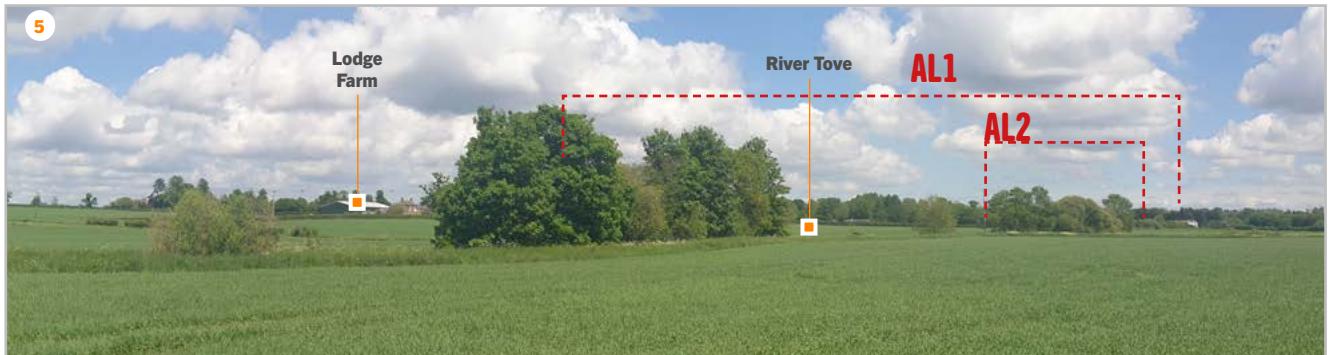


Figure 37 Viewpoint 6 looking south from PRoW SB1 towards AL1 with a belt of woodland screening the north western area of the site and intermittent tree planting lining a field boundary along the site's northern edge



Figure 38 Viewpoint 7 looking east from the A5 across the northern field of AL1, along a section of the road where there is minimal roadside planting



Figure 39 Viewpoint 8 looking southwest from the A5 towards AL2, showing minimal roadside and field boundary planting screening the site yet viewed within the context of an approach to the roundabout and the existing access to Bell Plantation



Figure 40 Viewpoint 9 looking northeast from the A43/ Old Tiffield Road junction towards AL1, showing a gap in tree planting on the junction corner



Figure 41 Viewpoint 10 looking west from the pedestrian island crossing at Tove Roundabout towards the eastern corner of AL2

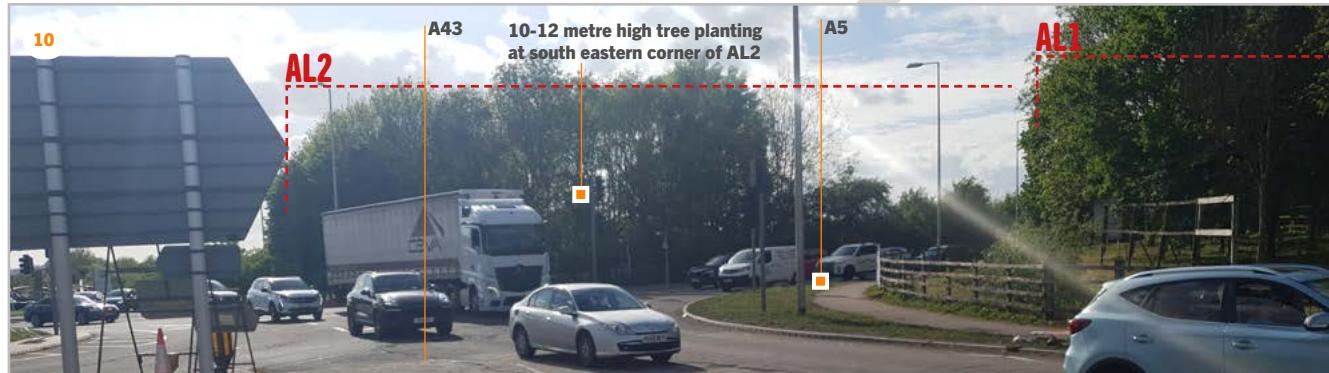


Figure 42 Viewpoint 11 looking southwest from PRoW SA2 across a shallow valley towards AL1, with an undulating patchwork of fields, blocks of woodland and a power line characterising the view towards the site



Figure 43 Viewpoint 12 looking northeast from the central island at the pedestrian crossing at Tove Roundabout towards AL1's edge with the A43, showing the mix of hedgerow, grass verge and tree planting landscape treatment



Figure 44 Viewpoint 13 looking west from PRoW SB1 (within the north-western part of AL3) towards AL1, with views of the northern half of AL1 beyond field boundaries of shrub and tree planting as land form rises up to a local ridge line. An area of woodland planting around Brickyard Farm largely screens the southern half



Figure 45 Viewpoint 14 looking southeast from PRoW RN10 towards AL1, with glimpses through to the northern half of the site through planting along field boundaries, the A5 and a watercourse that leads down to the River Tove

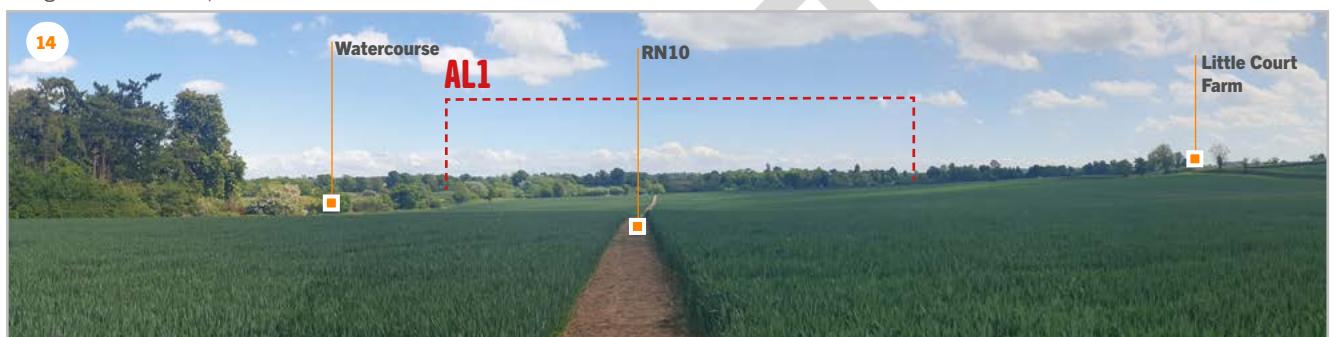


Figure 46 Viewpoint 15 looking north from the southern edge of Towcester Racecourse towards AL1 with existing woodland planting and rising land form defining the skyline beyond the sites



AL4 - Visual Summary

4.11 The area AL4 sits within has land form gently sloping westwards towards the A43 and beyond, down to the Silverstone Brook. The area is made up of medium to large fields, many of which are irregularly shaped in part due to the severance caused by the A43 and associated engineering works. There are limited key receptor points locally around the site with few footpaths in the immediate surrounds.

Views from along A413

4.12 The A413 provides the key local corridor from where AL4 is visible. There are glimpses through to the site on its eastern edge at a roadside stopping point (**vp1**). The bridge over the A43 to the north west of the site offers a raised elevation of the site's western interface with the A43 corridor, a tree planted edge of approximately 12-15 metres currently screen the site from this location (**vp7**). Further south west along the A413 views are offered looking across the A43 towards the western edge of the site, above the planted roadside embankment (**vp2**).

Views from the South, East and West

4.13 Further afield, due to AL4's siting on land rising in a north/north easterly direction from the Silverstone Brook there are a series of potential receptor locations from the south, east and west sensitive to future development. Over the following pages the following locations have been included to illustrate this potential sensitivity:

- from the south - several points along Whittlebury Road / Church Way, a road linking Silverstone to Whittlebury (**vp3 & 4**), and; along a bridleway (RX5) situated to the north of Silverstone Circuit (**vp 9 & 12**).
- from the east - beyond the A413 and along PRoW SB17 and SB31, which both run past the eastern edge of Burcote Wood (**vp5 & 6**).
- from the west - along PRoW RA13 and SB14, a footpath that runs between Silverstone and Park Farm (**vp8**); adjacent to where PRoW RA32 joins a country road that leads west along Church Street out of Silverstone (**vp11**), and; a point along PRoW RA15 to the west of a solar farm (**vp10**).

Visual sensitivity AL4

There is a need for greater sensitivity in developing areas at the southern and eastern corners of the site due to the site's position on rising land making this part of the site particularly sensitive to receptors from the south and west

Figure 48 Plan showing potential sensitive receptors for AL4 from the south and west, numbers are referenced in text on previous page and shown in photos over pages 52-55



Footpaths
 Potential Sensitive Receptor
 Watercourse

Figure 47 Plan showing potential sensitive receptors for AL4, numbers are referenced in text on previous page and shown in photos over pages 52-55

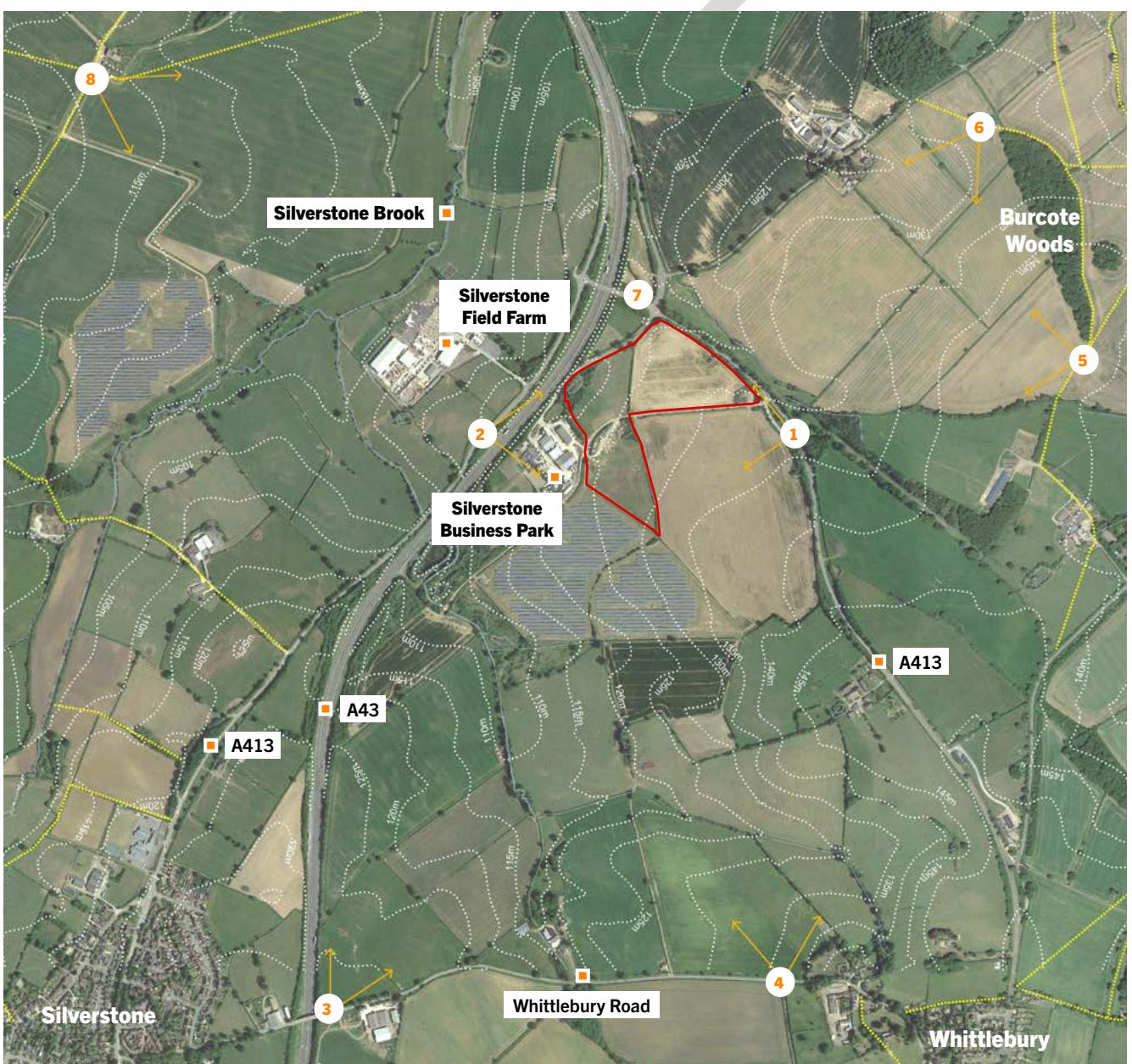


Figure 49 Viewpoint 1 looking west from the A413 towards AL4, showing the break in roadside tree planting offering views through to low level hedgerow planting along the eastern edge of the site



Figure 50 Viewpoint 2 looking east from A413 towards the western edge of the site over the A43, with units associated with Silverstone Business Park rising above the level of landscape treatment along the A43



Figure 51 Viewpoint 3 looking northeast from Whittlebury Road towards AL4, showing the site sitting just beyond a solar farm with Burcote Woods provided a tree lined skyline



Figure 54 Viewpoint 4 looking north from Whittlebury Road towards AL4, with the site sitting beyond intermittent tree and hedgerow lined field boundaries and a solar farm



Figure 52 Viewpoint 5 looking west from PRoW SB17 over an area of rising land form towards AL4



Figure 53 Viewpoint 6 looking southwest from PRoW SB32 towards AL4, with the site sitting beyond intermittent tree lined field boundaries and a utility line



Figure 55 Viewpoint 7 looking east from A413 as it cuts across the A43 towards the AL4, with the A43's tree planted embankment screening the site



Figure 57 Viewpoint 8 approximately 1.5 km from AL4 looking east from a junction of three PRoW (SB14, SB26 and SB33), with the site visible on land rising up above Silverstone Field Farm and Silverstone Business Park



Figure 56 Viewpoint 9 approximately 2.5 km from AL4 looking north from PRoW RX5, with the site just visible above the solar farm on land rising up from Silverstone Brook



Figure 58 Viewpoint 10 looking east from PRoW RA15 towards AL4, with the site visible on land that continues to rise up from Silverstone Brook to Burcote Wood

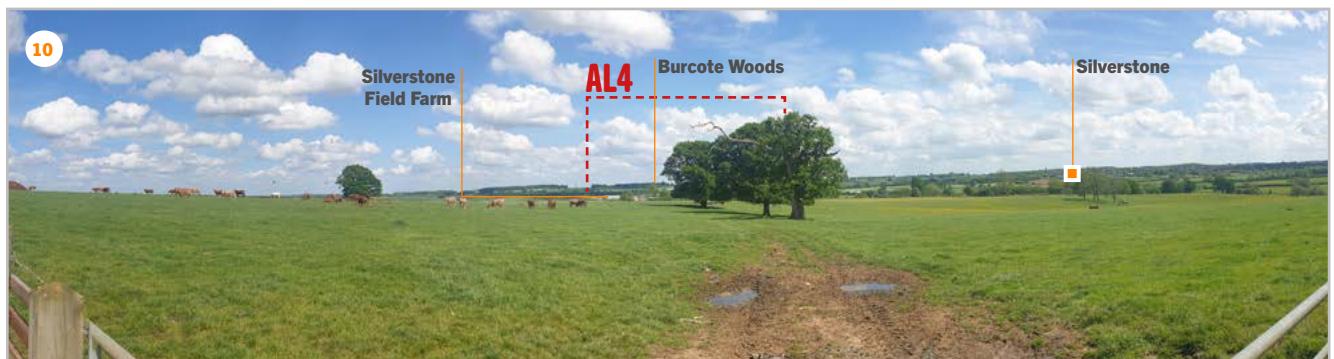


Figure 59 Viewpoint 11 approximately 2.2 km from AL4 looking north from PRoW RA15, with the site and adjacent solar farm visible on land that continues to rise up from Silverstone Brook to Burcote Wood



Figure 60 Viewpoint 12 approximately 2.5 km from AL4 looking north from a junction of four PRoW (RX2, RX5, RX6 and RX30), with a view of the site sitting just above the solar farm and east of units in Silverstone Business Park



AL5 - Visual Summary

4.14 The area the site sits within slopes gently eastwards and southwards towards the River Great Ouse. Within the site there is a more localised drop with land sloping gently southwards and northwards to the Dogmouth Brook, as it cuts east west through the site on course to feed into the River further east. Fields in the area range in size and are shaped by the many man-made and natural features that have cut through the area, including roads, watercourses and canals. There is an extensive network of PRoW as the area transitions from a sparsely populated agricultural & rural area in the west to an area of higher population and landscape managed more for ecology and recreation in the southeast, including Ouse Valley Parkland.

A5 Approach

4.15 Views of the western edge of the site along the A5 start opening up approximately 100 metres to the north west of the A508 roundabout (**vp1**), becoming most prominent on the roundabout (**vp2**).

4.16 The site is well screened by roadside landscape and a raised embankment as the A5 continues east past Old Stratford. When the road passes over River Great Ouse foreground views of field in south eastern corner of site are offered, these being particularly significant for westbound traffic (**vp3**).

Northampton / Stratford Road

4.17 The narrow carriageway and blocks of mature roadside planting mean there is limited inter visibility between the site and the Northampton Road. On entry into Cosgrove, adjacent to the village sign distant glimpses of the site do open up, these views are foregrounded by existing development (**vp4**). As the road rises and heads in a north easterly direction the roadside planting thins out offering intermittent views of the site's northern field. There is approximately a 50 metre stretch, adjacent to agricultural access to this field where the site, which sits directly next to the roadside is fully visible (**vp5**).

4.18 Traveling south west along Stratford Road from Cosgrove roadside planting is limited, however medium to long distance views of the site are filtered by field boundary planting along the north eastern edge of the site (**vp6**).

A508/A422

4.19 Heading south along the A508 roadside planting provides a substantial screening to the site up until the roundabout where screening thins out and views of the site are on offer immediately to the east.

4.20 Views of the site heading north on the A422 are obscured by the roundabout's central mound and / or viewed within the context of a Travelodge, which fronting onto the roundabout.

Figure 61 Plan showing potential sensitive receptors for AL5, numbers are referenced in text on this page and shown in photos over pages 58-59



- Footpaths
- Potential Sensitive Receptor
- Watercourse



Visual sensitivity AL5

There are clear restrictions to developing in the eastern part of the site due to this area's sensitivity to receptors along the A5. Greater sensitivity needs to also be taken in developing areas along the northern and central parts of the site due to rising topography making these parts of the site particularly sensitive to views from the A5 and from the north and north east, along Stratford Road.

Figure 62 Viewpoint 1 looking east travelling south along the A5 just before Old Stratford Roundabout with a view of the western end of AL5 looking over foreground paraphernalia associated with the roundabout



Figure 63 Viewpoint 2 looking east from Old Stratford Road towards AL5 with a break in tree plant on the corner of the roundabout offering views into the site



Figure 64 Viewpoint 3 looking north across the eastern end of the AL5 from an elevated perspective with the River Great Ouse and Valley Parkland in the foreground

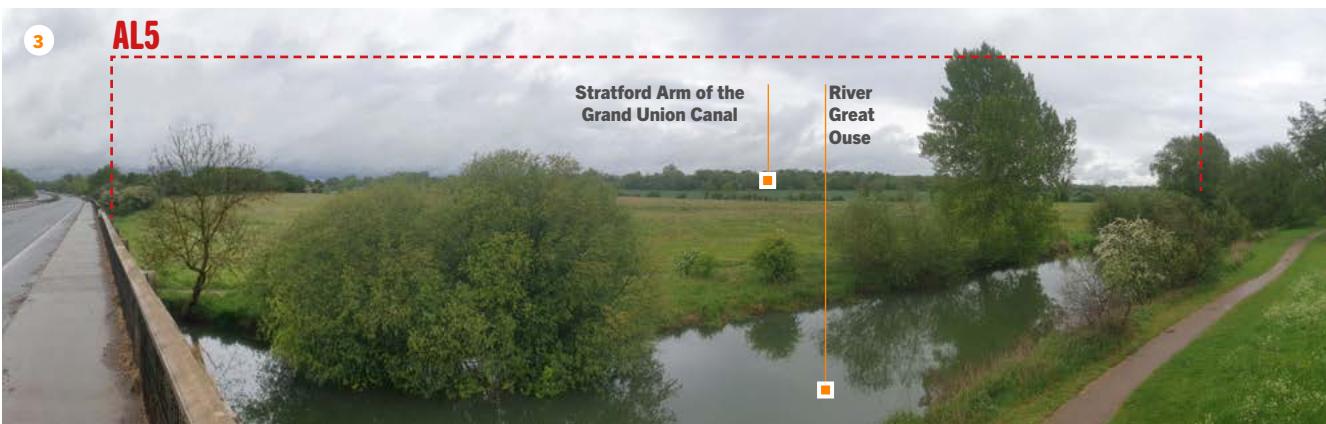


Figure 65 Viewpoint 4 looking south from Northampton Road towards the site screened/contextualised by foreground buildings and landscape along the local Brook & field boundaries

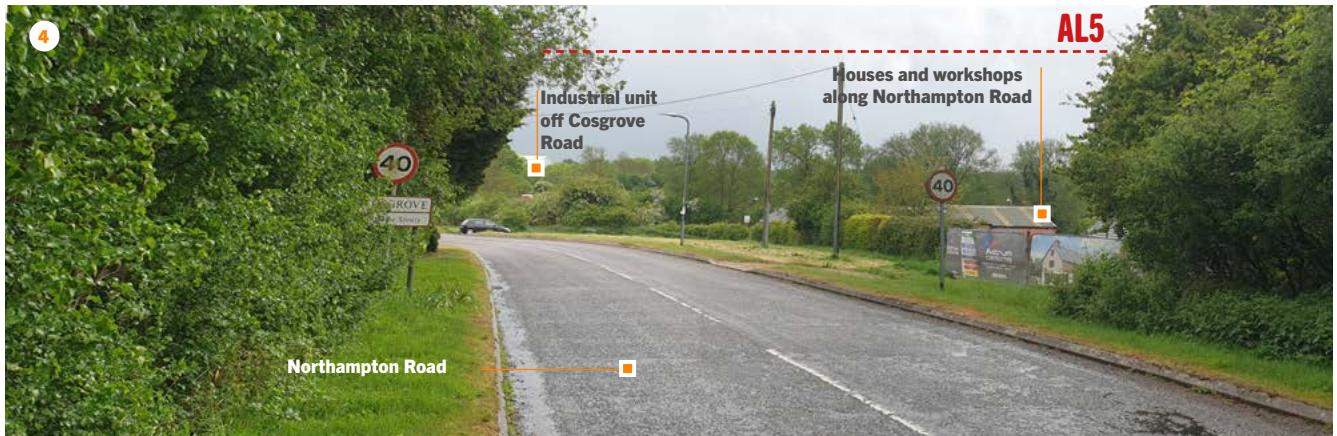


Figure 66 Viewpoint 5 looking southwest from Stratford Road across AL5 with views across a relatively flat field towards an existing industrial unit and tree planting along the Stratford Arm creating a certain level of screening from the south east/Ouse Valley Parkland



Figure 67 Viewpoint 6 looking southwest from Stratford Road towards AL5 with the relative flat land form and tree lined boundaries of the road, Stratford Arm fields breaking up views







Design Principles

5

5. Overarching Design Principles

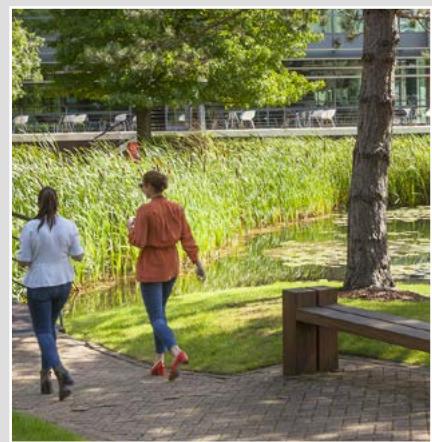
This section outlines a series of non-spatial overarching design principles that clearly express the need for a design-led approach to each of the four employment sites without dictating the form of that development.

5.1 The form and layout of employment development is dependent on various factors, such as the needs of the user and market conditions. It is therefore not possible to be overly prescriptive about design, allowing for a level of flexibility.

5.2 These principles should either be reflected in any development proposed for the four employment sites or be addressed in proposals, with a clear justification as to why any proposed development does not reflect them. *This justification could be based on a response to the contextual considerations outlined in section 3 or the four exemplar requirements set out in section 7.*

5.3 New development for each of the four employment sites should:

- Support Local Plan policy to deliver high quality development that is respectful of its setting.
- Ensure that development platforms are created to reduce the impact of the scale and massing of buildings on local character and the setting of the site, either in response to their height and/or the long & uniform ridge lines they may introduce.
- Seek to minimise any visual overbearance on short distance views, through measures such as landscape screening and elevational treatment, and avoid significantly altering the character of middle or long distance views.
- Incorporate high quality design solutions (including the use of material, colour palette, and/or architectural articulations) and landscaping to reduce the impact of building heights.
- Recognise and enhance existing landscape features and planting, where possible using traditional field patterns and woodlands as design inspiration.
- Where possible contribute to the area's wider green network, including habitat corridors and linkages.
- Use footpath, cycle, and road networks to support and encourage sustainable travel to and around the site.
- Ensure the council and public transport operators are consulted to help explore opportunities for funding public transport improvements, including frequency and access to services for future employees.
- Seek opportunities to address the existing road network in a positive manner, be that through new active building frontage and decorative planting or the retention and enhancement of existing native planted boundaries/edges.
- Seek to visually break up new areas of parking with planting, areas of permeable material and SUDs features such as dry or wet swales, allowing the absorption and channelling of surface water.
- Look to integrate movement, landscape and SUDs networks within the site by combining new or retained tree planting/hedgerow and SUDs provision along new roads.
- Limit the impacts on tranquillity of each site's rural setting, this includes minimising/mitigating any light, noise & air pollution or visual clutter (i.e.. advertising) resulting from the future operation of new buildings.







Assessment & Evaluation

6

6. Assessment and Evaluation

This section includes a series of development frameworks that illustrate spatial parameters for each of the sites. These attempt to avoid a prescriptive, one-size-fits-all approach and are based on individual site assessments, included in this section and the contextual considerations (section 3) and landscape & visual Assessment (section 4).

Site AL1 Assessment

High-level site assessment work has been undertaken using a combination of desk-based and site visit work. A range of key considerations have been identified from a contextual to site specific scale.

Surrounding Land Use & Scale

6.1 A cluster of uses, referred to as Bell Plantation are situated within the south western corner of the site, uses include garden centre, nursery, vet and play centre. Buildings are relatively small in scale, ranging from 4-10 metres in height.

6.2 Brickyard Farm, including farmhouse and ancillary buildings is situated on the eastern edge of the site. A complex of buildings, referred to as Bairstows Lodges are situated along the A5 to the west of the site.

6.3 There are a number of office, retail, light industrial and distribution uses situated around Tove Roundabout, refer to section 3 for further details.

Landscape

6.4 The northern half of the site comprises a single field while the southern half comprising two fields and Bell Plantation.

6.5 There are several blocks/belts of woodland within/adjacent to the site with an east west belt of woodland leading from its western edge to its centre, a block of woodland is located to the north of Brickyard Farm, and surrounding Bairstows Lodge.

6.6 Intermittent tree planting runs along the north eastern, north western, south western and southern boundaries

of the site. The scale of tree belts vary but more substantial mature tree belts are at an approximate height of 20 metres.

Topography

6.7 A central ridge line runs north south about halfway through the centre of the site, with a high of 110-115m AOD.

6.8 The northern half of the site primarily slopes westwards from this ridge line, gently dropping approximately 5 metres to its western/A5 edge.

6.9 The southern half of the site slopes from the ridge line in a south western, southern and south-eastern direction, dropping between 5-10 metres.

Views & Visual Sensitivity

6.10 There is a need for greater sensitivity in developing areas along the northern and north eastern edges of the site due to the rising topography and rural character of the land making this part of the site sensitive to receptors from the north, east and west, across the countryside from several PRoWs and country road (*refer to section 4 for further details*).

Access & Movement

6.11 There is a continuous, at grade frontage of approximately 650 metres onto the A5 along the western edge of the site, this excludes the Bell Plantation frontage (approximately 300 metres).

6.12 PRoW SB1 runs along the north eastern edge of the site for approximately 400 metres, while a potential link into the south-eastern corner of the site is provided from PRoW SB52, situated along Old Tiffield Road.

6.13 A continuous footpath runs along the A5 into the centre of Towcester joined onto by PRoW SB7, that connects west to Duncote.

Ecology

6.14 No ecological surveys have been undertaken. Any planning application should be supported by relevant ecological survey work.

Heritage

6.15 AL1 is situated approximately 550 metres from the north western boundary of the Easton Neston House Conservation Area and Historic Park and Garden, with the A43, housing and employment development situated between it and the protected estate.

6.16 Towcester Conservation Area, including a clustering of listed buildings is approximately 700 metres south of the site.

6.17 There are two grade II listed buildings at the southern end of Caldecote approximately 300 metres north of the site.

Assessment Plan AL1

- Flood Plain Area
- Easton Neston House (Parks and Gardens Register/ Conservation Area)
- Listed Building
- High Point
- ▼ Low Point
- Footpaths
- △ Potential Sensitive Receptor
- Watercourse
- Ridge line

Figure 68 Plan of AL1 illustrating site assessment issues



Site AL1 Development

The development framework for AL1 establishes key parameters and principles.

Access & Movement

6.18 The development framework AL1 provides a number of key access points into the site off the A5. These include an access located to the immediate north of the Bell Plantation and an access half way along the northern field boundary. New link roads to lead off these access points to utilise all parts of the development areas, including an access to any sports pitches.

6.19 The development framework AL1 includes new east west active travel routes that link the A5 footpath with PRoW SB1. Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of a lighting plan and consistent use of wayfinding/signage should be considered.

Drainage

6.20 The development framework AL1 sets out an integrated and attractive sustainable drainage network with swales located along woodland edges, the site's A43 frontage and a central green link, directing and filtering surface water to a series of basins located on the site's periphery. Opportunities for this network to offer ecological value should be explored as should the introduction of rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes. Ultimately the location of SUDs will need to be informed by a drainage strategy, and may vary depending on site phasing.

Green Infrastructure

6.21 The development framework AL1 proposes green infrastructure that comprises a series of enhanced and new edges/belts of woodland/hedgerow planting and areas of green space. New substantial landscape edges/buffers, with tree planting are shown as a requirement along the northern, eastern and western perimeter to mitigate visual impact of any new buildings in the framework's northern area of development.

6.22 A green link helps separate development in the northern and southern halves of the site, cutting east west across it. This link could comprise an active travel route and a SUDs basin situated within one of the areas of green space. An existing belt of juvenile woodland could be removed to ensure the link is overlooked by new buildings, enhancing its safety and accessibility.

6.23 The southern half of the site is broken up by a series of narrower belts of landscape, these run north south separating new development from land earmarked for Towcester Football Club (TFC). The siting of TFC's pitches is not currently defined in policy, as such these could be accommodated in an alternative location if justified.

6.24 The southern end of the site accommodates the key area of green space within the framework, potentially incorporating a SUDs basin.

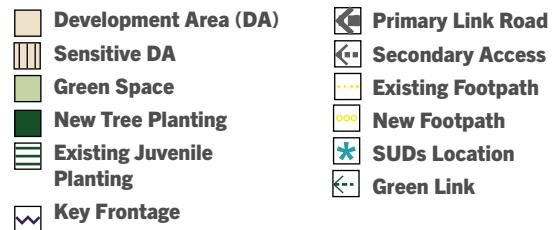
Building Height, Scale and Massing

6.25 Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 16m in height, and being effectively screened from sensitive views by either existing or proposed tree planting. Large buildings, which have a greater impact i.e. are visible above tree cover / from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering the highest design quality and a thorough programme of landscape measures.

Placemaking / Urban Form

6.26 The development framework AL1 suggests a series of key frontage opportunities across areas of new development, including along both the central green link / SUDs parkland, the A43, mirroring frontage on the southern side of the road, and the A5 adjacent to an access to the northern area of development. These frontages would require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building facade can be created.

Development framework AL1



Key Features

- | | | | |
|----------|---|-----------|---|
| 1 | Northern development area (approx. 18 ha.) | 6 | East West Green Link with key frontage treatment and active travel link |
| 2 | Southern Development Area (approx. 12 ha.) | 7 | Access off A5 to both employment land and sports pitches |
| 3 | Sensitive development area along northern and north eastern site edge | 8 | East-west footpath link between existing paths |
| 4 | Towcester Football Club Sports pitches (6 hectares) | 9 | Enhanced woodland edge treatment |
| 5 | New A43 Corridor frontage | 10 | Enhanced planted A5 frontage |

Site AL2 Assessment

High-level site assessment work has been undertaken using a combination of desk-based and site visit work. A range of key considerations have been identified from a contextual to site specific scale.

Surrounding Land Use & Scale

6.27 A cluster of uses, referred to as Bell Plantation is situated to the east of AL2 and the A5. Land uses include garden centre, nursery, vet and play centre. Buildings are relatively small in scale, ranging from 4-10 metres in height.

6.28 Jardines, a car forecourt is located to the south of AL2 and Towcester Road. The building associated with this use is below road level, rising to approximately 8 metres in height.

6.29 Linden Barn Food Shop, Towcestrians Sports Club and a series of agricultural buildings sit to the west of AL2, along or just off Towcester Road. The food shop sits approximately 200 metres west of the site and comprises a series of 5-7 metre high buildings. The sports club sits approximately 250 metres to the north west of the site and comprises a single 1,000m² building, approximately 6 metres high surrounded by sports facilities, including tennis courts and sports pitches.

6.30 There are a number of office, retail, light industrial and distribution uses situated around Tove Roundabout, refer to section 3 for further details.

Landscape

6.31 AL2 is bound by a substantial belt of woodland along its western edge, this boundary follows a watercourse that feeds south into the River Tove. Hedge and low-level tree planting provides a thin planted roadside edge to the eastern and southern boundaries of the site, while the northern countryside edge includes a fence line with intermittent hedgerow planting.

6.32 The south eastern corner of the site is planted with semi-mature trees, this structured planting is likely to have been introduced as part of works associated with Tove Roundabout and provides an element of visual screening.

Topography

6.33 AL2 gently slopes by approximately 8 metres from its eastern A5 edge (100m AOD) to its western edge, along a watercourse (90m AOD).

Flooding

6.34 Along the western edge of the site flood zones 2 and 3 follows the watercourse. Zone 3 is contained within the watercourse itself with zone 2 spreading no further than 10 metres into the south western corner of the site.

Views & Visual Sensitivity

6.35 There is a need for greater sensitivity in accommodating new development within the north eastern and south eastern corners of the site due to views offered when approaching south along the A5 and west along the A43 (*refer to section 4 for further details*).

Access & Movement

6.36 There is a continuous, at grade frontage of approximately 120 metres onto the A5, along the eastern edge of the site. There is a continuous, at grade frontage of approximately 180 metres onto Towcester Road, along the southern edge of the site.

6.37 A footpath runs along the eastern edge of the A5, providing a continuous footpath that links into the centre of Towcester. There are no footpaths currently along Towcester Road.

Ecology

6.38 No ecological surveys have been undertaken. Any planning application should be supported by relevant ecological survey work.

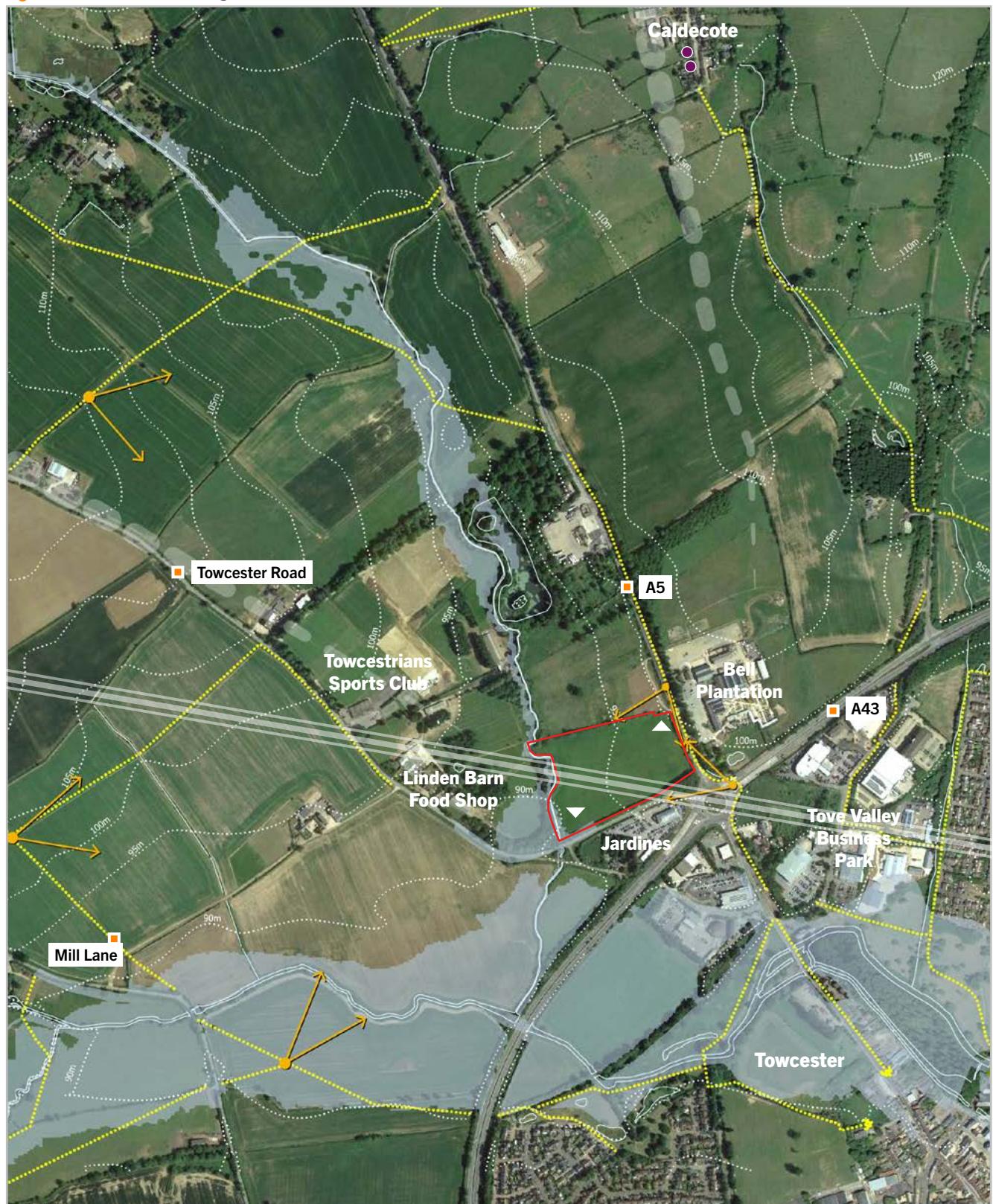
Heritage

6.39 AL2 is roughly 1km west of the boundary of the Registered Park and Garden/Conservation Area of Easton Neston House, with the A43, housing and employment development situated between it and the protected estate. AL2 sits on the alignment of a tree-lined avenue in front of the House, this once provided a visual link from the House to the church in Greens Norton. Although any relationship is largely severed by intervening development future proposals for AL2 should consider views along this alignment when preparing the arrangement, height and massing of any built form.

6.40 Towcester Conservation Area, including a clustering of listed buildings is approximately 700 metres south of the site.

Assessment Plan AL2

Figure 69 Plan of AL2 illustrating site assessment issues



Site AL2 Framework

The development framework for AL2 establishes key parameters and principles.

Access & Movement

6.41 The development framework AL2 provides a key access point into the site off Towcester Road / Greens Norton Road, from the south. The access is to be sited at least 100 metres from Tove Roundabout.

6.42 Active travel provision to the site is currently provided along the existing footpath on the A5. In addition to ensuring safe, comfortable and direct connection to this path for pedestrians any development should also explore providing a new pedestrian connection to Tove Roundabout from along Towcester Road.

6.43 Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of a lighting plan and consistent use of wayfinding/signage should be considered.

Drainage

6.44 The development framework AL2 sets out an integrated and attractive sustainable drainage network with swales located along green and woodland edges directing and filtering surface water to a basin located on the site's periphery. Opportunities for this network to offer ecological value should be explored as should the introduce rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes.

Green Infrastructure

6.45 The development framework AL2 proposes introducing new tree planting to reinforce the northern, eastern and southern edges of any new development. These will link up to the existing tree-lined watercourse along the western edge of the site and extensive belt of tree planting along Towcester Road.

6.46 In addition the development framework AL2 shows the inclusion of green space along the edges of any development with a larger green space at the south western corner, incorporating a SUDs basin. These will allow for any development to be setback from the enhanced planted boundary treatments.

Height, Scale and Massing

6.47 Small and medium sized building will be acceptable where there is no significant visual impact, likely rising to approximately 10-12 metres in height, and being effectively screened from sensitive views by either existing or proposed tree planting. The site's size and proximity to development of a moderate scale adjacent to the Tove Roundabout is likely to prohibit large buildings, which have a greater impact i.e. are visible above tree cover / from longer distances or affect the character of the area in which they sit. These will only be considered in exceptional

circumstances if acceptable mitigation is provided such as delivering the highest design quality and thorough programme of landscape measures.

Placemaking / Urban Form

6.48 The development framework AL2 suggests a key frontage opportunity onto the Tove Roundabout and along Towcester Road. These frontages would require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building facade can be created.

6.49 There may be an opportunity to address stretches of the site's A5 & Towcester Road frontage, adjacent to the roundabout with a bolder form and scale. Building orientation & treatment and landscape proposals could help contribute a new gateway frontage into Towcester.

Development framework AL2

	Development Area (DA)		Primary Link Road
	Sensitive DA		Secondary Access
	Green Space		Existing Footpath
	Key Green Space		New Footpath
	New Tree Planting		SUDs Location
	Key Frontage		Green Link



Key Features

- 1 Development area (approx. 2.5 ha.)
- 2 New SUDs pocket park
- 3 Key gateway frontage along the A5 and Towcester Road
- 4 Access off Towcester Road
- 5 Substantial northern woodland edge treatment
- 6 Enhanced planting along sections of Towcester Road and A5 edges
- 7 Open space edge integrated with adjacent watercourse

Site AL4 Assessment

High-level site assessment work has been undertaken using a combination of desk-based and site visit work. A range of key considerations have been identified from a contextual to site specific scale.

Surrounding Land Use & Scale

6.50 Silverstone Business Park is situated on the western edge of AL4, it and Silverstone Field Farm are detailed further in section 3.

Landscape

6.51 AL4 comprises three irregularly shaped fields, whose shape has, in part been caused by the development of adjoining infrastructure.

6.52 Its boundary with the A413 is a mix of hedgerow and semi-mature tree planting. Its western edge, along the access route to the Silverstone Business Park and around the edge of the Business Park is defined by a broad hedgerow and block of woodland planting that surrounds a pond feature.

6.53 Hedgerow field boundaries define the remaining edges and cut across the centre of the site. A small block of tree planting is situated centrally within AL4.

Topography

6.54 The site gently slopes in a westerly direction, dropping approximately 10 metres, from 130m AOD to 120m AOD at a local pond feature within AL4's western edge.

Views & Visual Sensitivity

6.55 There is a need for greater sensitivity in developing areas at the southern and eastern corners of the site due to the site's position on rising land making this part of the site particularly sensitive to receptors from the south and west (*refer to section 4 for further details*).

Access & Movement

6.56 The A413 provides a continuous, at grade frontage of approximately 320 metres along the north eastern edge of the site. Existing tracks run along the north-western edge and through the centre of the site, providing access to Silverstone Business Park.

6.57 There are currently no footpaths within the vicinity of AL4.

Ecology

6.58 No ecological surveys have been undertaken. Any planning application should be supported by relevant ecological survey work.

Heritage

6.59 AL4 is situated approximately 800 metres from Lordsfield Farm Moat, a Scheduled Ancient Monument.

Assessment Plan AL4

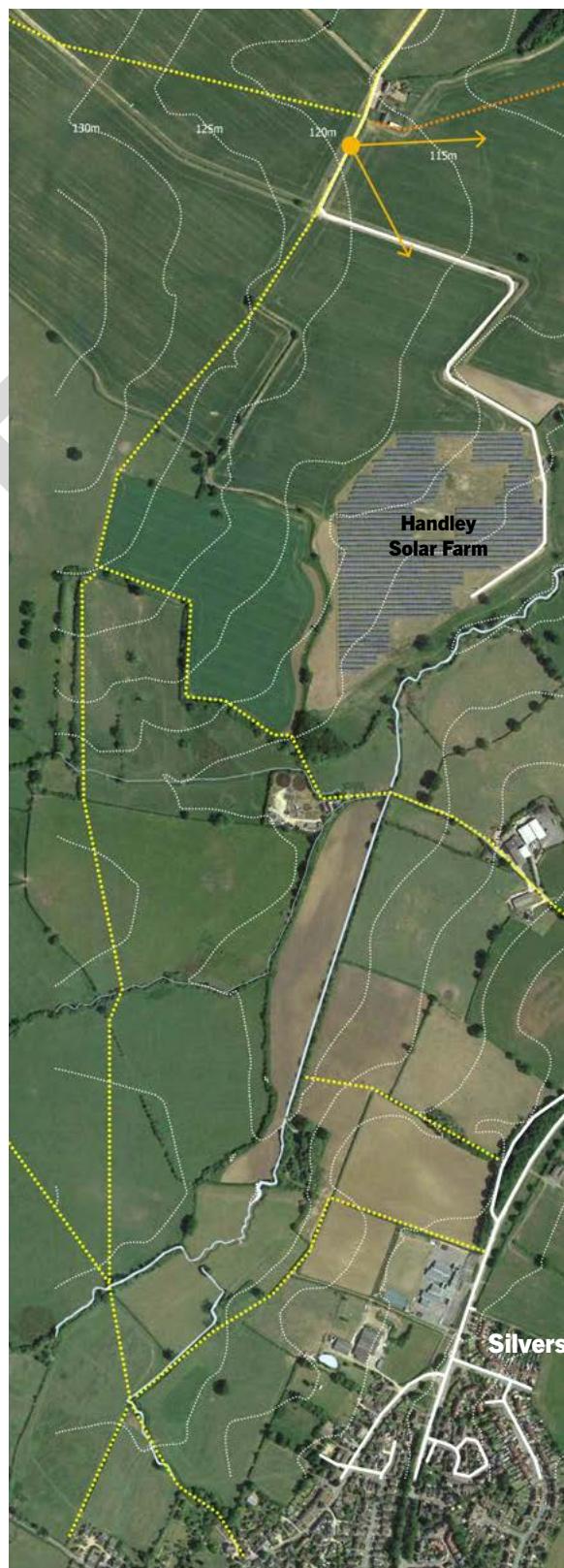


Figure 70 Plan of AL4 illustrating site assessment issues

- | | | | |
|--|----------------------------|--|------------------------------|
| | Scheduled Ancient Monument | ■ | Footpaths |
| ● | Listed building | □ | Potential Sensitive Receptor |
| ▲ | High Point | □ | Watercourse |
| ▼ | Low Point | □ | Ridge line |



Site AL4 Development Framework

The development framework for AL4 establishes key parameters and principles.

Access & Movement

6.60 The development framework AL4 provides an access point into AL4 off the existing access road to Silverstone Business Park. A new link road then links south and east into two development areas.

Drainage

6.61 The development framework AL4 sets out an integrated and attractive sustainable drainage network with swales located along green and woodland edges directing and filtering surface water to a series of basins located on the site's periphery. Opportunities for this network to offer ecological value should be explored as should the introduce rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes.

Green Infrastructure

6.62 The development framework AL4 introduces belts of woodland and hedgerow planting, primarily enhancing existing field boundaries in and along the edge of the site. The most substantial planting shall be sited along the southern

edge of the two development areas, helping to mitigate the visual impact of development from the south. Where this planting abuts the solar farm its height and location will need to avoid overshadowing any solar panels. A continuous green edge will be introduced along the A413 reinforcing the existing tree and hedgerow planting.

6.63 A potential central belt of green space and planting could cut north south through the site separating two areas of development.

6.64 The SUDs basin, block of woodland and pond feature will be setback from development by an area of green space.

Height, Scale and Massing

6.65 The appropriate scale of buildings on AL4 is likely to be small to medium due to its topography, irregular shape and proximity to Silverstone Business Park, an area with small to medium units. This may see development rise to approximately 10-15 metres in height. The site's capacity to accommodate large units is further limited by restricted

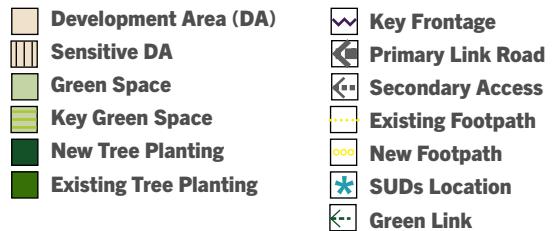
access onto the A43, with no direct southbound slip road access onto the A43 - alternative southbound access is provided via Silverstone.

6.66 Large units, which have a greater impact i.e. are visible above tree cover / from longer distances or affect the character of the area in which they sit, will only be considered in exceptional circumstances if acceptable mitigation is provided such as delivering the highest design quality and thorough programme of landscape measures.

Placemaking / Urban Form

6.67 The development framework AL4 suggests a key frontage onto the central belt of planting/green space and northern access road. This frontage would require a considered approach to building orientation, materiality and massing. Ensuring the introduction of an attractive, particularly when viewed from a distance heading northbound along the A413 and, where possible, active building facade.

Development framework AL4



Key Features

- | | | | |
|----------|---|----------|---|
| 1 | Eastern Development area (approx. 3.5 ha.) | 5 | Key frontage onto central belt of planting |
| 2 | Western Development Area (approx. 3.5 ha.) | 6 | Access off existing road to Silverstone Business Park |
| 3 | Sensitive development area at eastern and southern ends of site | 7 | Enhanced southern woodland edge treatment, height considered in relation to potential impact on adjacent solar farm |
| 4 | New SUDs green space | 8 | Enhanced planting along A413 edge |

Site AL5 Assessment

High-level site assessment work has been undertaken using a combination of desk-based and site visit work. A range of key considerations have been identified from a contextual to site specific scale.

Surrounding Land Use & Scale

6.68 Along the southern edge of the site is a storage/distribution unit, at about 10-12 metres high this sits next to the A5 at the end of Cosgrove Road.

6.69 There are a mix of uses fronting onto/adjacent to the Old Stratford Roundabout with Travelodge, a car forecourt, offices, gym, restaurant and area of new housing. These buildings range in height from 6 to 10 metres.

6.70 Detached residential properties and small workshop units are strung along the Northampton/Stratford Road to the north of the site.

Landscape

6.71 Site is made up of irregularly shaped arable fields bound by a mix of riparian, shrub and semi-mature tree planting.

6.72 More substantial belts and clusters of tree planting run along the Stratford Arm of the Grand Union Canal, along the western edge of the eastern most field and to the north of the site and Stratford Road.

6.73 More structural planting is situated along the key roadside boundaries, particularly the A5 where an embankment separates the road from the site.

Topography

6.74 The site gently slopes down to the Dogsmouth Brook at 65-70m AOD as it passes through the site east west, firstly along its north western edge and then through its centre. This represents a 12 metre drop from a high of 80m AOD in the northern half of the site and a 7 metre drop from a high of 75m AOD in the south half of the site.

6.75 Artificial land form changes are evident at the A5, which has been cut through the landscape leaving an embankment along the site's southern edge.

Flooding

6.76 Flood zone 2 and 3 closely follows the routing of Dogsmouth Brook through the site, with the former expanding out in the centre of the site. The flood risk extends eastwards to follow the Ouse Great River, which flows to the east and south of the site.

Views & Visual Sensitivity

6.77 There are clear restrictions to developing in the eastern part of the site due to this area's sensitive to receptors along the A5. Greater sensitivity needs to also be taken in developing areas along the northern and central parts of the site due to rising topography making these parts of the site particularly sensitive to views from the A5 and from the north and north east, along Stratford Road (*refer to section 4 for further details*).

6.78 Access & Movement

6.79 There is a continuous frontage onto the A508 of approximately 400 metres, the majority of which is continuous and at grade along AL5's western boundary.

6.80 There is an existing network of paths that link west, under the A508, south east, under A5 to Ouse Valley Park/ Old Stratford (PRoW RS16 & 17) and east to Cosgrove along the Grand Union Canal (PRoW RG6 & 9).

Ecology

6.81 No ecological surveys have been undertaken. Any planning application should be supported by relevant ecological survey work.

Heritage

6.82 Conservation area, the Stratford arm of the Grand Union Canal cuts through the centre of the site. There is another conservation area that extends south from Cosgrove, sitting approximately 300 metres to the north east of the site along Stratford Road.

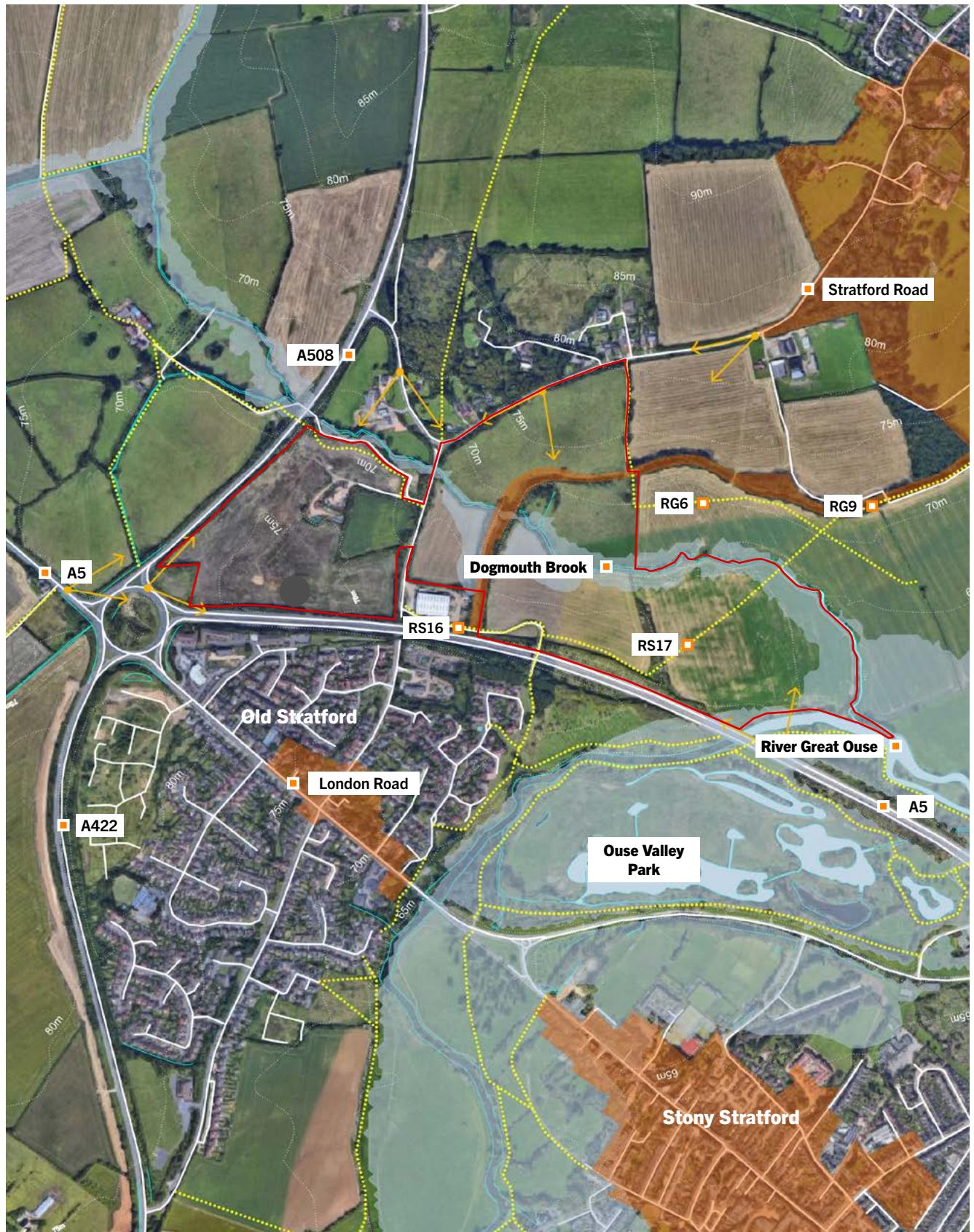
6.83 There is a line of listed buildings along London Road in Old Stratford, an area identified as a Conservation Area, approximately 300 metres south of the site.

6.84 There is a Scheduled Monument called 'Motte and Bailey Castle' Deserted Village and Monastic Grange at Old Wolverton, approximately 800 metres east of AL5.

Flood Plain Area	Footpaths
Conservation Area	Potential Sensitive Receptor
Scheduled Ancient Monument	Watercourse
High Point	
Low Point	

Assessment Plan AL5

Figure 71 Plan of AL5 illustrating site assessment issues



Site AL5 Development Framework

The development framework for AL5 establishes key parameters and principles.

Access & Movement

6.85 The development framework AL5 provides access into the site off the A508, with a new roundabout midpoint between Old Stratford Roundabout and the road's flyover of the Dogmorth Brook and the other from along Stratford Road.

6.86 The A508 access provides a link east west through the site, crossing the Cosgrove Road to access a small field to the north of the existing industrial unit before veering northwards to gain access to land north of Dogmorth Brook/ Stratford Arm of the Grand Union Canal.

6.87 New active travel routes need to connect up to the existing A5 pedestrian overpass link from Old Stratford to create a highly accessible employment area. New paths should enhance access and interaction with a new wetland corridor, along the Dogmorth Brook, the Stratford Arm of the Grand Union Canal and potential extension to the Ouse Valley Parkland in the east of the site.

6.88 Any new and enhanced footpaths should add to a legible and safe active travel network for the area, as such the provision of a lighting plan and consistent use of wayfinding/signage should be considered.

Drainage

6.89 The development framework AL5 sets out an integrated and attractive sustainable drainage network with swales located along green and woodland edges directing and filtering surface water to a series of basins located along a central wetland corridor. Opportunities for this network to offer ecological value should

be explored as should the introduce rain gardens and permeable surfacing within hard surface areas and along key vehicular and active travel routes.

Green Infrastructure

6.90 The development framework AL5 sets out an integrated blue and green network with a green accessible wetland corridor running east west through the centre of the site. The corridor follows Dogmorth Brook and incorporates SUDs provision and footpaths with attractive development frontage overlooking it. New riparian, hedgerow, decorative shrub and tree planting situated along the new wetland corridor, the key site edges (including Northampton/Stratford Road, A508 and the eastern countryside edge) and the Stratford Arm of the Grand Union Canal help create green infrastructure for wildlife in the area and frame pockets of new development.

6.91 The development framework AL5 proposes the site's eastern & central field and wetland corridor be retained as managed open countryside with the future potential to form an expansion to Ouse Valley Park, comprising enhancements to footpath access and habitat creation. This approach will help safeguard impacting the setting of the existing river parkland and scheduled monument further east.

Building Height, Scale and Massing

6.92 The western end of AL5 may be able to accommodate a mix of unit sizes given its direct access off the A508 and general limited exposure to views. This may see development rise to

approximately 10-15 metres in height, in line with the existing storage unit, with effective screening to be provided from sensitive views by either existing or proposed tree planting. Small to medium sized buildings are most likely to be acceptable on land that sits along, or to the north of the Brook & Stratford Arm. Any development located in these areas should be accompanied by a strong and integrated schedule of landscape screening.

6.93 Large buildings/units, which have a greater impact i.e. are visible above tree cover/from longer distances or affect the character of the area in which they sit, will need to provide robust mitigation such as delivering the highest design quality and a thorough programme of landscape measures.

Placemaking / Urban Form

6.94 The development framework AL5 suggests a series of key frontage opportunities at the Old Stratford Roundabout/A508 and along the new green accessible wetland corridor. These frontages would require a considered approach to building orientation, materiality and massing to ensure an attractive and, where possible active building facade can be introduced, particularly on the roundabout. The site's proximity to both the Grand Union Canal and Ouse Valley Parkland presents opportunities to build a connection to both these local assets through interpretative signage/public art within the landscape framework for the site.

Development Framework AL5

	Development Area		Key Frontage
	Sensitive Area		Existing Footpath
	Green Space		New Footpath
	Key Green Space		New Tree Planting
	Primary Link Road		Existing Tree Planting
	Secondary Access		SUDs Location



Key Features

- 1 Western and Southern Development Areas
- 2 Areas abutting sections of Dogmouth Brook and Stratford Arm to be treated sensitively
- 3 Eastern & central field and section of the brook to be retained as open countryside / a potential future expansion to Ouse Valley Park
- 4 Key vehicular access off A508
- 5 New accessible green wetland corridor with SUDs provision
- 6 Network of new east west and north south footpaths.
- 7 Key frontages onto Old Stratford Roundabout
- 8 Key frontages along new wetland corridor
- 9 Retain and enhance blocks and belts of woodland within the site
- 10 New woodland to mitigate views of development from Northampton/Stratford Road and A5





Exemplar Development & Flexibility

7

7. Exemplar Development

West Northamptonshire Council wish to see the allocated employment sites brought forward following a design-led approach, that sees the delivery of contextually appropriate high-quality buildings situated within an attractive landscape setting.

We understand that the market is in constant motion and therefore the factors affecting the form and type of development proposed across these employment sites will change over time. The need to be flexible is vital.

This SPD sees that underpinning this flexibility to market conditions will be a design-led approach that helps facilitate the delivery of exemplar development that is aligned to the following four key requirements.

Exemplar in Sustainability and Zero-Carbon Development

7.1 The Applicant will need to explore and demonstrate the delivery of measures that enhance the development's sustainability, pushing it towards a zero carbon development. This should take account of all aspects of construction from the supply chain to building design and its lifecycle, as well as the environment in which it sits.

Exemplar in Architecture and Design

7.2 The highest quality of design will help deliver a landmark building for the wider community as well as a high-quality working environment for employees.

7.3 Over the course of a building's lifetime change is inevitable therefore any design should factor in the capacity for new buildings to be adaptable, accommodating substantial change in the future. This should be considered in relation to the building's structure, cladding and services.

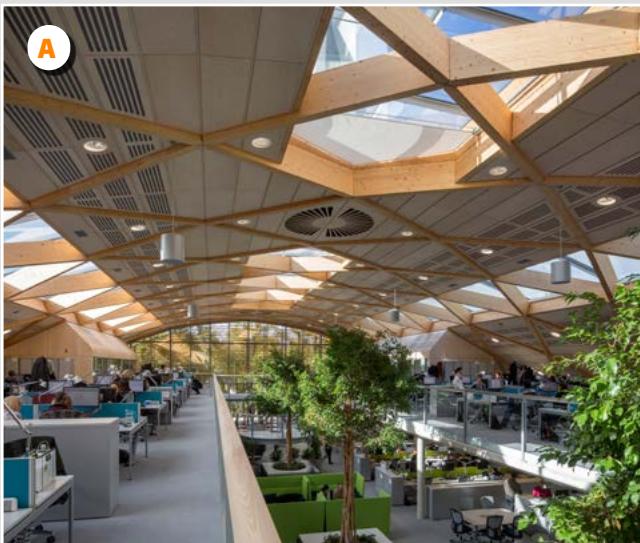
Exemplar in Landscape Design and Placemaking

7.4 The quality of landscape design will be crucial to create a beautiful place and one that will provide a setting for high-quality buildings to stand the test of time.

- A High quality working environment
- B District heating system
- C High quality architectural detailing and material
- D High quality landscape design with integrated SUDs
- E Apprenticeship programmes
- F Green roof buildings

Exemplar in Job Creation and Economic and Social Benefit

7.5 The opportunity for development proposals to demonstrate the ability to deliver exceptional employment opportunities that have a wider economic and social benefit to the local community as well as across the council area.







Summary & Conclusion

8

8. Summary & Next Steps

8.1 This draft SPD is intended to help guide the future design and development across each of the four employment allocations AL1, AL2, AL4 and AL5 as set out within the Part 2 Local Plan. This SPD will be a material consideration in the determination of any planning application(s) across the sites.

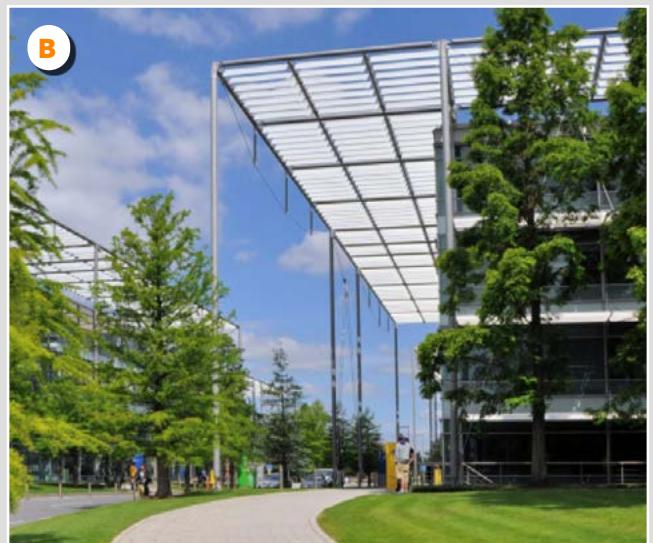
8.2 This SPD has considered the wider policy context within which this SPD has been prepared. There has also been detailed consideration into the context, guiding principles and development parameters that need to be taken into account across each of the sites. This has included a thorough understanding of the physical constraints and opportunities that exist.

8.3 The purpose of the SPD is to improve the planning and development process by reducing uncertainty and clearly setting out guidance on what is expected from development proposals. The SPD will bring together the policy framework with clear guiding principles for the future development of the sites.

8.4 Interested parties are now encouraged to make representations (comments) to this draft SPD. Comments are required in writing and need to be submitted by 4.30 Closing Date.

8.5 Following the consultation, all comments will be carefully considered and where appropriate amendments will be made to the SPD. A summary of all comments and the Council's response will be clearly detailed within a Statement of Consultation. The Council will then be asked to formally agree the SPD, at which point it will sit alongside the development plan and can be used in the determination of planning applications.

- A Facade treatment with projected building elements accentuating corner of and entry to building.
- B Strong landscape framework helping to integrate buildings into a landscape setting.
- C Creating or enhancing natural / ecological assets that provide an attractive outlook for employees.
- D Feeding structural hedge and tree planting up to edge of building, along access roads and through areas of parking.







Appendix

LDP Design Briefs

A

A. LDP Design Briefs

This appendix includes the Design Briefs for each of the four policy sites, extracted from the Part 2 Local Plan.

AL1: Land at Bell Plantation, Towcester

- 1** Development description: located to the north of Towcester on land associated with and including the Bell Plantation and adjoining the A43 and A5, this development site provides for 35ha of mixed employment generating development together with 6ha of land for the creation of a Towcester Town Football Club home ground. A variety of employment types will be sought to reflect the need for diversity and resilience in the local economy as expressed in the council's economic growth strategy.
- 2** An integrated, coordinated and comprehensive planning approach will be taken for the site and a masterplan must be prepared, in consultation with the local planning authority and the local highway authority, Towcester Town Council and other statutory undertakers prior to the submission of a planning application covering the development of the whole site.
- 3** Land Uses: Employment
 - a**. An independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.
- 4** Land uses: Towcester Town Football Club
 - a**. 6ha to be provided within the allocated site with the precise location dependent on suitable topography; and
 - b**. The design and layout of the employment element of the mixed use site should be compatible with, and not prejudice the delivery of, the football facilities.
 - c**. Funding for the football club may be funded in part by contributions from the Council's Community Infrastructure Levy.
- 5** Access and transport
 - a**. Access to the employment site to be from the A5; and
 - b**. access to the football club site to be provided by the developer of the employment part of the site, from either within the employment site or from a new separate access from the A5 and provision of an unfettered road access point to the edge of the football club site; and
 - c**. good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services and promote sustainable travel; and
 - d**. a transport assessment and travel plan will be required to assess the transportation implications of the proposed development and to identify appropriate mitigation measures; and
 - e**. provision of new footpaths and cycleways that link to existing networks and safe crossing points on the A43.
- 6** Key site specific design and place shaping principles (whole development), in addition to those required under policy SS2 include:
 - a**. a detailed heritage impact assessment will be required for the whole site, to be agreed with the Local Planning Authority in consultation with Historic England, prior to the design of the scheme in order to inform the height of any proposed buildings, layout and extent of the development. This will explicitly include an assessment of the height of any new buildings and impact on the Easton Neston Grade II* Registered Park and Garden as well as detailed consideration of any impacts on designated and non-designated heritage assets and subject to the assessment being agreed a programme of informed mitigation to be included with any application; and
 - b**. a detailed strategic landscape assessment of the whole site to deliver a high quality landscaped setting within and around the boundary of the proposal; and
 - c**. prior to submission of an application, detailed assessment for the whole site to characterise archaeological remains and identify direct impact of development proposals to inform design and a programme of archaeological mitigation; and
 - d**. provision of utilities up to the edge of the site for the football club; and e. appropriate financial contributions to mitigate the impact of the development.

AL2: Land at Woolgrowers Field, Towcester

- 1** Development description: located to the north of Towcester bounded by the A5 to the east and Towcester road and the A43 to the south, this development site provides for 4.5 hectares of mixed employment generating development. A variety of employment types will be sought to reflect the need for diversity and resilience in the local economy as expressed in the council's economic growth strategy.
- 2** An integrated, coordinated and comprehensive planning approach will be taken for the employment site and a masterplan must be prepared, in consultation with the local planning authority, the local highway authority and other statutory undertakers prior to the submission of a planning application covering the development of the whole site.
- 3** **Land Uses: Employment**
 - a.** An independently assessed, market-evidenced proportion of B1 (business), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.
- 4** **Access and transport**
 - a.** Access to the employment site to be from the A5 and/or the Greens Norton Road; and
 - b.** good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services and promote sustainable travel; and
 - c.** a transport assessment and travel plan will be required to assess the transportation implications of the proposed development and to identify appropriate mitigation measures; and
 - d.** provision of new footpaths and cycleways that link to existing networks and safe crossing points on the A43.
- 5** Key site specific design and place shaping principles (whole development), in addition to those required under Policy SS2 include:
 - a.** a detailed heritage impact assessment will be required for the whole site to be agreed with the Local Planning Authority in consultation with Historic England, prior to the design of the scheme in order to inform the height of any proposed buildings, layout and extent of the development. This will explicitly include an assessment of the height of any new buildings and impact on the Easton Neston Grade II* Registered Park and Garden as well as detailed consideration of any impacts on designated and non-designated heritage assets and subject to the assessment being agreed a programme of informed mitigation to be included with any application; and
 - b.** prior to submission of an application, detailed assessment for the whole site to characterise archaeological remains and identify direct impact of development proposals to inform design and a programme of archaeological mitigation; and
 - c.** a detailed strategic landscape assessment of the whole site to deliver a high quality landscaped setting within and around the boundary of the proposal.

AL4: Land at Shacks Barn, Whittlebury

- 1** Development description: located an important position adjoining the A43, southwest of Towcester, close to the Whittlebury junction, this development site provides for 10ha of mixed employment generating development. An integrated, coordinated and comprehensive planning approach will be taken and a masterplan must be prepared, in consultation with the Local Planning Authority and statutory undertakers prior to the submission of a planning application covering the development of the whole site.
- 2** Land uses employment a. An independently assessed, market-evidenced proportion of B1 (office), B2 (general industrial) and B8 (storage and distribution) with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.
- 3** Access and transport
 - a.** Access to the site to be based on the existing access only; and
 - b.** Provision of new footpaths and cycleways that link to existing networks; and
 - c.** Good accessibility to public transport services should be provided for, including contributions to the cost of diverting existing routes through the site or to support existing local services to help promote sustainable travel as well as the enhancement of pedestrian cycling and walking links between the site and Towcester town; and
 - d.** A transport assessment and travel plan will be required to assess the transportation implications of the proposed development and to identify appropriate mitigation measures; and
- 4** Key site specific design and place shaping principles (whole development) in addition to those required under Policy SS2 include:
 - a.** A detailed heritage impact assessment will be required for the whole site, to be agreed with the Local Planning Authority in consultation with Historic England, prior to the design of the scheme in order to inform the height of any proposed buildings, layout and extent of the development. This will explicitly include an assessment of the height of any new buildings and impact on the Easton Neston Grade II* Registered Park and Garden as well as detailed consideration of any impacts on the designated and non designated heritage assets and subject to the assessment being agreed a programme of informed mitigation to be included with any application; and
 - b.** Prior to submission of an application, detailed assessment for the whole site to characterise archaeological remains and identify direct impact of development proposals to inform design and a programme of archaeological mitigation; and
 - c.** A detailed strategic landscape assessment of the whole site to deliver a high quality landscaped setting within and around the boundary of the proposal; and d. Appropriate financial contributions to mitigate the impact of the development on services and facilities as required by the council's policies.

AL5: Land at Former Furtho Pit, Old Stratford / Cosgrove

- 1** Development description: located at an important position adjoining the A5 and A508, this development site provides for 16 ha. of mixed employment generating development. A variety of employment types will be sought to reflect the need for diversity and resilience in the local economy as expressed in the council's economic growth strategy.
- 2** An integrated, coordinated and comprehensive planning approach will be taken for the employment site and a masterplan must be prepared, in consultation with the local planning authority, the relevant highway authorities and other statutory undertakers prior to the submission of a planning application covering the development of the whole site.
- 3** Land uses employment
 - a**. An independently assessed, market-evidenced proportion of B1 (business)(office), B2 (general industrial) and B8 (storage and distribution) with ancillary with supporting uses that are demonstrably subservient and complementary in both scale and nature to an existing or proposed B class use.
- 4** Access and transport
 - a.** Access from a new roundabout junction from the A508; and
 - b.** Provision of new footpaths and cycleways that link to existing networks including to a proposed new adjoining country park and utilising the existing pedestrian crossing over the A5 linking to Old Stratford having appropriate regard to the retention and enhancement of the existing public rights of way through the site; and
 - c.** Good accessibility to public transport services should be provided for including contributions to the cost of establishing bus services including stops to the site, to promote sustainable transport; and d. A transport assessment and travel plan will be required to assess the transportation implications of the proposed development (including noise from the A5 and A508) and to identify appropriate mitigation measures
- 5** Key site specific design and place shaping principles (whole development); in addition to those required under Policy SS2 include: a detailed heritage impact assessment will be required to be agreed with the local Planning Authority in consultation with Historic England, prior to the design of the scheme in order to inform the height of any proposed buildings, their layout and the extent of the development. This will include
 - a.** detailed assessment of the effects of the development of the site on the significance of the scheduled monument 1013660 'Motte and Bailey Castle' Deserted Village and Monastic Grange at Old Wolverton; as well as detailed consideration of the development's effects on the significance of other designated and non-designated heritage assets, if any. The agreed assessment will inform any mitigation works required to ensure that the development of the site would avoid harm to the significance of heritage assets; and
 - b.** detailed consideration of the safeguarding of the existing canal route through the site and how the layout of the country park has regard to the potential future need for new sections of canal to cross it to facilitate restoration; and
 - c.** prior to submission of an application, detailed assessment to characterise archaeological remains and identify direct impact of development proposals to inform design and a programme of archaeological mitigation which could involve preservation in situ by design or record or a combination of the two. This to be agreed with Historic England; and
 - d.** protection of the existing Anglian water drainage and water infrastructure that crosses the site; and
 - e.** detailed strategic landscape and visual impact assessments of the whole site to deliver a high quality landscaped setting within and around the boundary of the proposal; and
 - f.** appropriate financial contributions to mitigate the impact of the development on services and facilities as required by the council's policies; and g. detailed impact assessments will be required explaining how the proposals will safeguard the local wildlife site within its boundary and contribute towards biodiversity net gains.





Appendix

Additional

Relevant Policy

B

B. Additional Relevant Policy

This appendix includes Policy S1, S8, S10 & T1 extracted from the Joint Core Strategy and Policy SS2 the Part 2 Local Plan.

Policy S1: The Distribution of Development

Development and economic activity will be distributed on the following basis:

- a. Development will be concentrated primarily in and adjoining the principal urban area of Northampton;
- b. Appropriate development of a lesser scale will be located in and adjoining the sub-regional centre of Daventry town centre;
- c. The development needs of rural service centres of Towcester and Brackley and the rural areas will also be provided for;
- d. New development in the rural areas will be limited with the emphasis being on:
 1. Enhancing and maintaining the distinctive character and vitality of rural communities;
 2. Shortening journeys and facilitating access to jobs and services;
 3. Strengthening rural enterprise and linkages between settlements and their hinterlands; and
 4. Respecting the quality of tranquillity in assessing the suitability of sites for development.

Policy T1: Spatial Strategy for Towcester

The role of Towcester as a Rural Service Centre will be supported and enhanced by the following developments and other proposals:

- a. Housing development within the existing urban area and as part of the Towcester South Sustainable Urban Extension (see policy T3);
- b. Employment development as part of the regeneration of the town centre and as part of the Towcester South Sustainable Urban Extension;
- c. The regeneration of Towcester town centre, principally through the mixed use development of the Moat Lane Area (Policy T2);
- d. Additional services and facilities provided through the regeneration of the town centre and the Towcester South sustainable urban extension;
- e. Delivery of an A5 relief road and complementary sustainable transport measures to improve air quality and reduce congestion in the town centre;
- f. The provision of additional comparison (non food) shopping floorspace within the town centre and local shopping facilities within the Towcester South Sustainable Urban Extension; and
- g. Supporting the protection and improvement of the facilities provided at Towcester racecourse (Policy T5).

Policy S10 – Sustainable Development Principles

Development will:

- a. achieve the highest standards of sustainable design incorporating safety and security consideration and a strong sense of place;
- b. designed to improve environmental performance, energy efficiency and adapt to changes of use and a changing climate over its lifetime;
- c. make use of sustainably sourced materials;
- d. minimise resource demand and the generation of waste and maximise opportunities for reuse and recycling;
- e. be located where services and facilities can be easily accessed by walking, cycling or public transport;
- f. maximise use of solar gain, passive heating and cooling, natural light and ventilation using site layout and building design;
- g. maximise the generation of its energy needs from de-centralised and renewable or low carbon sources;
- h. maximise water efficiency and promote sustainable drainage;
- i. protect, conserve and enhance the natural and built environment and heritage assets and their settings;
- j. promote the creation of green infrastructure networks, enhance biodiversity and reduce the fragmentation of habitats; and
- k. minimise pollution from noise, air and run off.

Policy S8: Spatial Distribution of Jobs

Employment provision within South Northamptonshire District comprising:

- a. Renewal and regeneration of existing employment sites as set out in Policy E1;
- b. High performance technology motorsport cluster at Silverstone Circuit as set out in Policy E5;
- c. Local employment provision within sustainable urban extension policies; and
- d. Tourism and Visitor Development in the Rural Areas as set out in Policies E7 and R2.

Policy SS2: General Development and Design Principles

- 1 Planning Permission will be granted where the proposed development:
 - a. maintains the individual identity of towns and villages and their distinct parts, does not result in physical coalescence that would harm this identity and does not result in the unacceptable loss of undeveloped land, open spaces and locally important views of particular significance to the form and character of the settlement; and
 - b. uses a design-led approach to demonstrate compatibility and integrations with its surroundings and the distinctive local character of the area in terms of type, scale, massing, siting, form, design, materials and details; and
 - c. is designed to provide an accessible, safe and inclusive environment which maximises opportunities to increase personal safety and security through preventative or mitigation measures; and
 - d. incorporates suitable landscape treatment as an integral part of the planning of the development; and
 - e. incorporates sensitive lighting schemes that respects the surrounding area and reduce harmful impacts on wildlife and neighbours; and
 - f. will result in a good standard of amenity for its future occupiers in terms of privacy, sunlight, daylight, outlook, natural ventilation, noise, odour and vibration, overshadowing or result in loss of privacy, sunlight daylight or outlook, unless adequate mitigation measures are proposed and secured; and
 - g. has appropriate regard to its effect on air quality and the effects of air quality on its future occupiers; and
 - h. does not result in the loss of the best and most versatile agricultural land or valued soils; and
 - i. contributes towards the creation of a healthy community and, in the case of major development, demonstrates the health and wellbeing implications of the proposed development through a suitable health impact assessment (HIA). All major developments (10 or more dwellings or 1,000 or more square metres) will be expected to complete and submit a rapid HIA in order to determine if more substantial HIS is necessary or not, while larger developments above 100 homes will be expected to complete a more substantial HIA to support their application; and
 - j. would include a safe and suitable means of access for all people (including pedestrians, cyclists and those using vehicles) and
 - k. takes into account existing or planned social and transport infrastructure to ensure development is adequately served by public transport or is in reasonable proximity to a range of local facilities which can be reached without the need for private car journeys; and
 - l. is adequately serviced with utility infrastructure appropriate to the development including power, water supply, sewerage, waste management and telecommunications and provides for satisfactory foul and surface water drainage and incorporates mitigation identified through an assessment of flood risk and the management requirements to address current and future risks incorporating the required climate change allowance; and meets the optional higher water efficiency standard of 110 litres per person per day; and
 - m. will not adversely affect built heritage and sites of nature conservation value or sites or geological, geomorphological or archaeological importance; and
 - n. is not on or in proximity to land containing mineral resources, or if known resources exist without first considering the need to safeguard these resources; and
 - o. would not pose additional risk to users, occupiers and neighbours located in the vicinity of sites that are used for storage, or processing or transporting of hazardous substances; and
 - p. shows a detailed consideration of ecological impacts, wildlife mitigation and the creation, restoration and enhancement of wildlife corridors to preserve and enhance biodiversity; and
 - q. ensures an appropriate degree of facility provision and waste and recycling storage. Provision should be made for discrete bin storage, ideally within private rear gardens and service yards where it will not result in visual clutter which can substantially detract from the character and perceived quality of the streetscene'.
- 2 Proposals that contravene any of the above criteria (of relevance to that proposal) will be refused unless outweighed by other material considerations.
- 3 Major development proposals will also be required to:
 - a. retain, enhance or create a high quality public or semi public realm; and
 - b. enhance legibility through the spatial pattern of development and street hierarchy.
 - c. The use of design codes, masterplans or planning briefs will be considered for multi-phased developments to ensure consistency of design approach.



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CONSULTATION & ENGAGEMENT STRATEGY
South Northamptonshire Local Plan Part 2
Employment Allocations
Supplementary Planning Document
June 2022

The Consultation and Engagement Strategy sets out the arrangements for communication and consultation with the local community and all other relevant stakeholders in respect of the Proposed Employment Allocations Supplementary Planning Document.

The consultation will cover the following documents:

South Northamptonshire Local Plan Part 2 Employment Allocations Supplementary Planning Document June 2022

The strategy meets statutory requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Statement of Community Involvement for South Northamptonshire.

Timing	Actions
June – July 2022	<p>Two press releases:</p> <ul style="list-style-type: none">• one just prior to the Planning Policy Committee papers being made public, week commencing 20 June 2022 and• one on the 6 July 2022. <p>Social media communications on the Council's Twitter and Facebook.</p> <p>Frequently Asked Questions for external use to be placed on the website.</p>
7 July – 18 August 2022 (During consultation)	<p>All consultation documents to be made available at the Inspection locations (The Forum, Moat Lane, Towcester, and at Brackley, Deanshanger, Roade and Towcester libraries).</p> <p>All consultation documents to be made available for review/download with on-line response facility available on the WNC website.</p> <p>Emails or letters explaining the consultation and providing details of how to respond will be sent to specific consultation</p>

	<p>bodies¹, the general consultation bodies², prescribed bodies³ and other organisations and individuals as appropriate.</p> <p>Paper copies of consultation documents to be provided to Town and Parish Councils of areas where employment sites have been allocated.</p> <p>Paper copies of consultation documents to be made available on request.</p> <p>Drop in events will be held at the Forum in Towcester and at a venue in Cosgrove/Old Stratford Parish. These will be staffed by officers of the Council and the consultants who authored the SPD.</p>
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¹ The specific consultation bodies are listed in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and relate to organisations responsible for services and utilities and infrastructure provision.

² The general consultation bodies are also specified in Regulation 2 of the 2012 Regulations and comprise:

voluntary bodies some or all of whose activities benefit any part of the local planning authority's area bodies which represent the interests of:

- different racial, ethnic or national groups in the local authority's area
- different religious groups in the local planning authority's area
- disabled people in the local planning authority's area
- persons carrying on business in the local planning authority's area

³ The prescribed bodies are specified in Regulation 4 of the 2012 Regulations (as amended) and in the case of West Northamptonshire are:

Environment Agency, Historic England, Natural England, Civil Action Authority, Homes and Communities Agency, NHS, Office of Rail Regulation, Highways England, Northamptonshire County Council Highways, South East Midlands Local Enterprise Partnership, Northamptonshire Local Nature Partnership



WEST NORTHAMPTONSHIRE COUNCIL

PLANNING POLICY COMMITTEE

28th June 2022

Councillor Rebecca Breese

Cabinet Member for Strategic Planning, Built Environment and Rural Affairs

Report Title	Updated West Northamptonshire Local Development Scheme
Report Author	<p>Paul Everard Planning Policy & Heritage Manager paul.everard@westnorthants.gov.uk</p>

Contributors/Checkers/Approvers

West S151	Martin Henry Executive Director, Finance	Email approval obtained 19 th May 2022
Director	Stuart Timmiss Executive Director: Place, Economy & Environment	Email approval obtained 30 th May 2022
Legal	Theresa Boyd Solicitor	Email approval obtained 27 th May 2022
Communications	Becky Hutson	Email approval obtained 18 th May 2022

List of Appendices

Appendix A – Updated West Northamptonshire Local Development Scheme

1. Purpose of Report

- 1.1. To seek approval for an updated Local Development Scheme which sets out a timetable for local plan preparation.

2. Executive Summary

- 2.1 Local Planning Authorities are required to produce, and keep up to date, a Local Development Scheme (LDS) which sets out and timetables the local plans they will prepare to plan for development in their area.
- 2.2 Members may recall that the West Northamptonshire LDS was adopted in September 2021. Following the recent Spatial Options consultation in the West Northamptonshire Strategic Plan (WNSP) and the hearing sessions that took place as part of the examination in public of the Northampton Local Plan Part 2 (NLPP2), it is now necessary to amend the timetables for both documents and this needs to be reflected in the LDS.

3. Recommendations

- 3.1 It is recommended that the Committee:
 - a) Approves the updated West Northamptonshire Local Development Scheme (Appendix A) which is to be brought into effect upon the expiry of the call-in period for Planning Policy Committee decisions.
 - b) Delegates to the Assistant Director: Growth, Climate and Regeneration, in consultation with the Portfolio Holder for Planning, Built Environment and Rural Affairs, authority to make minor editorial and presentational changes to the Local Development Scheme in its final published form.

4. Reason for Recommendations (NOTE: this section is mandatory and must be completed)

- 4.1 It is a statutory requirement for the Council to produce an LDS setting out the Local Plans which, when prepared, will comprise part of the development plan for the area. The LDS must be made available to the public and kept up to date. For West Northamptonshire, a new LDS is needed to set out revised timetables for the next stages in the preparation of the West Northamptonshire Strategic Plan and final stages in the preparation of the Northampton Local Plan Part 2.

5. Report Background

- 5.1 The Local Development Scheme needs to be updated for two main reasons. Firstly, to reflect the current timetable for the WNSP, which has had to be changed because the consultation on Spatial Options was extended and there was a larger than expected number of consultation responses and additional baseline evidence has had to be commissioned. Secondly, the stages necessary to progress the NLPP2 to adoption cannot now be completed to the timetable set out in the current LDS. The Council is required to specify the date that the LDS will be brought into effect. It is suggested that this should be upon the expiry of the call-in period for Planning Policy Committee decisions.

- 5.2 The updated LDS attached at Appendix A sets out the anticipated timetable for the preparation of the WNSP and the examination and adoption stages of the NLPP2. The LDS envisages that the WNSP will be submitted for examination in December 2023 with adoption in March 2025. On the assumption that consultation on the Proposed Modifications to the NLPP2 starts on 7th July 2022 and the Planning Inspectors are able to give us their feedback on the responses to the consultation on Main Modifications by 7th October, it is anticipated that adoption of the NLPP2 will take place in December 2022.

6. Issues and Choices

- 6.1 The updated LDS presented at Appendix A sets out a reasonable timetable for the preparation of the WNSP and the completion of the remaining stages of the NLPP2 based on the resources currently available. It is a statutory requirement for the Council to publish an LDS and ensure that it is up to date. As such, failing to approve an LDS is not an option.
- 6.2 The Committee could consider options for preparing the WNSP more quickly, but this would necessitate additional resources and may also run the risk that the plan would not be thoroughly prepared and could be found unsound at examination.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 The costs of producing the updated LDS can all be met from existing resources.

7.2 Legal

- 7.2.1 Section 15 of the Planning and Compulsory Purchase Act sets out the statutory requirement for local planning authorities to publish a Local Development Scheme and ensure that it is kept up to date.

7.3 Risk

- 7.3.1 Failure to maintain an up-to-date LDS could result in the WNSP and the NLPP2 failing legal tests. It would also be criticised by the Inspectors examining the NLPP2 who have indicated that the LDS should be updated.

7.4 Consultation

- 7.4.1 There is no requirement for formal consultation on the LDS.

7.5 Consideration by Overview and Scrutiny

- 7.5.1 Not applicable.

7.6 Climate Impact

- 7.6.1 The approval of the LDS does not have any direct implications for climate change. However, both the WNSP and the NLPP2 include policies to address climate change that will contribute to the Council's ambitions in this respect.

7.7 Community Impact

- 7.7.1 The LDS provides information to the community on the timetable for the preparation of Local Plans and opportunities to be involved.

7.8 Communications

- 7.8.1 See paragraph 7.4.1 above.

8. Background Papers

None



West
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West Northamptonshire Local Development Scheme

July 2022



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1.0 WHAT IS A LOCAL DEVELOPMENT SCHEME

- 1.1 A Local Development Scheme (LDS) sets out and timetables the key planning policy documents that local planning authorities (LPAs) will prepare to plan for development in their area. Its main purpose is to ensure that local communities, businesses, developers, service and infrastructure providers and other interested organisations know when they will be able to participate. It is a requirement of the Planning and Compulsory Purchase Act 2004 (as amended by Section 111 of the Localism Act (2011)) that LPAs prepare and maintain an LDS.
- 1.2 The LDS must specify:
- The local development documents which are to be development plan documents;
 - The subject matter and geographical area to which each development plan document is to relate;
 - Which development plan documents (if any) are to be prepared jointly with one or more other local planning authorities;
 - Any matter or area in respect of which the authority have agreed (or propose to agree) to the constitution of a joint committee;
 - The timetable for the preparation and revision of the development plan documents; and
 - Such other matters as are prescribed.
- 1.3 Development plan documents must be prepared in accordance with the LDS.
- 1.4 This LDS is the second to be prepared by West Northamptonshire Council. It sets out the programme for the production of the following local plans:
- a) the West Northamptonshire Strategic Plan which it is intended will review and replace the policies that address the strategic priorities of the area in the West Northamptonshire Joint Core Strategy (adopted in December 2014); and
 - b) the Northampton Local Plan (Part 2) which will provide detailed planning policies to manage and guide development across the former borough council area.

2.0 THE DEVELOPMENT PLAN CONTEXT IN WEST NORTHAMPTONSHIRE

- 2.1 The statutory development plan is a suite of documents that set out a local authority's policies and proposals for the development and use of land in their area.
- 2.2 Development plan documents (DPDs) must be written to be in general conformity with government guidance, in particular the National Planning Policy Framework (NPPF).

Development plan documents include:

- Local plans for a council area (or for more than one council area if working together). Preparation of a local plan is a statutory requirement. A local plan may be a single document or a suite of documents with some covering specific policy matters or specific geographical areas.
 - Neighbourhood development plans can be produced by town or parish councils or other relevant bodies to set out policies (however expressed) in relation to the development and use of land in the whole or any part of a particular, specified neighbourhood area. They are not prepared by the local planning authorities but are submitted to them ahead of independent examination and referendum. Neighbourhood development plans are not legally defined as development plan documents but do become part of the statutory development plan when they are 'made' (adopted).
- 2.3 West Northamptonshire Council was established on 1st April 2021 and encompasses the former administrative areas of Daventry District, Northampton Borough and South Northamptonshire Councils. For the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004, on publication of this LDS in July 2022 the Development Plan for West Northamptonshire comprises:
- **West Northamptonshire Joint Core Strategy Local Plan (Part 1)**
– Adopted December 2014;
 - **Settlements and Countryside Local Plan (Part 2) for Daventry District 2011-2029** – Adopted February 2020;
 - **South Northamptonshire Local Plan (Part 2) 2011-2029** – Adopted July 2020
 - Saved policies of the **Northampton Local Plan** – Adopted June 1997;
 - **Northampton Central Area Action Plan** – Adopted January 2013; and
 - **Northamptonshire Minerals and Waste Local Plan** – Adopted July 2017.

- **neighbourhood development plans** which have been formally ‘made’ by West Northamptonshire Council and the predecessor authorities¹

West Northamptonshire Joint Core Strategy Local Plan (Part 1) (JCS)

- 2.5 The JCS sets out the long-term vision and objectives for the whole of the West Northamptonshire area for the plan period up to 2029, including strategic policies for steering and shaping development. The Plan includes overall targets for the provision of homes and jobs and identifies specific locations for new strategic housing and employment together with the transport and other infrastructure required to support development.
- 2.6 The JCS provided a strategic framework to guide the preparation of the Part 2 Local Plans for Daventry District, Northampton Borough and South Northamptonshire. These Plans provide more detailed planning policies and site allocations for each of the former council areas.

Settlements and Countryside Local Plan (Part 2) for Daventry District 2011-2029

- 2.7 The part 2 local plan for the Daventry area was adopted in February 2020. The Plan sets out clear local policies, standards and criteria against which all proposals for development and change of use of land and buildings in the Daventry Area will be assessed and to inform planning decisions in the period to 2029. The Plan also includes a settlement hierarchy and allocations of land to meet development needs identified in the JCS including policies, standards and criteria related to sites for gypsies, travellers and travelling showpeople.

South Northamptonshire Local Plan (Part 2) 2011-2029

- 2.8 The part 2 local plan for the South Northamptonshire area was adopted in July 2020 and includes the following key components:
- Village and town confines;
 - Designation of local green space;
 - Establishing a settlement hierarchy;
 - Provision of new and extended employment sites;
 - Historic conservation, open space, landscape and nature conservation policies and designations;
 - Day to day development management policies;
 - Urban and rural non-strategic employment allocations; and
 - Policies map

¹ Further information on Neighbourhood Plans is available via the following links: [Daventry Area](#) [Northampton Area](#) [South Northamptonshire Area](#)

Saved Policies from the 1997 Northampton Local Plan

- 2.9 A number of policies from the 1997 Northampton Local Plan were saved in 2007 to ensure that they remained part of the development plan until they could be replaced by subsequent local plans. Some of these policies were subsequently replaced by the West Northamptonshire Joint Core Strategy and the Northampton Central Area Action Plan but a number of saved policies remain. These remaining policies will be replaced by the Northampton Local Plan (Part 2) when it is adopted.

Northampton Central Area Action Plan (CAAP)

- 2.10 The CAAP was adopted in January 2013 and provides specific planning policy and guidance for Northampton town centre and adjoining areas where significant regeneration or investment is proposed in the period up to 2026. The continuing regeneration and growth of Northampton's central area, coupled with planning reforms, such as the prior notification system for changes of use from business to residential, means that it is necessary to review the CAAP's policies and proposals. The Northampton Local Plan Part 2 will include those policies which remain up to date and any CAAP policies which need updating. Once adopted, the part 2 local plan will replace the CAAP.

Northamptonshire Minerals and Waste Local Plan

- 2.11 Northamptonshire County Council was responsible for the preparation of the Minerals and Waste Plan which sets out the strategy, policy and locations for minerals and waste development. The Minerals and Waste Plan update, which concentrated on reviewing the sites and allocations in the previously adopted 2014 Local Plan, was adopted in July 2017. It provides planning policies and site allocations for minerals and waste development in the whole of Northamptonshire. Future reviews of the Minerals and Waste Plan will be the responsibility of West Northamptonshire Council and will be set out in a separate minerals and waste development scheme.

3.0 THE FUTURE DEVELOPMENT PLAN

- 3.1 This section sets out the development plan documents which will be prepared over the three-year period from July 2022 to July 2025.

Northampton Local Plan Part 2

- 3.2 This part 2 Local plan will cover the former administrative area of Northampton Borough Council including the Northampton central area and will be consistent with the JCS. The plan will cover the period up to 2029 and its main scope will be as follows:
- Site specific allocations including residential and employment uses;

- Detailed development management policies against which planning applications will be determined;
 - Identification, phasing and implementation of local infrastructure;
 - Boundaries of retail centres;
 - Historic conservation, open space and nature conservation policies and designations; and
 - Policies map
- 3.4 Preparation of the plan is well-advanced and adoption is anticipated in December 2022. The timetable for completing the remaining stages of plan preparation is set out in Section 5.

West Northamptonshire Strategic Plan

- 3.7 This plan will review and where appropriate replace the policies that address the strategic priorities for the area in the adopted West Northamptonshire Joint Core strategy Local Plan (Part 1).
- 3.8 The scope of the plan will focus on strategic matters which will, as a minimum, meet the requirements of the revised NPPF for authorities to have a plan that addresses the strategic priorities for their areas. The plan will respond to any challenges and opportunities that arise from the Oxford – Cambridge Arc. There will be a particular emphasis on place making for our communities to ensure that development and associated infrastructure is delivered through a plan led approach which ensures development of the right quality, in the right place and at the right time.
- 3.9 To address the key strategic priorities for the area the scope of the plan will comprise:
- **The spatial strategy** for the distribution of development.
 - **Climate change resilience** – as a cross cutting theme that runs through the plan's strategy and policies.
 - **Place-shaping / sustainable development** – Key principles to ensure quality development and sustainable places.
 - **Natural and built environment** - the protection and enhancement of natural/built and historic assets and achieving net biodiversity gain.
 - **The housing requirement** – the number and type of new homes to be provided across West Northamptonshire and the proportion of the overall housing requirement that should be affordable.
 - **Economic growth** – Targets for the provision of jobs and employment land in West Northamptonshire and guidance on the strategic locations for new employment land to meet the jobs requirement. New policy guidance for town centres and retail development.
 - **Strategic infrastructure** – The key primary infrastructure projects that are required to deliver the strategy such as strategic transport schemes utility networks and community facilities.

- **Health** - ensuring people can lead active lifestyles, including access to good quality open space, natural and semi natural greenspace and enjoy cleaner air.
 - **Strategic development locations and opportunities** – Key strategic sites that are crucial to the delivery of the spatial strategy will be identified in the Plan.
- 3.10 The spatial vision will be extended to align with the statutory plan period i.e. to 2041.
- ### **Stages of Plan Preparation**
- 3.11 The various stages of development plan document preparation, as prescribed by regulations, are summarised below, where progress has already been made, this is noted:
- **Commencement/ early tasks** – This stage involves gathering evidence, including the views of local communities. It also involves initial consultation on the sustainability appraisal technical report.
 - **Pre-submission (Regulation 18)** – Consultation on the issues to be addressed by the plan followed by a consultation on the options to address these issues. Engagement with stakeholders and the community will continue throughout the pre-submission stage and is expected to include a consultation on a full draft of the plan. An Issues consultation was undertaken in the autumn of 2019 and an Options consultation in Autumn 2021.
 - **Proposed Submission Consultation or Publication Stage (Regulation 19)** – This stage involves a formal consultation on the final version of the local plan, when the council will invite all interested parties to submit representations.
 - **Submission (Regulation 22)** – The council will formally submit the local plan to the Secretary of State for independent examination.
 - **Examination** – Interested parties can make representations to an independent Planning Inspector. Following the examination the Inspector will produce a report and may recommend changes.
 - **Adoption** – This is the process whereby the council will adopt the local plan as part of the statutory development plan for the area.
- 3.12 The programme for preparing the West Northamptonshire Strategic Plan is set out in the schedule in section 5 and the LDS timetable in Appendix 1 at the end of this document. The council is expected to progress the preparation of the Plan in accordance with the schedule and progress on meeting the programme will be reported annually in the authority monitoring report. If significant changes occur the LDS will be reviewed.

4.0 SUPPORTING DOCUMENTS

4.1 This section outlines the range of supporting documents which will sit alongside the proposed Northampton Local Plan Part 2 and the West Northamptonshire Strategic Plan.

Sustainability Appraisal and Habitats Regulation Assessment

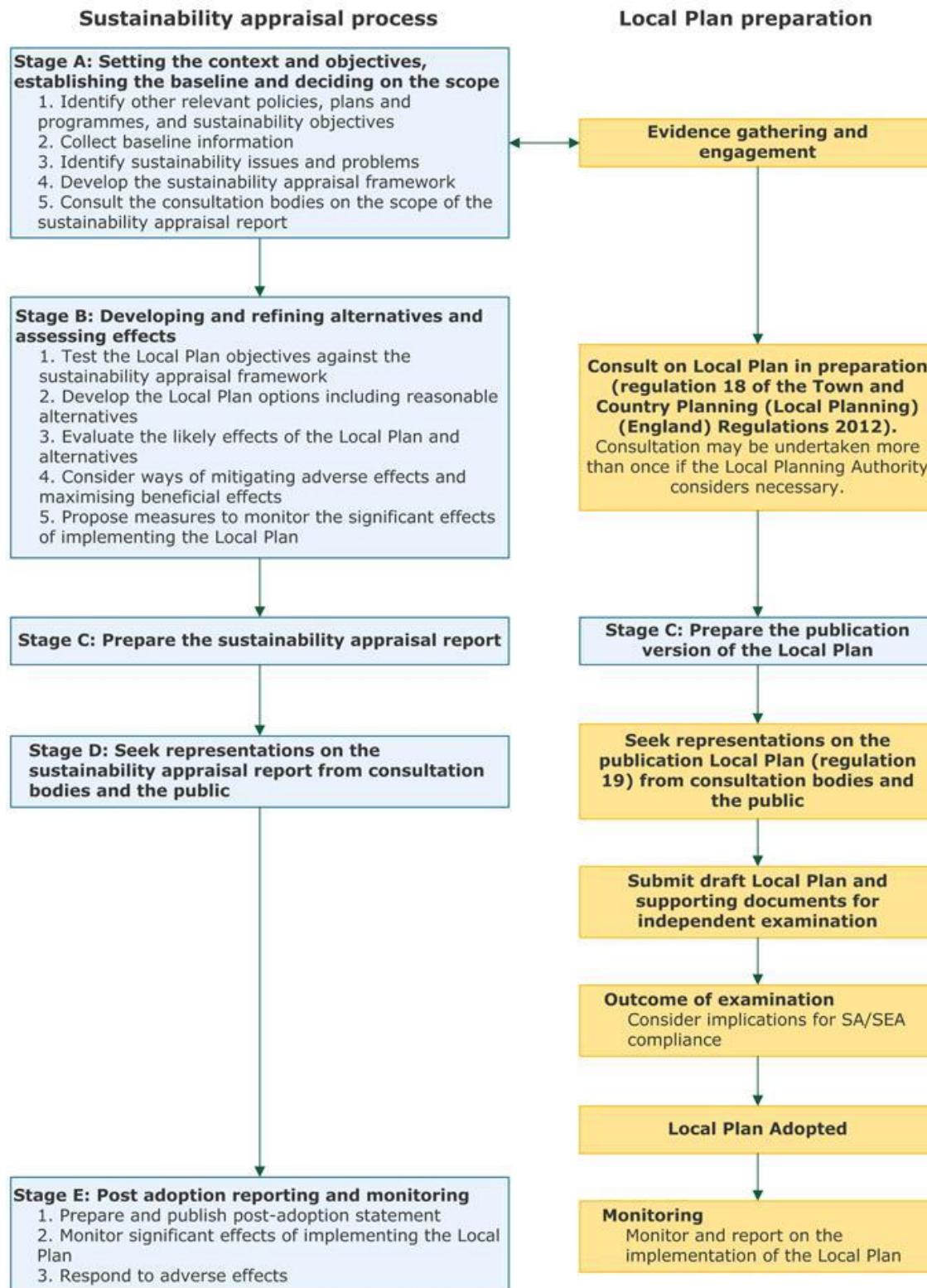
4.2 Under the Planning and Compulsory Purchase Act 2004 the sustainability appraisal of development plans is mandatory. For the development plan it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment Directive (European Directive 2001/42/EC). Therefore, it is a legal requirement for local plans to be subject to SA and SEA throughout its preparation. The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process. The aim of the process is to appraise the social, environmental and economic effects of plan strategies and policies and ensure that they accord with the objectives of sustainable development.

4.3 The SA, incorporating the SEA, is being undertaken as an integral part of preparing the Local Plan and will help arrangements for monitoring and implementation. The SA process has the following five stages:

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
- Stage B: Developing and refining alternatives and assessing effects
- Stage C: Prepare the sustainability appraisal report
- Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public
- Stage E: Post adoption reporting and monitoring

4.4 Under the Conservation of Habitats and Species Regulations 2010 (as amended) a Habitats Regulations Assessment (HRA) is required for any proposed plan or project which may have a significant effect on one or more European sites and which is not necessary for the management of those sites. The purpose of the HRA is to determine whether or not significant effects are likely and to suggest ways in which they could be avoided. The first stage is to carry out a screening process to establish if the local plan might have any likely significant effects on any European site and therefore to determine whether a full HRA would be required for the Plan. The screening will be undertaken at the same time as the issues and options stage (Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) of the plan's preparation.

4.5 Further details of how the SA and HRA processes relate to the local plan preparation stages are set out in the diagram below:



Policies Map

4.2 A comprehensive West Northamptonshire policies and proposals map will geographically express the adopted local plan policies for West

Northamptonshire as a whole. In accordance with regulation 9(1) of the regulations, a submission policies and proposals map will accompany the West Northamptonshire Strategic Plan and the Northampton Local Plan Part 2 to illustrate the geographical application of their policies. The adopted policies and proposals map will be revised as each new local plan is adopted, to ensure that it always reflects the up-to-date local plan policies for the West Northamptonshire area.

Authority Monitoring Report

- 4.3 Following its approval, the LDS will be monitored on an annual basis in the West Northamptonshire Authority Monitoring Report (AMR).

Statement of Community Involvement

- 4.4 The Statement of Community Involvement (SCI) sets out how the council will engage communities and stakeholders in the preparation of planning documents and the determination of planning applications. The predecessor councils of Daventry District, Northampton Borough and South Northamptonshire Councils have all produced SCIs.² A new SCI was produced in September 2021 specifically to deal with engagement on the strategic plan. The consultation and engagement to be undertaken in the preparation of the strategic plan will accord with this SCI.

Community Infrastructure Levy Charging Schedules

- 4.5 The Community Infrastructure Levy (CIL) is a statutory way of collecting developer contributions to help fund infrastructure projects such as transport schemes and community facilities, to support new development in the area. Under the CIL arrangements local authorities can charge a locally set rate per square metre on many types of new development. The predecessor councils worked together on the proposals for CIL across West Northamptonshire, but each borough and district council retained its individual identity as a charging and collecting authority and retained control over the spending of CIL receipts.
- 4.6 During 2015 each of the predecessor councils approved CIL charging schedules and CIL charges have been operative across the whole of the West Northamptonshire area since April 2016. West Northamptonshire Council will consider whether a review of the CIL charging schedules is necessary having regard to the evidence base produced for the strategic plan.

5.0 PROGRAMME FOR PLAN PREPARATION

² [Daventry District Council - Statement of Community Involvement](#) ; [Northampton Statement of Community Involvement](#) ; and [South Northamptonshire Council - Statement of Community Involvement](#)

- 5.1 The programme for the preparation of the Northampton Local Plan Part 2 and the West Northamptonshire Strategic Plan is set out in the schedules below.

Schedule 1 - Northampton Local Plan Part 2	
Subject Matter	To set out site specific allocations for the former Northampton borough area including residential and employment uses. It will include policies against which planning applications for the development, management and use of land and buildings will be considered. It will include the identification, phasing and implementation of local infrastructure for sites. As an example the policy content will include boundaries of retail centres, historic conservation, open space and nature conservation policies and designations, highway issues and car parking. It will replace the Central Area Action Plan and saved policies from the 1997 Local Plan.
Geographical Area	Former Northampton Borough Area
Status	Development Plan Document
Timetable for Production and Conformity with Appropriate Regulations	
Formal Commencement of Preparation/ Consultation on the Scope of the Local Plan Part 2/ Call for Sites (Regulation 18)	September – October '15
Issues Consultation (Regulation 18)	April - June '16
Options Consultation (Regulation 18)	September – November '16
Sites Consultation (Regulation 18)	October - November '17
Publication of Draft Plan and Consultation (Regulation 19)	May '19 – June '19
Round 2 Publication of Draft Plan and Consultation (Regulation 19)	July '20 - September '20
Submission (Regulation 22)	February '21
Examination (Regulation 24)	November '21
Adoption (Regulation 26)	December '22
Management Arrangements	Assistant Director: Planning and Head of Planning Policy. Regular reports to Cabinet Member for Strategic Planning, Built Environment and Rural Affairs and Assistant Cabinet Members for Planning.
Resources Required	Planning Policy team; input from other Council services, neighbouring authorities, consultees, Programme Officer and Planning Inspectorate.

Monitoring and Review Mechanisms	Authority Monitoring Report
Schedule 2 – West Northamptonshire Strategic Plan	
Subject Matter	<p>To address the key strategic priorities for the area including:</p> <ul style="list-style-type: none"> • The spatial strategy for the distribution of development. • Climate change resilience – as a cross cutting theme that runs through the plan's strategy and policies. • Place-shaping / sustainable development – Key principles to ensure quality development and sustainable places. • Natural and built environment - the protection and enhancement of natural/built and historic assets and achieving net biodiversity gain. • The housing requirement – the number and type of new homes to be provided across West Northamptonshire and the proportion of the overall housing requirement that should be affordable. • Economic growth – Targets for the provision of jobs and employment land in West Northamptonshire and guidance on the strategic locations for new employment land to meet the jobs requirement. New policy guidance for town centres and retail development. • Strategic infrastructure – The key primary infrastructure projects that are required to deliver the strategy such as strategic transport schemes utility networks and community facilities. • Health - ensuring people can lead active lifestyles, including access to good quality open space, natural and semi natural greenspace and enjoy cleaner air. • Strategic development locations and opportunities – Key strategic sites that are crucial to the delivery of the spatial strategy will be identified in the Plan.
Status	Development Plan Document (Local Plan)
Geographical Area	The whole of West Northamptonshire
Timetable for Production and Conformity with Appropriate Regulations	
Formal Commencement of Preparation/ Consultation on the Scope of the Local Plan Part 2/ Call for Sites (Regulation 18)	October 2018 – June 2019
Issues Consultation (Regulation 18)	August – October '19

Options Consultation (Regulation 18)	October – December '21
Draft Plan Consultation (Regulation 18)	December '22
Publication of Draft Plan and Consultation (Regulation 19)	June 23
Submission (Regulation 22)	December '23
Examination (Regulation 24)	July 24
Adoption (Regulation 26)	March 25
Management Arrangements	Assistant Director: Planning and Head of Planning Policy. Regular reports to Cabinet Member for Strategic Planning, Built Environment and Rural Affairs and Assistant Cabinet Members for Planning.
Resources Required	Planning Policy Team, input from other Council services, neighbouring authorities, consultees, Programme Officer and Planning Inspectorate.
Monitoring and Review Mechanisms	Authority Monitoring Report

APPENDIX 1 – LOCAL DEVELOPMENT SCHEME TIMETABLE

Timetable	2022						2023						2024						2025													
	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	
Northampton Local Plan Part 2							A																									
West Northants Strategic Plan							D					P				S				E							A					

Key:

- O – Consultation on Options (Reg 18)
- D – Consultation on Draft Plan (Reg 18)
- P- Publication of Proposed Submission Plan (Reg 19)
- S- Submission of Plan to Secretary of State (Reg 22)
- E – Commencement of Examination (Reg 24)
- A – Adoption (Reg 26)



WEST NORTHAMPTONSHIRE COUNCIL

PLANNING POLICY COMMITTEE

28 June 2022

Councillor Rebecca Breese

Cabinet Member for Strategic Planning, Built Environment and Rural Affairs

Report Title	Northampton Local Plan Part 2: Proposed Modifications consultation
Report Author	<p>Paul Everard Planning Policy and Heritage Manager paul.everard@westnorthants.gov.uk</p> <p>Noreen Banks Planning Policy Team Leader noreen.banks@westnorthants.gov.uk</p>

Contributors/Checkers/Approvers

West S151	Martin Henry Executive Director, Finance	18 May 2022
Director	Stuart Timmiss Executive Director: Place, Economy & Environment	30 May 2022
Legal	Theresa Boyd Solicitor	27 May 2022
Communications	Becky Hutson	18 May 2022

List of Appendices

Appendix A – Proposed Main Modifications

Appendix B – Proposed Additional Modifications

Appendix C – Proposed Changes to the Policies Map

Appendix D – Northampton Local Plan Part 2 (with tracked changes)

Appendix E – Sustainability Appraisal

Appendix F – Habitats Regulations Assessment

Appendix G – Viability Assessment (addendum)

Appendix H – Community and Engagement Strategy

1. Purpose of Report

- 1.1. To seek Members' approval on:
 - A. the contents of the Proposed Modifications to the Northampton Local Plan Part 2 comprising the Main Modifications, Additional Modifications and changes to the Policies Map as shown in Appendices A, B and C; and
 - B. their release for public consultation.

2. Executive Summary

- 1.2. The Northampton Local Plan Part 2 'the plan' was submitted for independent examination in February 2021. Government-appointed Inspectors conducted hearings about the Plan in November 2021. Following the hearings, proposals for the modification of the plan and the policies map have been prepared to reflect the outcome of the hearing sessions and a note produced by the Inspectors following the close of the hearings. The Proposed Main Modifications are necessary to make the plan sound and will need to be released for public consultation; any comments made on them will then be considered by the Inspectors before they issue their final report.
- 1.3. The Proposed Additional Modifications and Changes to the Policies Map have been identified by the Council. Consultation on these two documents is also considered necessary, it will be for the Council to determine how to deal with any responses.

3. Recommendations

- 3.1 It is recommended that the Committee:

- a) Approves the Proposed Main Modifications to the Northampton Local Plan Part 2 for consultation
- b) Approves the Proposed Additional Modifications to the Northampton Local Plan Part 2 for consultation
- c) Approves the Proposed Changes to the Policy Map for consultation
- d) Delegates to the Assistant Director: Growth, Climate and Regeneration, in consultation with the Portfolio Holder for Planning, Built Environment and Rural Affairs, authority to make minor editorial and presentational changes to the consultation documents in their final published form

4. Reason for Recommendations (NOTE: this section is mandatory and must be completed)

- To accord with legislation on local plan preparation and to enable the plan to proceed towards adoption.

5. Report Background

INTRODUCTION

- 5.1 In January 2021, Northampton Borough Council approved the submission of the plan for independent examination by the Planning Inspectorate. The plan contains policies which will be used to determine planning applications. It also includes site allocations, showing where sites for housing and employment developments are considered acceptable. The plan seeks to supplement and where necessary refine and supersede the strategic policies contained in the adopted West Northamptonshire Joint Core Strategy Local Plan Part 1, which was adopted in December 2014. This includes the requirement to deliver around 18,870 dwellings and contribute towards the creation of 28,500 new jobs over the plan period.
- 5.2 The plan was submitted to the Secretary of State for independent examination in February 2021. In March, the Council was informed that two Planning Inspectors had been appointed to conduct the examination into the plan. Part of the examination process includes the hearings, which were conducted in November 2021. During the hearings, the Inspectors sought information and clarification on a number of policies from representatives from the Council as well as participants comprising landowners, developers, consultants and statutory organisations such as the Environment Agency.
- 5.3 Following the conclusion of the hearings, the Inspectors, in their letter dated 24 January 2022, concluded that the plan could be found legally compliant and sound subject to consultation on Main Modifications to the plan as well as the resolution of some matters highlighted during the hearings. In their post hearings letter, they outlined where modifications to the plan would be necessary to make the plan sound which is a key requirement of the National Planning Policy Framework. These recommendations have been taken on board by Officers and developed into Proposed Modifications. Appendix D is the modified plan, which contains tracked changes of these modifications.

OVERVIEW

- 5.4 The Proposed Modifications are in three parts. The first is the Proposed Main Modifications (Appendix A) which contains proposed changes to policies as well as the formulation of new policies. For example, there were some policies which have been amended to reflect the recommendations set out by statutory consultees including those associated with the natural environment. Some changes were made following the discussions held at the hearing, where it was concluded that the policies could be set out more clearly. For example, the policies associated with housing developments and employment were rewritten in a manner which would make them clearer by splitting them into their individual topic areas. There were other policies which were recommended for removal including the policies on hot food takeaways; and gypsies, travellers and travelling showpeople. In addition, the Planning Inspectors recommended further discussions with key stakeholders which resulted in changes to and the formulation of additional site-specific allocations policies for Hunsbury Hill and the former Abington Mill Farm.

- 5.5 The Proposed Main Modifications also include updates on site allocations. Following further assessments on the status of the sites allocated for development, it was concluded that some of these sites were no longer required or considered suitable for allocations.
- 5.6 The second part of the Proposed Modifications is the Additional Modifications (Appendix B). These are modifications to the plan to correct spelling errors and make minor changes to presentation. They do not affect the way the plan would be used. The Inspectors have advised that these should also go out to public consultation separately, but at the same time as, the Main Modifications.
- 5.7 The third part of the Proposed Modifications is the Proposed Changes to the Policies Map (Appendix C). There are changes to the map, some as a consequence of Main Modifications and some corrections and also changes to the key. The Inspectors have advised that these should also go out to public consultation separately, but at the same time as, the Main Modifications.

MAIN MODIFICATIONS

- 5.8 The key main modifications are as summarised as follows:

Chapter 5: Quality of New Development

- 5.9 This chapter focuses on matters associated with place making and the principles of high-quality design. Policy 2 (Placemaking) and Policy 3 (Design) have been merged to make the Plan simpler to read and follow. Policy 4 has been modified to take out the requirement for housing developments to meet the Nationally Described Space Standards, because the Inspectors were of the view that this was not justified. Policy 6 (Health and wellbeing) has been revised to provide more details on rapid health impact assessments. Policy 7 (Flood risk and water management) has been strengthened to require all development proposals to demonstrate that they will assist in the management of flood risk, ensure flood risk is not increased elsewhere and provide flood risk reduction or betterment.

Chapter 6: Northampton Regeneration Strategy

- 5.10 This chapter outlines the policy direction for the town centre and the Central Area. Policy 12 (Development of Main Town Centre Uses) has been updated to remove reference to the Central Area because evidence shows that the role of the town centre is changing, and more emphasis should be given to promoting main town centre uses in the town centre rather than the wider Central Area. Accordingly, the Central Area is not considered suitable for the application of this policy.

Chapter 7: Housing

- 5.11 This chapter provides details on housing allocations and housing policy. There were modifications made to Policy 13 (residential and residential led allocations) following the Planning Inspectors' recommendation to review the provision of amenity open spaces in terms of the impacts of their losses on the overall quantity within the affected areas, as well as factual updates on the status of the sites. Some of the sites have been removed from allocation because

they were on areas of amenity green space or allotments that could not readily be replaced or because they have gained planning permission and are being built out. The preamble to this policy has been significantly updated and altered such that housing supply is now monitored against the trajectory in the Joint Core Strategy. Policy 14 (Type and Mix of housing) has been modified to provide clarity on the implementation of self-build and custom build housing. Policy 16 (Gypsies, travellers and travelling showpeople) has been deleted following the Inspectors' advice, with this matter being addressed through the West Northamptonshire Strategic Plan.

Chapter 8: Economy

- 5.12 This chapter deals with matters associated with the area's economy and employment. Following recommendations from the Inspectors to clarify the policies, a new Policy 17A (Employment Allocations) has been formulated listing sites allocated for employment use.

Chapter 9: Hierarchy of centres, retail and community services

- 5.13 Policy 19 (new retail developments and retail impact assessment) has been modified to clarify the additional amounts of convenience and comparison retail floorspace provision that will be supported in the retail hierarchy to 2029. Policy 20 (hot food takeaways) has been deleted because the Inspectors considered the restriction requiring hot food takeaways to be located more than 400m from school entrances was not justified by the evidence.

Chapter 10: Built and natural environment

- 5.14 The policies in this chapter provide guidelines on applications which affect the natural and built environment, from open spaces to heritage assets. Policy 28 (Providing open spaces) is proposed to be updated to include reference to SANG (Suitable alternative natural greenspace) which are existing areas of open land improved to attract residents of new developments away from designated sites such as Special Protection Areas and Special Areas of Conservation. Policy 29 (supporting and enhancing biodiversity) has been split into two separate policies (Policies 29A and 29B), to address biodiversity and nature conservation more comprehensively. Policy 29B (Nature Conservation) ensures that development will not adversely affect Special Protection Areas (SPAs), Ramsar sites and Sites of Special Scientific Interest. Policy 30 (Upper Nene Valley Gravel Pits Special Protection Area) has been amended to ensure that developments likely to have significant effects of the Upper Nene Valley Gravel Pits SPA satisfy the requirements of the Habitats Regulations.

Chapter 11: Movement

- 5.15 Policy 34 (Transport schemes and mitigation) has been strengthened through the addition of guidelines on addressing air quality issues. It has also been altered to make reference to the former railway routes linking Northampton with Market Harborough and Northampton station with Brackmills being investigated for future transport use in a local plan review. The Inspectors' view was that there was not sufficient robust evidence to justify safeguarding the route of the former Northampton – Market Harborough railway line in this plan.

Chapter 13: Site specific allocations and policies

- 5.16 This chapter deals development allocations and provide details on how specific sites will be developed. The Planning Inspectors recommended that Policy 38 (development allocations) be reviewed so there is clarity between the types of allocations proposed. For this reason, the policy has been deleted, Policy 13 continues to focus on housing development and a new Policy 17A has been drafted listing sites allocated for employment uses. Policy 41 (The Green, Great Houghton) has been updated to reflect the contents of the signed Statement of Common Ground between the Council, Homes England and Natural England. These included changes to the extent of the land covered by the policy. Policy 43 (Ransome Road) has been updated to reflect the correct number of dwellings which will be delivered on the site. A new site- specific policy for site 1100 (land at Hill Farm Rise, Hunsbury Hill) has also been formulated (new Policy 45).

ADDITIONAL MODIFICATIONS

- 5.17 The Proposed Additional Modifications set out at Appendix B, are relatively minor and few in number.

PROPOSED CHANGES TO THE POLICIES MAP

- 5.18 The Proposed Changes to the Policies Map set out at Appendix C. The Inspectors have recommended that this list of Proposed Changes should be accompanied by an updated version of the Policies Map incorporating all of those proposed changes.

OTHER DOCUMENTS PROPOSED TO BE MADE AVAILABLE DURING PUBLIC CONSULTATION

- 5.19 The proposed modifications to the Plan were also subject to a Sustainability Appraisal (Appendix E), and a Habitats Regulations Assessment (Appendix F), as part of the legal plan preparation process requirements. Both assessments conclude that the modifications were acceptable and the majority did not result in any change to the conclusions reached concerning the submitted version of the plan. These documents will also be consulted upon as part of this consultation. The proposed modifications were also subject to an updated Viability Assessment (Appendix G) which concluded that the policies in the plan remain viable. This document will be made available as background information to the consultation.

NEXT STEPS

- 5.20 If approved, it is envisaged that the Proposed Modifications will be released for public consultation. There will be a six week consultation period. At this stage of the plan preparation process, only comments relating to the proposed modifications will be accepted. A consultation and engagement strategy, which conforms to legal requirements as well as Northampton's Statement of Community Involvement, has been prepared to set out the detail of the consultation process (Appendix H).

6. Issues and Choices

- 6.1 Option 1: Agree the recommendations The plan has been prepared to provide guidance on the implementation of strategic policies contained in the West Northamptonshire Joint Core Strategy, adopted in December 2014 and contains more detailed policies which will be used in the determination of planning applications. Part 2 plans have already been adopted for the Daventry and South Northamptonshire areas.
- 6.2 The Main Modifications have been prepared for public consultation at the request of the Planning Inspectors, in order for the plan to be considered sound. The Inspectors have also advised that Additional Modifications and Proposed Changes to the Policies Map be prepared for public consultation alongside the Main Modifications. If Members agree to release the proposed modifications for public consultation, then the plan will be on track towards adoption. The timetabling of this process will need to be in conformity with the West Northamptonshire Local Development Scheme, an updated version of which is set out elsewhere on this agenda. When the consultation on the proposed modifications concludes, the Planning Inspectors will prepare their report and recommendations for the adoption of the plan. This phase is expected to take between 4 to 6 months. Once the plan is adopted it will become part of the development plan for the Northampton area. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 6.3 Option 2: Not agree with the Proposed Modifications and their release for public consultation
- 6.4 The plan in its current state, needs to be modified in order for it to be made sound. If Members choose not to approve the modifications for public consultation, then the plan cannot proceed to adoption. In determining planning applications for the Northampton area, the planning authority would have to continue to rely on policies which are likely to become out of date or national guidance which is generic and not locally specific.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 The Council's costs in respect of consulting on the Proposed Modifications to the plan will be met from existing budgets associated with the plan preparation process.

7.2 Legal

- 7.2.1 The independent examination part of the local plan preparation process is set out in Part 24 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Once the consultation on the Proposed Modifications is completed, and relevant comments are taken into account, provided there are no outstanding planning matters to consider for further consultation, the Planning Inspectors will prepare a report. Subject to the outcome of the report, the Council would then be in a position to adopt the plan.

7.3 Risk

- 7.3.1 There are no significant risks arising from the proposed recommendations in this report.

7.4 Consultation

- 7.4.1 The plan preparation process was undertaken in compliance with the regulations set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 and consultation forms a key element of the process. There are several stages that the plan has been through, namely the Issues stage (spring 2016), the Options stage (autumn 2016) and Proposed Submission stage (summer 2019 and summer 2020). During each of these stages, local organisations and members of the public were consulted. Consultation was also undertaken both with colleagues within the authority (including Development Management and Environmental Health), external stakeholders (such as the Environment Agency, Natural England, Historic England and Anglian Water) landowners (such as Network Rail) and developers. The consultation was also undertaken in conformity to Northampton's Statement of Community Involvement.

7.5 Consideration by Overview and Scrutiny

- 7.5.1 Not applicable.

7.6 Climate Impact

- 7.6.1 Policies in the plan, including those relating to flooding, sustainable construction and the provision for electric vehicle charging points, will have a beneficial impact on climate change.

7.7 Community Impact

- 7.7.1 The plan will ensure that developments are directed to the right locations and that they are constructed in a manner that meets the required standards. It will ensure that a balance is secured between the built and natural environment, therefore continuing to supply houses and employment for existing and future residents whilst enhancing the quality and quantity of open spaces and protecting the area's heritage assets. All these will have a positive impact on the community.

7.8 Communications

- 7.8.1 Communications plays a key role throughout the local plan preparation process, particularly in publicising and encouraging participation in the consultation stages. The council will continue to keep the public and all other stakeholders informed and engaged in this consultation using its corporate communications channels including media releases, social media and targeted marketing activity.

8. Background Papers

- 8.1 [Northampton Local Plan Part 2 Submission & Examination | Northampton Local Plan Part 2 Submission & Examination | West Northamptonshire Council - Northampton Area](#)
- 8.2 [EXAM 40 Inspectors Post Hearings Letter 24012022 | West Northamptonshire Council - Northampton Area](#)

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WEST NORTHAMPTONSHIRE COUNCIL

**NORTHAMPTON LOCAL PLAN PART 2
SUBMISSION PLAN**

**PROPOSED SCHEDULE OF MAIN MODIFICATIONS
JUNE 2022**

Reference	Policy/Paragraph	Suggested Modification to Policy Wording	Reason for modification
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>	
Note 1		In the final version of the plan, every paragraph in a policy which has more than one paragraph will be given a letter, and each bullet pointed criterion will be given a roman numeral. As these changes are presentational only, they do not formally form part of these modifications.	N/A
		Chapter 1: Introduction and Policy Context	
MM1	New paragraph following paragraph 1.5	The Development plan should be read as a whole, including this Local Plan Part 2, the West Northamptonshire Joint Core Strategy, "made" Neighbourhood Plans and any documents that subsequently become part of the development plan. Planning applications will be determined having regard to the development plan and other material considerations.	To ensure that the Plan is sound by being clear about its status.
		Chapter 5: Quality of New Development	
MM2	Paras 5.1, 5.5 and 5.7 and Policies 2 and 3	<p>Paragraph 5.1, add the following after 6th sentence: <u>These facilities should be designed in a manner which will be easily accessible by the local population by walking and cycling or by using public transport.</u></p> <p>Amend paragraph 5.5 to read as follows: <u>All development should be well designed and of high quality, meeting urban design principles outlined in the Design Companion for Planning and Placemaking¹⁵, and Active Design, the National Design Guide¹⁶ and the National Model Design Code.</u> The Council also believes that meeting Building for a Healthy Life criteria helps achieve urban design principles. Building for a Healthy Life (BfHL) is a national standard for well-designed homes and neighbourhoods. <u>There are 12 considerations or criteria which need to be taken into account in the areas of design and placemaking. The 12 considerations include elements such as natural connections, well defined streets and spaces, and green infrastructure.</u> To be eligible for a Building for a Healthy Life commendation, a development needs to secure at least 9 green lights out of the 12 considerations (and no red lights). The Council supports the use of this guidance to help structure pre-application discussions with applicants. BfL, or a successor standard as well as other relevant guidance, including the Design Companion for Planning and Placemaking, National Design Guide and Active Design to help structure pre-application discussions between local communities, the Council and the developer of the proposed scheme.</p> <p><u>Amend Policy 2 Combine Policies 2 and 3 into a single policy,</u> to read as follows:</p> <p>POLICY 2 PLACEMAKING AND DESIGN</p> <p>A. Development should be designed to promote and contribute to good placemaking through high quality, innovative <u>beautiful</u> and sustainable design which encourages the creation of a strong, locally distinctive sense of place by:</p> <ul style="list-style-type: none"> i. Being well designed for the intended use(s), attractive and adaptable to future requirements <u>throughout its life</u>. ii. Incorporating a mix of easily accessible facilities for day to day living <u>and that enables</u> enabling community interaction and cohesion, or <u>by</u> providing easy <u>and inclusive</u> access to those facilities nearby 	<p>To explain how 2nd bullet point of Policy 2 can be delivered.</p> <p>To reflect the updated National Planning Policy Framework (July 2021).</p> <p>To reflect the publication of revised and retitled guidance.</p> <p>Consequential change to policy.</p>

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		<ul style="list-style-type: none"> iii. Creating healthy environments that prioritise people walking and cycling to reach local facilities and facilitate recreation iv. Responding to and enhancing locally distinct townscape, landscape and historic environment characteristics v. Retaining, enhancing and creating important views and vistas into, out of and through the site responding to topography and landform where such opportunities arise vi. Sustaining, protecting and enhancing heritage and natural environment assets, including non-designated assets and settings and those included on Local Lists as well as those already statutorily protected. Additionally, future development must not leave these assets vulnerable to risk and, wherever possible, should promote the use, understanding and enjoyment of the historic and natural environments as an integral part of good placemaking vii. Having regard to safeguarding or enhancing the setting of locally distinct places, including those found in Conservation Area Appraisals, in terms of scale, design, landform and integration within the existing local context to protect their identified important and unique characteristics based on sound, consistent analysis viii Including <u>attractive, safe and inclusive</u> high quality public realm for streets and public spaces incorporating features such as public art as an opportunity to reinforce and enhance legibility, character and local distinctiveness ix. Incorporating mixed-use buildings, taking amenity into account x. Ensuring plans for long-term maintenance are in place <p>Add the following wording after the final bullet point:</p> <p><u>B.</u> To assist in the achievement of good placemaking, new developments should be designed to:</p> <p>Incorporate sustainable design at the beginning of the development process</p> <p>Ensure safety, security, amenity, accessibility and adaptability</p> <ul style="list-style-type: none"> i. Have full regard to the needs for security and crime prevention, with crime prevention measures incorporated into the site layout and building design ii. Ensure residents' privacy and adequate levels of sunlight and daylight Be as sustainable as possible and constructed in a sustainable fashion iii. Incorporate Design Coding (in the case of major developments) to ensure consistency of design approach iv. Ensure that buildings are designed to be resilient in the future taking into account the impacts of climate change v. Ensure that buildings' form, massing and façades create character and visual interest vi. Use high quality and durable materials vii. Include windows and active frontages overlooking the public realm viii. Use passive design principles where appropriate 	This point is adequately covered in Policy 5 This point is adequately covered elsewhere in the policy

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		<p>ix. 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> <p>x. Incorporate green roofs and living walls into the building design where possible</p> <p><u>xi. Ensure that public, open or green spaces are overlooked by houses to ensure that they are safe spaces; and Achieve Building for Life certification</u></p> <p><u>xii. Ensure that new streets are tree lined unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate.</u></p> <p>Opportunities for the provision of street trees and soft landscaping should be taken and subject to the other criteria of this policy.</p> <p><u>C. For proposals for major development, a Building for a Healthy Life assessment, or an assessment against equivalent criteria, should be included in the Design and Access Statement to demonstrate that the proposal is capable of achieving a Building for a Healthy Life commendation, or an equivalent standard.</u></p> <p><u>D. Small scale developments (for 10 dwellings or fewer) 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 <u>and take the available opportunities to enhance their surroundings.</u></u></p> <p>5.7 To complement the placemaking policy, it is necessary to have detailed design criteria as set out in policy 3.</p> <p><u>Delete Policy 3</u></p> <p><u>POLICY 3</u></p> <p><u>DESIGN</u></p> <p>To assist in the achievement of good placemaking, new developments should be designed to:</p> <ul style="list-style-type: none"> • Incorporate sustainable design at the beginning of the development process • Ensure safety, security, amenity, accessibility and adaptability • Have full regard to the needs for security and crime prevention, with crime prevention measures incorporated into the site layout and building design • Ensure residents' privacy and adequate levels of sunlight and daylight • Be as sustainable as possible and constructed in a sustainable fashion • Incorporate Design Coding (in the case of major developments) to ensure consistency of design approach • Ensure that buildings are designed to be resilient in the future taking into account the impacts of climate change 	<p>This is not considered to add any additional value to the policy.</p> <p>To update the policy to refer to Building for a Healthy Life</p> <p>To ensure conformity with government guidance</p> <p>To update the policy to refer to Building for a Healthy Life</p>

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		<ul style="list-style-type: none"> • Ensure that buildings' form, massing and façades create character and visual interest • Use high quality and durable materials • Include windows and active frontages overlooking the public realm • Use passive design principles where appropriate • 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 • Incorporate green roofs and living walls into the building design where possible • Ensure that public, open or green spaces are overlooked by houses to ensure that they are safe spaces; and • Achieve the Building for Healthy Life certification <p>Opportunities for the provision of street trees and soft landscaping should be taken and subject to the other criteria of this policy.</p> <p>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>	Paragraph 5.7 is superfluous with the modifications. To policies 2 and 3.
MM3	Paragraph 5.9 and Policy 4	Delete Paragraph 5.9: When converting a property into a house in multiple occupation, the landlord/ property owner must provide acceptable standards, for example, for room sizes, lighting and internal layout. In addition, internal space standards within new dwellings play an important part in ensuring that the resident's quality of life and wellbeing are appropriately considered. Space standards are intended to ensure that new dwellings provide a reasonable level of internal space to undertake day to day activities at a given level of occupancy. The Nationally Described Space Standard (NDSS) deals with internal space within new dwellings and is suitable for application across all tenures. 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. Policy 4, delete 5 th bullet point: <ul style="list-style-type: none"> • Provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards, or successor guidance Policy 4, amend 7 th bullet point: <ul style="list-style-type: none"> • That large<ins>all</ins> developments.... 	<u>To accord with tests of soundness set out in the National Planning Policy Framework.</u> <u>To accord with tests of soundness set out in the National Planning Policy Framework.</u> <u>To clarify that all developments need to incorporate high-quality public realm</u>
MM4	Paragraph 5.17 and Policy 5	<u>Paragraph 5.17, amend as follows:</u> It is increasingly recognised that one of the most important factors in delivering a successful development scheme is ensuring that sustainability is integrated into the design from the outset. This tends to lead to better design and lower lifetime cost, as options are greater at an early stage and there is more scope to identify options that achieve multiple aims. For this reason, Policy 5 requires that, for all major	To provide a mechanism by which it can be demonstrated that proposals for new

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		<p>developments, a Sustainability Statement is included as part of the Design and Access Statement for submission with the planning application. <u>A Sustainability Statement may also include Embodied Carbon Construction Calculations and whole-life costing in design and procurement processes.</u> Sustainable design and construction takes into account the resources used in construction, the environmental, social and economic impacts of the construction process and how buildings are designed and used.</p>	<p>buildings and the refurbishment of existing building stock have adopted sustainable construction methods.</p>
MM5	Paragraphs 5.28, 5.29 and Policy 6	<p>Paragraph 5.28, amend as follows:</p> <p>Planning 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: The design of new developments can have an impact on the community's health and wellbeing, through the shaping of the local environment and influencing the lives of the existing and future residents. It is therefore important to ensure that major development proposals include assessments on the impacts of the schemes on the health and wellbeing of the community. One way in which this can be achieved is through a health impact assessment on major development proposals. The applicant should demonstrate how the scheme promotes the provisions outlined below, and how these would benefit existing and future residents in terms of the impacts on their health and wellbeing. Good design can do this through:</p> <p>Paragraph 5.29, amend as follows:</p> <p>Health impact assessments enable the identification and assessment of the likely effects that a proposed development will have on the health and wellbeing of the community. By using this, positive health and wellbeing impacts can be maximised and negative health and wellbeing impacts can be avoided and minimised. In order that Health Impact Assessments are proportionate to the scale of a scheme, and hence its potential impacts, Wwith its partners, the Council has developed a Rapid Health Impact Assessment tool for assessing the likely health impacts of development proposals to be used as they are being developed of up to 100 dwellings. It has been designed in such a way as to help meet the objectives of local strategies and plans to improve health and wellbeing including the Northamptonshire Joint Health and Wellbeing Strategy. Development proposals for 100 or more dwellings will be expected to include a more substantial health impact assessment to support their application. Applicants for major development schemes of up to 100 dwellings are strongly encouraged to use this tool to support their proposals and demonstrate compliance with policy 6. Applicants for developments over 100 dwellings will need to complete a full Health Impact Assessment.</p> <p>Policy 6, amend 1st paragraph:</p> <p>The health and wellbeing of communities will be maintained and improved by requiring <u>major development to demonstrate, through an appropriate health impact assessment, that it will contribute to creating an age friendly, healthy and equitable living environment through:</u></p> <p>5th bullet point, amend:</p> <p>v. 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 standards set out in Policy 28 of this Plan; and</p> <p>Add new 6th bullet point:</p> <p>vi. <u>Use of design tools such as Building for a Healthy Life (BfHL)</u></p> <p>Second paragraph, amend as follows:</p> <p>The Council will support the provision of health facilities to accommodate primary and secondary needs in sustainable accessible locations which contribute towards health and wellbeing.</p>	<p>To clarify that HIAs are needed for all major development.</p> <p>To clarify that criterion 5 relates to policy 28.</p> <p>To strengthen the position in relation to the Building for a Healthy Life guidelines</p> <p>To aid clarity.</p>

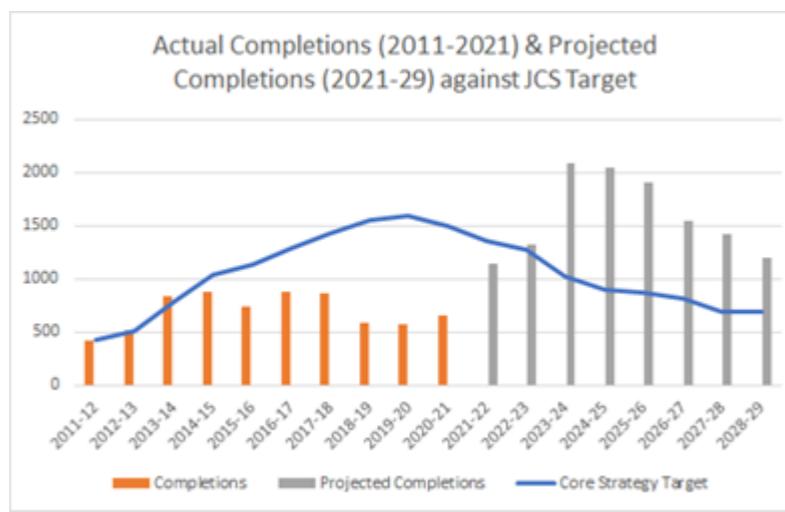
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		Third paragraph, delete: All residential developments of 10 or more dwellings, or 1,000 or more square metres will be required to be supported by a rapid health impact assessment in order to determine if a more substantial health impact assessment is necessary. Larger developments, of 100 dwellings or more, will be expected to complete a more substantial health impact assessment to support their application.	This paragraph is superfluous.
MM6	Paragraphs 5.31 to 5.34 and Policy 7	<p>Amend paragraph 5.32 as follows:</p> <p>It is not possible to eliminate all the risk of flooding. The Northamptonshire Local Flood Risk Management Strategy produced by the LLFA, sets out a framework of measures to manage local flood risk. The strategy sets out a collaborative approach to reducing flood risk within Northamptonshire. In addition, within the Upper Nene Catchment for surface water drainage, there is a need to incorporate a 1 in 200 year standard with an additional allowance for climate change to protect against pluvial flooding. The design standard for the Upper Nene Catchment (through Northampton and within the Nene catchment upstream of Northampton) is the 0.5% probability (1 in 200 chance of occurring in any given year) event plus climate change. Surface water attenuation should be provided up to this standard.</p> <p>Amend paragraph 5.34 to read as follows:</p> <p>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. Anglian Water's SUDs Adoption handbook and the water sector Design and Construction Guidance sets out the circumstances in which SUDs features would be adopted by Anglian Water.</p> <p>Add new paragraph between paragraph 5.34 and Policy 7 to read as follows:</p> <p><u>5.35 SUDS should be multi-use rather than set aside solely for the purpose of water storage. Building for a Healthy Life states that well designed multi-functional sustainable drainage may incorporate play and recreational opportunities.</u></p> <p>Amend Policy 7 as follows:</p> <p>Proposals that:</p> <ul style="list-style-type: none"> • assist in the management of flood risk and ensure flood risk is not increased elsewhere and provide flood risk reduction/ betterment; and • 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 documents) <p>will be supported.</p> <p><u>All proposals must demonstrate that they will assist in the management of flood risk, ensure flood risk is not increased elsewhere and provide flood risk reduction/ betterment. Proposals must have regard to relevant guidance for flood risk management and standards for surface water produced by the Lead Local Flood Authority and Anglian Water (or successor documents).</u></p>	To reflect consultation responses made by Anglian Water and to reflect comments made by the Environment Agency in their Written Statement. To strengthen the policy and to emphasise that this must be complied with. The replacement wording emphasises that this is policy requirement rather than being optional, which is important to ensure that water and flooding matters are addressed.

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		<p>Delete 'major' from last paragraph: For all major development: Add the following paragraph at the end: <u>C. Surface water attenuation should be provided to the design standard for the Upper Nene Catchment (through Northampton and within the Nene catchment upstream of Northampton) i.e. a 0.5% probability (1 in 200 chance of occurring in any given year) event plus climate change.</u></p>	Policy should be applicable to all development and not just major development.
		Chapter 6: Northampton Regeneration Strategy	
MM7	Policy 9	<p>2nd bullet point: ii. Four Waterside – <u>any proposals should conform to Policy 44 of this plan</u></p> <p>3rd bullet point: iii. St Peters Way – to the south of the roundabout - <u>any proposals should conform to Policy 44 of this plan.</u></p>	To provide clarity
MM8	Policy 11	<p>Replace 2nd paragraph as follows: <u>Hotel proposals in other parts of the plan area will be the subject of the sequential test.</u> <u>Developments for hotels in any other locations which apply the sequential test and demonstrate that the scheme will attract new leisure and business tourism demand without substantially undermining the potential for new hotels to be delivered in the town centre and in the Enterprise Zone will also be supported.</u></p>	To ensure consistency with the National Planning Policy Framework (July 2021).
MM9	Policy 12	<p>Amend 1st sentence as follows: ..town centre, and the Central Area.</p>	To conform to the National Planning Policy Framework.
MM10	New para 6.28 and Policy 12	<p>Add new paragraph 6.28: <u>Policy N2 of the West Northamptonshire Joint Core Strategy focuses on the Northampton town centre boundary, the Primary Shopping Area and the Central Area (CA). It states that major office, leisure and cultural development will take place in the CA and retail will be accommodated in the town centre primarily through the redevelopment of the Grosvenor Centre and town centre sites, followed by other sites in the CA. It also makes provision in the CA for a net increase of a minimum of 37,000 sq.m net of comparison shopping to 2026; around 3,000 sq.m of convenience shopping to 2026; and office development around 100,000 sq.m. This policy has now been superseded by Policies 12 and Policy 19 of this Local Plan because:</u></p> <ul style="list-style-type: none"> <u>Policy 12 supports main town centre uses in the town centre. Evidence shows that the role of the town centre is changing and more emphasis should be given to promoting main town centre uses within the town centre boundary. The reference to the Central Area therefore is no longer relevant for main town centre uses</u> <u>Policy 19 (Chapter 9) supports the provision of about 8,900sq.m net of convenience retail floorspace, and about 7,300 sq.m of comparison floorspace by 2029. The revised provision is based on updated technical evidence base.</u> <p>Delivering WNJCS: Policy N2 (Northampton Central Area)</p>	To provide an explanation as to how Policies 12 and 19 supersede Policy N2 of the West Northamptonshire Joint Core Strategy.

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		Chapter 7: Residential		
MM11	Policy 13	<p>Amend paragraphs 7.1 to 7.11, Graph 1, Table 6, Table 7 and Graph 2 to read as follows:</p> <p>7.1 The West Northamptonshire Joint Core Strategy (JCS) established an objectively assessed need of 25,758 dwellings for Northampton between 2011 and 2029. <u>JCS</u> Policy S3 sets the housing requirement for Northampton Borough from 2011 to 2029 at about 18,870 dwellings. 7073 of these dwellings (37%) are set to be provided in the Sustainable Urban Extensions (SUEs) allocated in the JCS. By 1st April 2019–2021, <u>5,727</u> <u>6,957</u> dwellings had been delivered, against a JCS requirement to allocate sufficient sites (allowing for windfall) to accommodate <u>8,157</u> <u>11,236</u> new dwellings in Northampton by that time. The number of dwellings delivered by 1st April 2019–2021 falls some <u>2,430</u> <u>4,279</u> units short of the delivery trajectory^[1] set out in the JCS (see Table 6).</p> <p>7.2 The profile of the JCS delivery trajectory was heavily influenced by economic conditions and intelligence at the time it was being progressed. The trajectory envisaged that between 2014/15 and 2023/24, an annual completion rate of over 1,000 dwellings (peaking at 1,588 in 2019/20) was deliverable. This has not materialised. This is mainly because delivery of new dwellings at the SUEs has been relatively slow. Therefore, it is now expected that not all of the dwellings to be delivered by the SUEs, will be completed before 1st April 2029. <u>Table 6 below shows the housing commitments for the SUEs.</u> Graph 1 illustrates this persistent under-delivery against the JCS proposed housing delivery trajectory. <u>Table 6 below shows the housing commitments for the SUEs. The JCS assumed that all of the SUEs would be fully built out by 1st April 2029, but Table 6 shows that around 2,624 dwellings will are likely to be delivered after that date.</u></p>	This change is proposed to make the Plan effective, and updates the data on the delivery of housing and the housing trajectory for the plan period	

Graph 1:

Housing delivery in Northampton against the Joint Core Strategy proposed housing delivery trajectory



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		<p>7.3 Northampton's Five Year Housing Land Supply Assessment for April 2019 shows that Northampton has under-delivered against the JCS target over the last five years.^[1] It was anticipated that, to accord with the NPPF, a buffer of 20% would have needed to be added to the supply of deliverable sites. However, in 2018, the Ministry of Housing, Communities and Local Government introduced a new methodology for measuring housing delivery.^[2] The first two Housing Delivery Tests concluded that Northampton Borough passed and therefore only needed a 5% buffer for the first 5 years.^[3] An assessment of Northampton's five year housing land supply also confirmed that windfall sites of under 200 dwellings have the capacity to generate in the region of 300 dwellings per annum. This is a figure that has consistently been delivered over the last 10 years. It is anticipated that this trend will continue, and potentially increase, in the short to medium term due to Government changes to permitted development rights (which include flexibility for changes of use from employment and other commercial uses to residential).</p>																						
		<p>Table 6_7: Housing commitments (including Joint Core Strategy allocations), proposed allocations and windfall</p> <table border="1"> <thead> <tr> <th></th> <th>JCS requirement 2011-<u>2019</u><u>2021</u></th> <th>Net completions 2011-<u>19</u><u>2021</u></th> <th>Delivery of dwellings compared to JCS requirement</th> </tr> </thead> <tbody> <tr> <td>Total dwellings</td> <td><u>8157</u><u>11,236</u></td> <td><u>5,727</u><u>6,957</u></td> <td>-2430 - 4,279</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Site name</th> <th>Status as at 1st April <u>2019</u><u>2021</u></th> <th>Dwellings completed as at 1st April <u>2019</u><u>2021</u></th> <th>Remaining capacity to 1st April 2029</th> <th>Remaining capacity forecast to be delivered after 1st April 2029</th> </tr> </thead> <tbody> <tr> <td>N5 (Northampton South SUE</td> <td>Under construction. N/2013/1035 (outline permission) and</td> <td>0</td> <td><u>6361,000</u></td> <td>3640</td> </tr> </tbody> </table>						JCS requirement 2011- <u>2019</u> <u>2021</u>	Net completions 2011- <u>19</u> <u>2021</u>	Delivery of dwellings compared to JCS requirement	Total dwellings	<u>8157</u> <u>11,236</u>	<u>5,727</u> <u>6,957</u>	-2430 - 4,279	Site name	Status as at 1 st April <u>2019</u> <u>2021</u>	Dwellings completed as at 1 st April <u>2019</u> <u>2021</u>	Remaining capacity to 1 st April 2029	Remaining capacity forecast to be delivered after 1 st April 2029	N5 (Northampton South SUE	Under construction. N/2013/1035 (outline permission) and	0	<u>6361,000</u>	3640
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			<u>N/2017/15</u> <u>66.</u> Reserved matters for phase 1 – 349 dwellings approved				
		N6 (Northampt on South of Brackmills)	Under construction. N/2013/03 38, <u>N/2017/13</u> <u>69 and</u> <u>N/2019/00</u> <u>48</u>	0	1115911	<u>0204</u>	
		N7 (Northampt on Kings Heath SUE – Dallington Grange)	Not implement ed. N/2014/19 29 (live application)	0	<u>2000950</u>	10002,050	
		N9 (Northampt on Upton Park SUE)	<u>N/2011/09</u> <u>97 (outline approval for up to 1,000 dwellings)</u> <u>N/2018/04</u> <u>26 (reserved matters in progress</u>	04	861856	0	

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			for 860 dwellings)					
		N9A (Northampton Upton Lodge SUE)	N/2017/0091 (live application for 1,400 dwellings) <u>N/2018/0074</u>	033	13471,11 5	53370		
		Completions	Existing commitments (as of 1st April 2019)	Win dfall allo wan ee	Sustainable Urb an Ext ensions	LP2 Allocations	Total Delivery	Plan Target
		5728	4377	2,400	5959	3,804	22,267	18,873
		Difference between Plan Target and Total Delivery						
		3,394						
		Source			Net additional dwellings			

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		<table border="1" data-bbox="628 399 1337 833"> <tr> <td data-bbox="628 399 1105 451"><u>Completions</u></td><td data-bbox="1105 399 1337 451">6,957</td></tr> <tr> <td data-bbox="628 451 1105 541"><u>Existing commitments as at 1st April 2021</u></td><td data-bbox="1105 451 1337 541">1,889</td></tr> <tr> <td data-bbox="628 541 1105 592"><u>Windfall allowance</u></td><td data-bbox="1105 541 1337 592">1,800</td></tr> <tr> <td data-bbox="628 592 1105 644"><u>Sustainable Urban Extensions</u></td><td data-bbox="1105 592 1337 644">4,832</td></tr> <tr> <td data-bbox="628 644 1105 696"><u>Allocations</u></td><td data-bbox="1105 644 1337 696">3,838</td></tr> <tr> <td data-bbox="628 696 1105 788"><u>Total</u></td><td data-bbox="1105 696 1337 788">19,316</td></tr> </table> <p data-bbox="558 893 2448 1096">In formulating this local plan, the Council has undertaken a robust Land Availability Assessment. This detailed investigation concluded that the Council had sufficient supply to meet the requirement of about 18,870 net additional dwellings across the plan period to 2029, without over reliance on delivery of housing at the SUE's and therefore complies with Policy S3 of the adopted Joint Core Strategy. In addition, despite the results of the Housing Delivery Test and the changes to Northampton's position on housing delivery, across the five years of the Local Plan (2019/20—2023/24), there is still a predicted immediate shortfall.</p> <p data-bbox="558 1185 1137 1224">7.5 The following needs to be considered:</p> <ul data-bbox="628 1313 2353 1590" style="list-style-type: none"> <li data-bbox="628 1313 2353 1388">Much of the identified under delivery so far has been the result of slower rates of housing completions in the Sustainable Urban Extensions than anticipated <li data-bbox="628 1410 2353 1484">The short term housing supply is constrained by the JCS's heavy reliance on large SUEs for substantially meeting the Borough's housing needs <li data-bbox="628 1507 2353 1590">The Council has researched alternative sites in the borough exhaustively through its Call for Sites and Land Availability Assessments. There are no other sources of supply that could address this short term shortfall <p data-bbox="558 1619 2448 1731">7.6 In the face of long term under delivery, which the Council has tried to overcome, it is unreasonable to envisage that historic under delivery against the JCS's proposed housing delivery trajectory can be addressed in the first five years of the Local Plan Part 2, particularly at a time when that same proposed delivery trajectory set out in the JCS sets unprecedented levels of housing delivery.</p> <p data-bbox="558 1760 2448 1834">7.7 The Council has therefore considered it necessary to have a housing trajectory that differs significantly from the proposed housing trajectory set out in the JCS.</p> <p data-bbox="558 1861 2448 1978">7.8 The housing assessment for Northampton Borough concluded that there is sufficient capacity to deliver 22,267 dwellings over the period 2011 to 2029 (this figure includes all planning approvals and commitments, a proportion of homes through the Sustainable Urban Extensions, windfalls and the housing capacity identified through the proposed Local Plan Part 2 developments). The Joint Core Strategy only requires the</p>	<u>Completions</u>	6,957	<u>Existing commitments as at 1st April 2021</u>	1,889	<u>Windfall allowance</u>	1,800	<u>Sustainable Urban Extensions</u>	4,832	<u>Allocations</u>	3,838	<u>Total</u>	19,316	
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		<p>delivery of 18,873 dwellings over this same period. This means that sufficient capacity has been identified to deliver 3,394 dwellings more than is required by 2029. Further information can be found in the Housing Technical Paper (Northampton Borough Council, May 2020).</p> <p>7.9 Taking into account the fact that delivery rates have proven to be low since 2011, particularly in Sustainable Urban Extensions, this surplus of 3,394 dwellings has been deducted from the requirement for 2019–2024 and a flat rate delivery rate of 1,030 dwellings per year has been applied to those years. This is a conservative approach which allows some contingency in case the SUEs continue to under-deliver, but it is also challenging given that it exceeds previous years' rates of delivery since 2011.</p> <p>7.10 From 2024/25 onwards, the annual requirement will step up to 1,609 dwellings per year. Clearly, the higher delivery level envisaged for the last five years of the Plan period is ambitious, but this matter can be addressed in the West Northamptonshire Strategic Plan, which is timetabled to have reached adoption in 2022. This will enable an early review of the Northampton Local Plan Part 2 to take place. This revised housing delivery trajectory is set out in Table 7 and Graph 2.</p> <p style="text-align: center;">Table 7: Local Plan Part 2 Housing Delivery Trajectory</p> <table border="1" data-bbox="543 1111 1349 2043"> <thead> <tr> <th data-bbox="543 1111 670 1538">Year</th><th data-bbox="670 1111 924 1538">Trajectory (including 5% buffer for 2019–2024), dwellings</th><th data-bbox="924 1111 1178 1538">Baseline Target, dwellings</th><th data-bbox="1178 1111 1349 1538">Proposed Housing Trajectory from West Northamptonshire Joint Core Strategy, 2014, dwellings</th></tr> </thead> <tbody> <tr> <td data-bbox="543 1538 670 1605">2011–12</td><td data-bbox="670 1538 924 1605">423</td><td data-bbox="924 1538 1178 1605">423</td><td data-bbox="1178 1538 1349 1605">423</td></tr> <tr> <td data-bbox="543 1605 670 1718">2012–13</td><td data-bbox="670 1605 924 1718">516</td><td data-bbox="924 1605 1178 1718">516</td><td data-bbox="1178 1605 1349 1718">516</td></tr> <tr> <td data-bbox="543 1718 670 1830">2013–14</td><td data-bbox="670 1718 924 1830">834</td><td data-bbox="924 1718 1178 1830">834</td><td data-bbox="1178 1718 1349 1830">785</td></tr> <tr> <td data-bbox="543 1830 670 1942">2014–15</td><td data-bbox="670 1830 924 1942">877</td><td data-bbox="924 1830 1178 1942">877</td><td data-bbox="1178 1830 1349 1942">1,039</td></tr> <tr> <td data-bbox="543 1942 670 2043">2015–16</td><td data-bbox="670 1942 924 2043">739</td><td data-bbox="924 1942 1178 2043">739</td><td data-bbox="1178 1942 1349 2043">1,132</td></tr> </tbody> </table>	Year	Trajectory (including 5% buffer for 2019–2024), dwellings	Baseline Target, dwellings	Proposed Housing Trajectory from West Northamptonshire Joint Core Strategy, 2014, dwellings	2011–12	423	423	423	2012–13	516	516	516	2013–14	834	834	785	2014–15	877	877	1,039	2015–16	739	739	1,132	
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Reference	Policy/ Paragraph	Suggested Modification to Policy Wording				Reason for modification
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		New wording is <u>underlined</u>				
		2016- 17	884	884	1,292	Deletions and capacity changes as a result of flooding technical work. Changes to capacity and build rates established through statements of common ground with developers and promoters and planning applications.
		2017- 18	865	865	1,426	
		2018- 19	673	673	1,544	
		2019- 20	1,030	981	1,588	
		2020- 21	1,030	981	1,491	
		2021- 22	1,030	981	1,355	
		2022- 23	1,030	981	1,278	
		2023- 24	1,030	981	1,025	
		2024- 25	1,609	1,658	900	
		2025- 26	1,609	1,658	875	
		2026- 27	1,609	1,658	815	
		2027- 28	1,609	1,658	695	
		2028- 29	1,609	1,658	694	
		Total	18,873	18,873	18,873	

Graph 2: Northampton Local Plan housing delivery trajectory

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification
		 <p>11 Northampton Housing Technical Paper (Northampton Borough Council, March 2019) 21 Housing Delivery Test measurement rulebook (MHCLG, July 2018) 31 Northampton Housing Technical Paper (Northampton Borough Council, March 2019) 41 West Northamptonshire Joint Core Strategy (adopted 2014)</p> <p>Revise policy as set out in Appendix 1</p>	
MM12	Para 7.15, 7.20 and Policy 14	<p>Paragraph 7.15, amend as follows:</p> <p>In accordance with Government guidance, the Council keeps a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in Northampton for those individuals to occupy as their sole or main residence. The register of self-build and custom build projects also provides the Council with evidence when making provision for services plots of land. As at 30th October 2021, there were 39 entries on the register of self-build and custom build projects, giving an indication of the level of demand for which the Council needs to ensure provision. On the basis that the market has not made provision for self-build or custom build housing to address this identified demand, the Council requires that 3% of plots on development sites of more than 100 dwellings be provided as serviced plots for self-build and custom build dwellings, as set out in Policy 14.</p> <p>Policy 14, amend the wording in the 'Self-build and Custom Build Housing' section:</p> <p>On sites of more than 100 dwellings, 3% of the total number of plots should be provided as serviced plots for self and custom build provision should be made for a proportion of serviced plots to contribute towards meeting the evidenced demand.....</p> <p>Plots which have remained vacant for 3 years 12 months after the installation of roads and utilities, sufficient to make them serviced plots, can be developed for other forms of housing provision if marketing evidence following a marketing strategy agreed by the local planning authority demonstrates that there have been no expressions of interest for the plots for the purposes of self-build and custom build housing.</p>	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is underlined	Reason for modification
		<p>Paragraph 7.20, amend as follows:</p> <p>Accordingly, a significant proportion of new dwellings will need to be <u>built to Building Regulations Part M accessible and adaptable dwellings to Category 2 and 3 standards in Building Regulations</u>. <u>The Northampton Specialist Housing SPD (or its successor document) provides further detail on the figures contained in Table 9 in terms of provision of Category 2 and 3 dwellings and should be referred to at the outset when considering specialist housing within schemes.</u> Further work needs to be carried out to establish the proportion of category 2 dwellings that would be most appropriate. The Housing Market Evidence also recommends that a minimum of 4% of all market housing and 8% of all affordable housing be built to M4(3) of the Building Regulations. However, Planning Practice Guidance sets out that the requirement for wheelchair accessible homes (Category M4(3) (2) (b) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. <u>wheelchair user dwelling standard (Category 3 of the Building regulations) and 8% of all affordable housing.</u></p> <p>Policy 14, amend the wording within the Specialist and Accessible Housing section of to read:</p> <p><u>4% of all new market dwellings should be constructed to Building Regulations M4(3) (2) (a) and 8% of affordable dwellings where the Council is responsible for allocating or nominating occupants should be constructed to Building Regulations Part M4 (3) (2) (b)(Wheelchair user dwellings) standards, or their successor, to enable wheelchair adaptability and accessibility.</u></p> <p><u>Applicants will need to provide evidence when site constraints prohibit the ability to deliver the required amount of specialist housing. Constraints include sites that are vulnerable to flooding, site topography, instances where the provision of a lift to dwelling entrances is unachievable, and other circumstances which may make a site less suitable for M4(2) and/or M4(3) housing, and where viability considerations would not allow for this provision.</u></p>	Amend para 7.20 to provide clarity on the evidence underpinning specialist housing requirements and when category M4(3) (2) (b) can be delivered. Amend Policy 14 to provide clarity on M4(3) dwelling requirements and provide detail on when sites may not be suitable for delivery of M4(2) and M4(3) housing.
MM13	Paras 7.26 and 7.27 and Policy 16	<p>Delete Policy 16 and supporting text:</p> <p>C. GYPSIES AND TRAVELLERS</p> <p>7.26 The West Northamptonshire Travellers Accommodation Needs Study[1] concluded that Northampton did not need to cater for additional pitches in the Local Plan for households that meet the planning definition of Gypsies and Travellers[2]. There are also no requirements to provide plots for travelling showpeople. However, temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations attended by Gypsies and Travellers. The Study concluded that a charge may be levied as determined by the Council although they only need to provide basic facilities including cold water supply, portaloos, sewage disposal point and refuse disposal facilities, to include cleansing of the site when vacated.</p> <p>7.27 This Travellers Accommodation Needs Study updates the requirements set out in Policy H6 of the West Northamptonshire Joint Core Strategy, so there is a need to replace this policy in this Plan, as set out in Policy 16. Policy 16 sets out development management criteria for any future provision that is required as result of any future evidence about requirements for Gypsy and Traveller provision.</p> <p>POLICY 16 GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE</p>	Matter to be addressed through review of the West Northamptonshire Joint Core Strategy.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is underlined	Reason for modification
		<p>Provision will be made for the accommodation of Gypsies, Travellers and Travelling Showpeople in the period 2016 to 2029 to meet the needs identified in the most recent Gypsy, Traveller and Travelling Showpeople needs assessment.</p> <p>Applications for planning permission must meet the following criteria:</p> <ul style="list-style-type: none"> a) The site has safe and convenient vehicular access from the public highway, and provides adequate space for parking, turning and servicing on site. b) The site is reasonably accessible to a range of services set out in national policy, i.e. shops, public transport, primary health care and schools. c) The site will provide an acceptable standard of amenity for the proposed residents. Sites which are exposed to high levels of flood risk and noise and air pollution are not acceptable. d) The site will be capable of providing adequate on-site services for water supply, power, drainage, sewage disposal, waste disposal, composting and recycling facilities. e) The scale and location of the site will not have an unacceptable impact on the landscape, local infrastructure and existing communities. f) In the case of sites for travelling showpeople there will be sufficient space for the storage and maintenance of equipment and the parking and manoeuvring of all vehicles associated with the occupiers. Additional screening may be required having regard to the nature of the equipment that is being stored. <p>Replaces Policy H6 of the Joint Core Strategy</p> <p>[1] West Northamptonshire Travellers Accommodation Needs Study (Opinion Research Services, January 2017) [2] Planning Policy for Travellers Sites (Department for Communities and Local Government, August 2015)</p>	
		Chapter 8: Economy	
MM14	Paragraph 8.14 and Policy 17	<p>Add to end of 8.14:</p> <p><u>Before the loss of any safeguarded employment site into another use, applicants will be expected to demonstrate that the site has been marketed for a relevant employment use for at least 12 months with no suitable interest being generated. The marketing should be undertaken in accordance with a strategy which ensures that the property is actively marketed to all those likely to be interested in it. Evidence could be provided in terms of advertisements placed in professional journals as well as online. There could also be advertisements placed on the sites/ properties themselves to ascertain local interests in employment uses.</u></p> <p>Policy 17, 2nd bullet point, amend 2nd sentence: Evidence to be supplied includes details of <u>active</u> marketing undertaken over a <u>continuous</u> period of 6—12 months which shows that the site has been actively and extensively marketed for employment use and that no suitable interest has been expressed.</p>	To remove ambiguity from the policy

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		<p>These, together with significant job opportunities that will be generated in the Daventry area (including the Daventry International Railfreight Terminal 3 which is expected to create around 7,500 jobs and allocations in the Part 2 plan), South Northamptonshire area (including employment allocations in the Part 2 plan) and Sustainable Urban Extensions, all demonstrate that the West Northamptonshire area is on track to deliver the overall target of 28,500 jobs by 2029.</p> <p>New paragraph following 8.17. <u>To support the local economy and to help new job creation opportunities, sites are allocated in this plan for employment led uses. These sites are identified on the policies map.</u></p> <p><u>New Policy 17A:</u></p> <p>POLICY 17A EMPLOYMENT ALLOCATIONS</p> <p>The following sites are allocated for employment use. Other policies of particular relevance in this plan (non-exhaustive) are indicated</p> <table border="1" data-bbox="574 990 1495 2043"> <thead> <tr> <th data-bbox="574 990 670 1170">Reference</th><th data-bbox="670 990 828 1170">Address</th><th data-bbox="828 990 924 1170">Area (Ha)</th><th data-bbox="924 990 1178 1170">No. of Jobs (indicative)</th><th data-bbox="1178 990 1495 1170">Relevant Policies (Non-exhaustive)</th></tr> </thead> <tbody> <tr> <td data-bbox="574 1170 670 1275">LAA0167</td><td data-bbox="670 1170 828 1275">Tanner Street</td><td data-bbox="828 1170 924 1275">0.38</td><td data-bbox="924 1170 1178 1275">500*</td><td data-bbox="1178 1170 1495 1275">Policy 44 Policy 7 Policy 31</td></tr> <tr> <td data-bbox="574 1275 670 1381">LAA0594</td><td data-bbox="670 1275 828 1381">Sixfields East</td><td data-bbox="828 1275 924 1381">10.18</td><td data-bbox="924 1275 1178 1381">871</td><td data-bbox="1178 1275 1495 1381">Policy 29a and 29b</td></tr> <tr> <td data-bbox="574 1381 670 1464">LAA0598</td><td data-bbox="670 1381 828 1464">Car Park, Victoria Street</td><td data-bbox="828 1381 924 1464">0.63</td><td data-bbox="924 1381 1178 1464">286</td><td data-bbox="1178 1381 1495 1464">Policy 31</td></tr> <tr> <td data-bbox="574 1464 670 1547">LAA0615</td><td data-bbox="670 1464 828 1547">Crow Lane</td><td data-bbox="828 1464 924 1547">2.92</td><td data-bbox="924 1464 1178 1547">94</td><td data-bbox="1178 1464 1495 1547">Policy 7</td></tr> <tr> <td data-bbox="574 1547 670 1653">LAA0818</td><td data-bbox="670 1547 828 1653">St Peters Way</td><td data-bbox="828 1547 924 1653"></td><td data-bbox="924 1547 1178 1653">*</td><td data-bbox="1178 1547 1495 1653">Policy 7 Policy 31 Policy 44</td></tr> <tr> <td data-bbox="574 1653 670 1758">LAA0870</td><td data-bbox="670 1653 828 1758">Sixfields, Upton Way</td><td data-bbox="828 1653 924 1758">2.17</td><td data-bbox="924 1653 1178 1758">170</td><td data-bbox="1178 1653 1495 1758">Policy 7</td></tr> <tr> <td data-bbox="574 1758 670 1864">LAA0931</td><td data-bbox="670 1758 828 1864">Sites in Green Street</td><td data-bbox="828 1758 924 1864">0.5</td><td data-bbox="924 1758 1178 1864">*</td><td data-bbox="1178 1758 1495 1864">Policy 44 Policy 31</td></tr> <tr> <td data-bbox="574 1864 670 1969">LAA1005</td><td data-bbox="670 1864 828 1969">North of Martins Yard</td><td data-bbox="828 1864 924 1969">1.4</td><td data-bbox="924 1864 1178 1969">194</td><td data-bbox="1178 1864 1495 1969">Policy 40 Policy 29a and 29b</td></tr> <tr> <td data-bbox="574 1969 670 2043">LAA1101</td><td data-bbox="670 1969 828 2043">Land at Waterside Way</td><td data-bbox="828 1969 924 2043">0.98</td><td data-bbox="924 1969 1178 2043">445</td><td data-bbox="1178 1969 1495 2043">Policy 29a and 29b Policy 30</td></tr> </tbody> </table>	Reference	Address	Area (Ha)	No. of Jobs (indicative)	Relevant Policies (Non-exhaustive)	LAA0167	Tanner Street	0.38	500*	Policy 44 Policy 7 Policy 31	LAA0594	Sixfields East	10.18	871	Policy 29a and 29b	LAA0598	Car Park, Victoria Street	0.63	286	Policy 31	LAA0615	Crow Lane	2.92	94	Policy 7	LAA0818	St Peters Way		*	Policy 7 Policy 31 Policy 44	LAA0870	Sixfields, Upton Way	2.17	170	Policy 7	LAA0931	Sites in Green Street	0.5	*	Policy 44 Policy 31	LAA1005	North of Martins Yard	1.4	194	Policy 40 Policy 29a and 29b	LAA1101	Land at Waterside Way	0.98	445	Policy 29a and 29b Policy 30	LAA0615 Crow Lane has been added to the list of sites previously included in Policy 38. It was omitted in error from Policy 38 but was shown on the Policies Map. LAA0328 Cattle Market Road was included in error and should be identified on the policies map as safeguarded – this is identified in the list of Policies Map modifications.
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LAA1112	Milton Ham	9.88	494	Policy 7 Policy 29a and 29b				
MM16	Policy 18	Policy 18, amend 1 st criterion: i. The site has been comprehensively assessed <u>as being suitable for employment, and is consistent with other relevant policies in this plan and other development plan documents</u> , and the proposed uses and associated employment activities can be carried out without causing harm to adjoining land uses and occupiers, including residential amenity. <u>The Council supports windfall employment development proposals provided the site has been comprehensively assessed as being suitable for employment purposes. These assessments should include a statement detailing the nature of the proposal, the number of jobs expected to be created, the potential impacts on the uses and occupiers of the surrounding area, and environmental (such as noise and pollution) and traffic considerations. The potential impacts on the surrounding areas should also cover matters such as impacts on the natural environment and heritage and non-heritage assets.</u>	To provide clarity on how employment applications outside designated sites will be assessed.					
		Chapter 9: Hierarchy of Centres, Retail and Community Services						
MM17	New paragraph after Table 11 Policy 19	Insert new paragraph below Table 11 to read: <u>The retail provision figures set out in Policy 19 for convenience floorspace and comparison floorspace reflect the maximum figures to 2029 set out in Table 11 above.</u> Policy 19, amend 1 st paragraph to read: A. The Council will support the provision of <u>between 7,000 sq.m and about 8,900 sq.m net of convenience retail floorspace and between 5,300 sq.m and about 7,300 sq.m net of comparison floorspace</u> to meet forecast retail expenditure to 2029 in the defined retail hierarchy as set out in the table below. 3 rd bullet point: delete (i) and revise so it reads as follows: <u>Within the defined Primary Shopping Areas, development proposals should provide an active frontage and be open for business during the day.</u> Last bullet point: Remove reference to "upper floor" <u>.....town centre uses or upper floor residential use.....</u>	To provide clarity about the retail floorspace provision figures in Policy 19 and how they have been derived. To reflect the new use class order which came into force on the 1 st September 2020.					

Reference	Policy/Paragraph	Suggested Modification to Policy Wording	Reason for modification
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>	
		Last bullet point, remove reference to "to 18 " so the policy reads: '.....vacancy and marketing for 12 to 18 months	To clarify that this part of the policy should allow residential uses at all levels and not just on the upper floors To remove ambiguity in the policy.
MM18	Paras 9.12 to 9.15 and Policy 20	<p>Delete text and policy relating to hot food takeaways:</p> <p>e. Hot food takeaways</p> <p>9.12 Nationally, it is estimated that obesity is responsible for more than 30,000 deaths each year. Public Health England anticipates that in the future, obesity could overtake tobacco smoking as the biggest cause of preventable death. Obese people are:</p> <ul style="list-style-type: none"> • At risk of certain cancers including colon cancer • More than 2.5 times more likely to develop high blood pressure (risk factor for heart disease) • 5 times more likely to develop type 2 diabetes <p>9.13 A Public Health Northamptonshire report referred to the following as being linked to the rise in obesity:</p> <p>We are living in an obesogenic environment where less than healthier choices are the default, which encourages excess weight gain and obesity</p> <p>While achieving and maintaining calorie balance is a consequence of individual decisions about diet and activity, our environment, and particularly the availability of calorie rich food, now makes it harder for individuals to maintain healthier lifestyles</p> <p>The increasing consumption of out of home meals, that are often cheap and readily available at all times of the day, has been identified as an important factor contributing to rising levels of obesity.</p> <p>9.14 the report states that in Northampton, 68.1% of the adult population over 16 are overweight or obese (compared to 62% in England), with children showing levels of 22.7% (4-5 years old) rising to 36.4% (10-11 years old). Analysis of national data shows that there is a statistical correlation between the density of fast food outlets and the prevalence of obesity. Northampton has the 3rd highest density in the country, at 86.9% per 100,000 population. It is therefore important for the Local Plan to address these challenges associated with health and wellbeing, and its relationship with poor diet and accessibility to facilities that contribute to this.</p> <p>9.15 According to Public Health England, takeaway foods tend to contain high levels of fat, saturated fat, sugar and salt, and lower levels of micronutrients. Some takeaway food can represent a low cost option to the consumer, which may enhance its appeal, including to children. Evidence shows that regular consumption of takeaway food over time has been linked to weight gain. Government guidelines support actions (like exclusion zones) to limit the proliferation of certain unhealthy uses within specified areas such as proximity to schools. Exclusion zone buffer sizes are usually set at 400m which is considered to be a reasonable 5 minute walk.</p> <p>Policy 20 HOT FOOD TAKEAWAYS</p> <p>The health and wellbeing of Northampton communities will be maintained and improved by managing the locations of, and access to, unhealthy eating facilities.</p>	Evidence not sufficient to justify policy.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification
		<p>Wording to be deleted is struckthrough</p> <p>New wording is underlined</p>	
		Proposals for new hot food takeaways (Class A5) which are situated within close proximity to a primary or a secondary school will only be permitted if the takeaway facility is located at least 400m from any entrance to the school	
MM19	Policy 21	<p>Delete: In suitable locations, proposals that seek to deliver residential accommodation on upper floors in the town centre, district centres and local centres will be supported, subject to all other material considerations.</p> <p>and replace with the following: <u>Residential development within the town centre will be specifically supported where this is above ground floor and has access which does not require people to pass through a business use.</u></p>	To clarify the policy.
MM20	Policy 23	<p>Revise 1st paragraph as follows:</p> <p>A. Sports facilities and playing pitches, as defined in the justification text, should be safeguarded from development unless:</p> <p>a) i. An assessment has been undertaken which has clearly shown the open space, buildings or land to be that the facility is surplus to requirements; or</p> <p>b) ii. The loss resulting from the proposed development would be replaced by an equivalent or better provision in terms of quantity and quality in a suitable location; or</p> <p>c) iii. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use</p> <p>C. <u>Proposals for Major developments are expected to have regard to contribute towards providing facilities in line with the recommendations provided in....</u></p>	To comply with the NPPF.
MM21	Policy 24	<p>Replace 1st and 2nd paragraphs:</p> <p>A. <u>Proposals for new community facilities, alterations or extensions to existing facilities and change of use to such facilities, will be viewed favourably where they:</u></p> <p>i. are located where the property/ site is accessible by public transport and other sustainable transport modes including walking and cycling</p> <p>ii. contribute positively to the well-being and social cohesion of local communities, and</p> <p>iii. do not result in any significant adverse impact on the residential amenity of the area including impacts associated with noise and traffic</p> <p>Development of new, or alterations to existing, community facilities will be viewed favourably where they are in a sustainable location and contribute positively to the well-being and social cohesion of local communities.</p> <p>Proposals for new or extended community, and for change of use to such facilities, including places of worship, will be considered against the following:</p> <ul style="list-style-type: none"> • The property/ site should be accessible by public transport and other sustainable transport modes including walking and cycling • Any proposal should no result in any significant, adverse impact on the residential amenity of the area including impacts associated with noise and traffic 	To remove duplication that appears in the 1 st and 2 nd paragraphs.
MM22	Policy 25	1 st bullet point: Remove the word "sustainable" and the comma so the policy reads:locate premises within sustainable locations, with good.....	To remove ambiguity within the policy.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification												
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>													
MM23	Policy 26	<p>Amend 1st sentence:on the Policies Map will be <u>are</u> allocated.....</p> <p>Last sentence amended to read: ...extended cemeteries should be sensitive to ensure there is no harm to <u>result in a net gain in</u> biodiversity.</p>	<p>To correct a typographical error.</p> <p>To ensure consistency with the National Planning Policy Framework.</p>												
		Chapter 10: Built and Natural Environment													
MM24	Policy 27	<p>Amend 2nd paragraph as follows: All <u>major housing and commercial</u> developments of 15 dwellings or more will be expected to deliver and/or contribute to.....'</p> <p>Add 'and blue' to 1st and 2nd paras as follows:</p> <p>1st paragraph: New developments must ensure that existing green <u>and blue</u> infrastructure assets will be protected.....</p> <p>2nd paragraph:will be expected to deliver and/or contribute to the green <u>and blue</u> infrastructure projects. Applications must be accompanied by a site-specific green <u>and blue</u> infrastructure strategy and /or plan to illustrate how green and blue infrastructure is integrated within the development proposal and how it seeks to improve connectivity to the Local Level Green Infrastructure network beyond the site boundary.</p>	<p>To ensure consistency with the NPPF's (Annex 2) definition of Major.</p> <p>To ensure the policy is effective with regards to blue as well as green infrastructure.</p>												
MM25	Policy 28	<p>Include new paragraph under 10.11</p> <p><u>Suitable Alternative Natural Greenspaces (SANGS)</u> are existing areas of open land which are improved to attract residents of new developments away from designated sites such as Special Protection Areas and Special Areas of Conservation. SANGS need to be suitably designed for recreation, accessible and usually provide circular footpaths. As set out in Policy 28, the provision of a SANG may meet or contribute to the provision of other types of open space.</p> <p>Amend table within Policy 28:</p> <table border="1"> <thead> <tr> <th>Open space type</th><th colspan="3">Planning standards for new development</th></tr> </thead> <tbody> <tr> <td></td><td>Quantity per 1,000 population</td><td>Maximum distance of provision from all parts of proposed development</td><td>Reference quality standard to be applied <u>Quality</u></td></tr> <tr> <td></td><td></td><td></td><td></td></tr> </tbody> </table>	Open space type	Planning standards for new development				Quantity per 1,000 population	Maximum distance of provision from all parts of proposed development	Reference quality standard to be applied <u>Quality</u>					<p>To provide a definition of SANGs and detail how they can meet other open space requirements.</p> <p>Addition of the word 'walk' to reflect the recommended walking thresholds set out in the OSSR.</p> <p>Addition of footnotes to direct the applicant to quality standards that should be used.</p>
Open space type	Planning standards for new development														
	Quantity per 1,000 population	Maximum distance of provision from all parts of proposed development	Reference quality standard to be applied <u>Quality</u>												

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>				Reason for modification	
		Parks and gardens 1.43ha per 1,000 710m <u>walk</u> Green Flag ¹ standard in association with the Local Quality Vision sStatement					Include to paragraph D to clarify how open space requirements are dealt with in relation to the SANG. Notes Para 10.8 - change to fig 16 (not 12)
		Amenity green space 1.45ha per 1,000 480m <u>walk</u> <u>NBC Assessment Framework</u> in association with the Local Quality Vision Statement <u>Green Flag Standard</u>					
		Natural and Semi Natural Green Space 1.57ha per 1,000 720m walk <u>NBC Assessment Framework Green Flag Standard</u>					
		Children's Play and provision for young people 0.25ha per 1,000 of Designated Equipped Playing Space including teenage provision 400m <u>walk</u> for teenage LEAP 1,000m <u>walk</u> for NEAP 1,000m <u>walk</u> for teenage facilities		New LEAPs and NEAPs should meet the Fields in Trust ² standards as relevant to the individual site. New youth provision should reflect current best practice, and also take into account the needs expressed by young local people.			
		Allotments 0.36ha per 1,000 1,000m <u>walk</u>		Allotments should be secure with gates and fencing			

¹ <https://www.greenflagaward.org//media/1019/green-flag-award-guidelines.pdf>

² <https://www.fieldsintrust.org/knowledge-base/guidance-for-outdoor-sport-and-play>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>				Reason for modification									
		<table border="1" data-bbox="552 384 1505 1215"> <tr> <td data-bbox="552 384 765 743"></td><td data-bbox="765 384 978 743"></td><td data-bbox="978 384 1505 743"></td></tr> <tr> <td data-bbox="552 743 765 983">Civic Spaces</td><td data-bbox="765 743 978 983">Specific to the locality. No set standard required.</td><td data-bbox="978 743 1505 983"><u>Green Flag Standard</u></td></tr> <tr> <td data-bbox="552 983 765 1215">Cemeteries and closed churchyards</td><td data-bbox="765 983 978 1215">Specific to the locality. No set standard required.</td><td data-bbox="978 983 1505 1215"><u>Green Flag Standard</u></td></tr> </table>						Civic Spaces	Specific to the locality. No set standard required.	<u>Green Flag Standard</u>	Cemeteries and closed churchyards	Specific to the locality. No set standard required.	<u>Green Flag Standard</u>	<p>providing suitable and accessible areas for growing, and where applicable, an adequate water supply and car parking.</p> <p>Include new paragraph D.</p> <p>D. Where Suitable Alternative Natural Greenspace (SANG) is required it is accepted that this may meet or contribute to the requirements of open space set out in the table above.</p>	
Civic Spaces	Specific to the locality. No set standard required.	<u>Green Flag Standard</u>													
Cemeteries and closed churchyards	Specific to the locality. No set standard required.	<u>Green Flag Standard</u>													
Include the following wording after para 10:15: <u>Biodiversity maps for Northampton can be found on the West Northamptonshire Council website, as well as through the Northamptonshire Biodiversity Records Centre.</u>															
Replace existing policy, with two policies:															
<p><u>POLICY 29A – Supporting and Enhancing Biodiversity</u></p> <p>A. The Council will require all development proposals to provide a net gain in biodiversity through the creation or enhancement of habitats by:</p> <ul style="list-style-type: none"> i. Incorporating and enhancing existing biodiversity features on and/or off site; ii. Consolidating, developing and enhancing functionality of ecological networks including those beyond the Local Plan's boundary; and iii. Managing, monitoring and maintaining biodiversity within a development. <p>B. Proposals should enhance natural capital and be designed around the existing components of the ecological network including sites of national or international importance, sites of local importance and other biodiversity assets.</p>				To take into account advice provided by Natural England to split the policy into two: covering biodiversity and nature conservation.											

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification
		<p>C. All applicants are expected to assess the impacts of their proposals on biodiversity, including indirect impacts such as recreational activities. Applicants should have regard to the Northamptonshire Biodiversity Action Plan and the latest guidance on biodiversity net gain when developing proposals. The Council requires applicants to use a recognised biodiversity calculator such as the DEFRA metric.</p> <p>D. Development that does not achieve biodiversity net gain, and fragments habitats and links will be refused.</p> <p>Policy 29B – Nature Conservation</p> <p>A. The Council requires development to protect, maintain and enhance biodiversity and geodiversity. All proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment. If harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for, planning permission will be refused.</p> <p>B. Proposals should have regard to principles set out in the Northamptonshire Biodiversity SPD or successor document and where necessary undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards to inform development.</p> <p>C. The Council will seek the protection or enhancement of the ecological network in proportion to the site's designation status, the contribution it makes to the ecological network and take account of considerations set out below:</p> <ul style="list-style-type: none"> I. Sites of national or international importance - Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest are of international and/or national importance and development affecting them will be expected to avoid causing adverse effects. II. Sites of local importance - Development affecting Northampton's Local Nature Reserves, Local Wildlife Sites, Local Geological Sites and Potential Wildlife Sites will be expected to avoid causing adverse effects on these assets unless it can be demonstrated that the benefits of development clearly outweigh the harm. III. Other biodiversity assets - Development affecting sites that are not formally designated, but which make a positive contribution to biodiversity, will be required to take into account their current or potential role in Borough's Northampton's wider biodiversity network. 	

MM27	<p>Paras 10.17, 10.18 and 10.20 and Policy 30</p> <p>Paragraph 10.17, amend to the following: <u>The Upper Nene Valley Gravel Pits Special Protection Area (SPA) Supplementary Planning Document (SPD) was adopted by West Northamptonshire Council in November 2021</u> the Council in 2015—and supplements the policies contained in the West Northamptonshire Joint Core Strategy (WNJCS). It highlights the requirement to consult Natural England on proposals that could affect the SPA and details consultation zones for different types of development. It should be referred to when preparing development proposals. A mitigation strategy <u>has also been adopted (March 2022)</u> will be prepared for the Upper Nene Valley Gravel Pits SPA which is appended to the above SPD, with a view to its subsequent adoption as an addendum to the SPD. It will advise applicants to ensure that development (standalone and cumulative) does not impact negatively on this biodiversity asset. This document will be produced within 12 months of the adoption of the Northampton Local Plan Part 2. However, the broad principles and a draft of the mitigation strategy agreed with Natural England will be prepared prior to the adoption of the local plan.</p> <p>Paragraph 10.18, amend to the following: <u>Since the adoption of the WNJCS, Natural England has continued to monitor visitor pressure on the SPA. Evidence shows that new housing within 3km of the SPA has increased recreational pressure, contributing to disturbance of, 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 within this local plan is addressed. With the amount of potential development being progressed within the vicinity, Northampton Borough Council will prepare an appropriate mitigation strategy to prevent additional pressure and disturbance to the birds. The strategy will draw on evidence of existing recreational impact and forecast additional impact from proposed residential growth, it will then identify suitable mitigation measures such as access management and monitoring to minimise impact on the SPA. Without mitigation, any increase in the number of residential units near the SPA has potential to increase the significance of the effect by increasing the number of visits to the designated site. To protect the SPA from recreational pressure as a result of residential development the mitigation strategy identifies a number of measures including provision of information panels and wardening of the SPA to educate visitors. Residential development is required to pay a Strategic Access Management and Monitoring (SAMM) contribution and / or provide bespoke mitigation to protect the SPA.</u></p> <p>Paragraph 10.19, remove final bullet point: <u>Monitoring of the impacts of new development on the SPA to inform the necessary mitigation requirements and future refinement of any mitigation measures</u></p> <p>Paragraph 10.20 - New sentence after the 1st sentence: <u>In addition, there could be impacts on areas of functionally linked land which support the bird species (golden plover and lapwing) for which the Upper Nene Valley Gravel Pits SPA has been designated.</u></p> <p>Policy 30, amend as follows: <u>Proposals must ensure that there is no adverse impact either alone or cumulatively on the Upper Nene Valley Gravel Pits SPA and Ramsar site. Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area (UNVGP SPA) must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.</u></p> <p><u>Where development is likely to have significant effects on the Upper Nene Valley Gravel Pits Special Protection Area, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the SPA Supplementary Planning Document.</u></p> <p><u>Applications comprising a net gain in residential units within 3 km of the Upper Nene Valley Gravel Pits SPA and Ramsar site will, in combination, have an adverse effect on the integrity of the SPA if not mitigated. need to demonstrate that the impact of any increased recreational activity or predation (indirect or direct) on the SPA and Ramsar site will not have a detrimental impact.</u></p>	<p>To reflect that the council has now adopted a mitigation strategy for Unit 1 of the Upper Nene Valley Gravel Pits SPA.</p>
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	<p>The Local Planning Authority has adopted a mitigation strategy for Unit 1 of the Upper Nene Valley Gravel Pits SPA which must be referred to when preparing an application that is located within 3km of Unit 1 of the SPA. Residential development will be required to pay a Strategic Access Management and Monitoring (SAMM) contribution and / or provide bespoke mitigation such as a Suitable Alternative Natural Greenspace (SANG) in order to mitigate recreational impact. will prepare a Mitigation Strategy document concerning the UNVGP SPA which is to be adopted as an Addendum to the UNVGP SPA Supplementary Planning Document by the time this Local Plan is adopted. In some cases developments will be expected to provide bespoke mitigation such as Suitable Alternative Natural Greenspaces (SANGs).</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</p> <p>Other adverse effects could include the loss or fragmentation of functionally linked land supporting habitat, non-physical disturbance (noise, vibration or light), and impacts due to water runoff. Sites that could potentially be functionally linked land associated with the SPA will need to undertake overwintering bird surveys early in the planning process ahead of submitting an application., 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>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>In order to protect sightlines for birds included within the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar site, new development within a 250m zone of the Special Protection Area and Ramsar site shown on the policies map must undertake an assessment to demonstrate that it will not have a significant adverse effect on birds within the area or, if directly adjacent to existing buildings, should reflect surrounding building heights.</p>
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Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is underlined	Reason for modification
MM28	Paragraph 10.26 and Policy 31	Paragraph 10.26, add to the end: <u>All proposals should be developed consistent with guidance from Historic England and heritage best practice.</u> Policy 31, amend last bullet point: <ul style="list-style-type: none"> • v) Being consistent with <u>Having regard to</u> guidance from Historic England and heritage best practice 	To reflect the recommendation provided by the Planning Inspectors.
		Chapter 11: Movement	
MM29	Policy 32	Remove the 1 st paragraph and replace with the following text: In order to deliver a high quality, accessible sustainable transport network, the Council will require developers to fund and financially contribute towards a range of transport schemes through the relevant legal agreements and planning conditions, in order to meet the growth requirements of this local plan, to mitigate the impacts of developments and to ensure they create a high quality, sustainable, accessible development that is well connected to the rest of the Borough. <u>A. In order to deliver a high quality, accessible and sustainable transport network proposals will be required to deliver or contribute to the infrastructure projects contained within Appendix D of this Plan which are necessary to make them acceptable as per the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (or subsequent policy/regulations).</u> All major applications will also be required to include a Travel Plan. Applicants will be required to demonstrate that they can mitigate the proposal's transport impact either on site or off site. <u>B. Developments should be designed to incorporate, demonstrate and achieve the following sustainable travel principles:</u> <ul style="list-style-type: none"> • i. To promote, improve and encourage active lifestyles and health and wellbeing • ii. To promote modal shift away from and reduce car usage • iii. To improve accessibility by, and usability, of sustainable transport modes including public transport • iv. To maximise opportunities for integrated secure and safe walking and cycling routes which connect to the existing network (<u>including public rights of way</u>), as well as open spaces and green infrastructure • v. To secure a high quality design of the street scene which creates a safe, secure and pleasant environment • vi. To upgrade and improve the existing street scene • vii. To design developments including the provision of streets, streetscapes and open spaces which enable and encourage children to walk, cycle and play within their local environments • viii. To promote sustainable travel to day-to-day destinations including the town centre, the railway station, the bus station, places of work, schools and colleges, health facilities and local leisure and recreation facilities • To provide electric vehicle re-charging points in line with Policy 34 and Policy 35 Major new developments of 10 dwellings or more, or 0.5ha or more, must include a long term management strategy (travel plan) for integrating proposals to promote and encourage sustainable travel and reduce greenhouse gas emissions, including travel planning for new users <u>C. Applications for major new developments will need to be accompanied by a Travel Plan. The Travel Plan needs to specify a long-term management strategy for integrating proposals to promote and encourage sustainable travel and reduce greenhouse gas emissions. This will include travel planning for new users. Applicants will need to demonstrate that they can mitigate the proposal's transport impact either on site or off site.</u>	To ensure Policy 32 is effective, clear and unambiguous for decision makers.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification
		<p>Wording to be deleted is struckthrough</p> <p>New wording is underlined</p>	
		<p>E. Development in the town centre will be expected to contribute towards the creation of new public routes and the facilitation of access, circulation and ease of use.</p>	
MM30	Policy 33	<p>Amend 1st bullet point:</p> <p>i. There would be no unacceptable impacts on highway safety and that the residual cumulative impacts on the road network are not severe, adverse impacts on the local and/or strategic transport network which cannot be mitigated against. Major planning applications and development All development proposals.....by a Transport Assessment or Transport Statement; and</p>	To ensure consistency with the NPPF.
MM31	Paragraph 11.16 and Policy 34	<p>Amend paragraph 11.15 as follows:</p> <p>There is a range of planned and potential future transport projects that will take place during and beyond the Local Plan period including the Brackmills & Castle Northampton Station Corridor improvements, the North West Relief Road, the Northern Orbital Route, the Northampton Growth Management Scheme affecting the A45 and the dualling of the A43 from Northampton to Kettering. In addition, a number of strategic opportunities have been identified that have the potential to improve the range of destinations served by direct trains from Northampton and to improve access between cities to the north of Northampton, Northampton and the wider Oxford-Cambridge Corridor. Accordingly, the route of the former Northampton to Market Harborough railway has been safeguarded as a potential transport corridor.</p> <p>Amend paragraph 11.16 as follows:</p> <p>The former Northampton to Market Harborough railway line now plays a significant role in the biodiversity network of Northampton and beyond, with a series of identified Local Wildlife Sites (LWS) located within / alongside it due to the species rich neutral grasslands (a Priority Habitat under the Natural Environment and Rural Communities Act, 2006) found within them, as well as itself, being a wildlife corridor. Any reopening of the former Northampton to Market Harborough railway line will be led by Network Rail and will need to be subject to relevant studies that consider alternative options and provide justification for the most sustainable option, bearing in mind its high biodiversity status. If further evidence emerges that the future use of this link for transport is viable, the use of this route will need to be investigated in a future local plan review.</p> <p>Amend paragraph 11.17 as follows:</p> <p>A safeguarded corridor between Brackmills and Castle Northampton Station is identified for use as a continuous public transport, cycling and/or walking route. The Council needs to safeguard the land required for transport-related developments to be progressed. Any proposals affecting this corridor should mitigate against the potential adverse impacts on biodiversity, and seek to secure net gain, in compliance with the relevant policies in this local plan. If further evidence emerges that the future use of this link for transport is viable, the use of this route will need to be investigated in a future local plan review.</p> <p>Policy 34, amend 1st paragraph as follows:</p>	<p>Route is no longer safeguarded.</p> <p>To ensure that the route is capable of being investigated in a future local plan review.</p> <p>To ensure that the route is capable of being investigated in a future local plan review.</p>

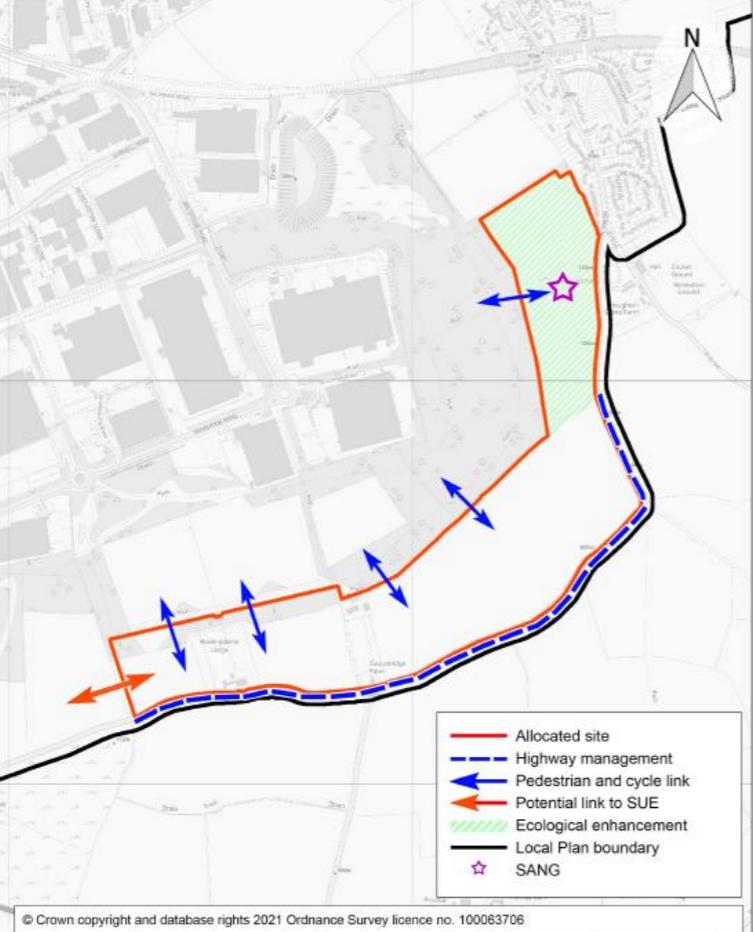
Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	
		<p>A. The routes<u>s</u> of the former Northampton to Market Harborough and Northampton to Brackmills railway lines, as shown on the Policies Map, is safeguarded <u>may be investigated</u> for future transport use <u>in a local plan review</u>.</p> <p>Amend last bullet point to read:</p> <p>D. Transport schemes which provide an element of environmental protection will be prioritised. In some cases, it may be necessary to <u>have regard to mitigation measures provide mitigation</u> in line with table 10 of the Northampton Low Emission Strategy 2017 (or the appropriate part of a successor document) <u>namely:-</u></p> <p><u>Implementation and operation of Clean Air Zones (CAZ) or Low Emission Zone</u> <u>Development of Ultra-Low Emission Hubs and Corridors</u> <u>Northampton Electric Vehicle Plan</u> <u>Cycling Hubs</u> <u>Plugged-in development and demonstration schemes</u> <u>Infrastructure for low emission, alternative fuels including refuse collection services</u></p>	To ensure GI is taken into consideration in any proposals. To ensure criterion is effective, clear and unambiguous for decision makers.	
MM32	Policy 35	<p>Amend policy to read:</p> <p>New development must meet adopted parking standards and accord with <u>have regard to</u> the principles set out in the Parking Standards SPD, including the provision of facilities for electric vehicle charging points. <u>Proposals for</u> Transport schemes and major new developments should also provide a car parking management strategy.</p>	To correctly reflect the relationship between the policy and supplementary planning document To delete element that repeated Policy 32	
		Chapter 12: Infrastructure		
MM33	Paragraph 12.6	<p>Add three new sentences at the beginning of paragraph 12.6:</p> <p><u>Part R of the Building Regulations (Physical Infrastructure for high-speed electronic communication networks) require the provision of in-building physical infrastructure from the service provider's 'access point' to the occupier's 'network termination point'. Objective 13 of the Plan seeks to enhance local services and ensure technology infrastructure is adequately provided to meet the needs of people and business and to ensure that relevant utilities are provided prior to occupancy. Policy 36 ensures that in-building broadband infrastructure is connected to infrastructure provided in the vicinity.</u></p>	To clarify the complementary relationship between the requirements of Part R of the Building Regulations and Policy 36.	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification
MM34	Paragraphs 12.12 and 12.13 and Policy 37	<p>Amend paragraph 12.12: The plan calculates the additional school places required to accommodate the future growing population <u>as a result of changes to birth rate and inward migration levels. The impact of additional housing growth allocated through the local plan process is expected however to place further pressure on local school capacity.</u> 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 funding agreements with the Secretary of State for Education. <u>The majority of new schools delivered in Northampton will be free schools.</u></p> <p>Amend paragraph 12.13: The funding provision for <u>education new school places</u> is provided through a number of mechanisms including from the Government; the Education, <u>Skills and Funding Agency</u> and through securing funding from developers via Section 106 Agreements and the Community Infrastructure Levy <u>where schools are required as a result of housing growth.</u> 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 <u>in order to mitigate the development,</u> where it is to be located and the associated cost.</p> <p>Insert new paragraph after 12.13: <u>It will also 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.</u></p> <p>Policy 37, delete last sentence of 1st paragraph: <u>Developers are also required to provide delivery of "full fibre" connectivity to new built development.</u></p>	To reflect consultation from former Northamptonshire County Council and to provide further factual details. To ensure provision is made where appropriate for Early Years provision. To avoid duplication of Policy 36.
Chapter 13: Site Specific Allocations and Policies			
MM35	Policy 38	<p>Delete current paragraphs 13.1 to 13.3 <u>13.1 The West Northamptonshire.....through to heritage specialists.</u></p> <p>and replace with <u>13.1 This plan makes allocations for housing and employment use in policies 13 and 17A. For most of the allocations, sufficient guidance on requirements for planning applications is provided by the polices in this and other development plan documents. Some sites have a number of constraints where additional policy guidance is necessary. The following sections of this plan provide this additional guidance.</u></p> <p>Delete Policy 38 in its entirety</p> <p><u>Policy 38 DEVELOPMENT ALLOCATIONS.....and other material considerations.</u></p>	To provide clarity on the different development allocations within the local plan.
MM36	Paragraphs 13.6 and 13.9 and Policy 39	<p>Amend paragraph 13.6</p> <p>Amend 2nd sentence: <u>Network Rail has indicated that subject to the current and future freight/ commercial operation being moved elsewhere, provision of a suitable replacement site to accommodate railfreight activities</u> this opens up the potential for the residual railway land to be developed.</p> <p>Add a new paragraph after 13.9: <u>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 this into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access</u></p>	To reflect comments from Network Rail.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification
		<p><u>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.</u></p> <p>Policy 39, amend 5th paragraph: <u>...residential and ancillary Class A Class E uses.</u></p> <p>6th paragraph, amend: <u>On site LAA0333, the Council will support the delivery of at least 200 about 188 dwellings.....</u></p> <p>9th paragraph, amend 1st bullet:</p> <ul style="list-style-type: none"> • i. A high quality development that preserves and enhances the significance <u>and appreciation</u> of the former castle site and in particular the scheduled monument and listed Postern Gate and the setting of these heritage assets., <u>its designated components and their setting. Design and capacity will be informed by detailed archaeological investigations and assessments in advance of development. The proposals should provide opportunities to enhance the significance of the identified heritage assets</u> <p>Add a new paragraph at the end of the policy</p> <p><u>L. Any proposal should include the safeguarding of suitable access for the maintenance of foul drainage infrastructure.</u></p>	To reflect change in the Use Classes Order To reflect the consultation response from Anglian Water and to strengthen the policy position.
MM37	Paragraphs 13.12, 13.14 Policy 41 and Figure 20	<p>Add the following after the last sentence of paragraph 13.12: <u>It is therefore important to ensure that there is a reasonable buffer created between this existing village and the new development on The Green to ensure that the setting of the conservation area and its heritage assets can be respected and protected, and the identity of the village is maintained. There will also be an opportunity to provide semi natural stepping-stones (connected habitats) adjacent to and within the site that will provide habitat links.</u></p> <p>Add a new paragraph after 13.14 <u>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.</u></p> <p>Amend Policy 41 as follows:</p> <p>POLICY 41 THE GREEN, GREAT HOUGHTON (LAA1098)</p> <p>Housing development of up to <u>about</u> 800 dwellings, which comply with the development principles shown on Figure 20 will be supported at <u>The Green, Great Houghton</u>, subject to the following criteria being met:</p>	To reflect consultation responses.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is underlined	Reason for modification
		<p>i. Winter Surveys are undertaken to determine identify whether the site is used by over-wintering Golden Plover / Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat. I.e. to be carried out in the winter. If significant numbers of Golden Plover or Lapwing are identified at the site, offsite mitigation will be required for the loss of habitat I.e. functionally linked land.</p> <p>ii. 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.</p> <p>iii. Any d Development on this site must adhere to Policy 30 of this Plan, in particular with reference to recreational disturbance and functionally linked land associated with the Upper Nene Valley Gravel Pits Special Protection Area.</p> <p>iv. The built development should only take place outside of the area shaded green in the diagram</p> <p>v. The s Schemes 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</p> <p>vi. 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 Hardingshawe to the west. Special regard to Hardingshawe Lodge will need to be incorporated in any proposal</p> <p>vii. 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. Appropriate types of habitat and accessibility are to be determined following surveys for Special Protection Area birds</p> <p>viii. The development provides suitable transport links to neighbouring developments, including neighbourhood centres and community facilities</p> <p>ix. 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 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> <p>x. Any p Proposals that comes forward should include suitable measures to mitigate the impact of additional traffic generated by the development/. The vehicular access to the site shall not use the Green as a principal access and the development should seek to minimise additional traffic through Great Houghton village, and reduce the potential for traffic to use the Green or routes through the allocation to travel between the Newport Pagnell Road and the Bedford Road</p> <p>xi. Any proposal should also include Proposals will be informed by air quality and noise impact assessments due to proximity to from the Brackmills Industrial Estate</p> <p>xii. Any a Applications on the site will need to be accompanied by an archaeological investigation that considers any archaeological potential on the site.</p> <p>xiii. Proposals must be accompanied by a landscape vision for the site including details of how views across the site into and out of the village of Great Houghton will be managed, especially views of the Grade II* listed church. The location and layout of the SANG could must assist in achieving the landscape vision for the site.</p> <p>xiv. Any proposal forwarded Proposals for this site should be accompanied by a site specific Flood Risk Assessment meeting the design standard for the Upper Nene catchment through Northampton of a 0.5% probability (1 in 200 chance of occurring in any given year) event plus climate change. Surface water attenuation should be provided up to this standard. 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 protect against pluvial flooding.</p> <p>xv. 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>xvi. The safeguarding of suitable access for the maintenance of foul drainage infrastructure is maintained.</p> <p>xvii. A Suitable Alternative Natural Greenspace (SANG) will be secured.</p> <p>xviii. Proposals must be informed by a masterplan for the whole allocation which will be expected to:</p>	

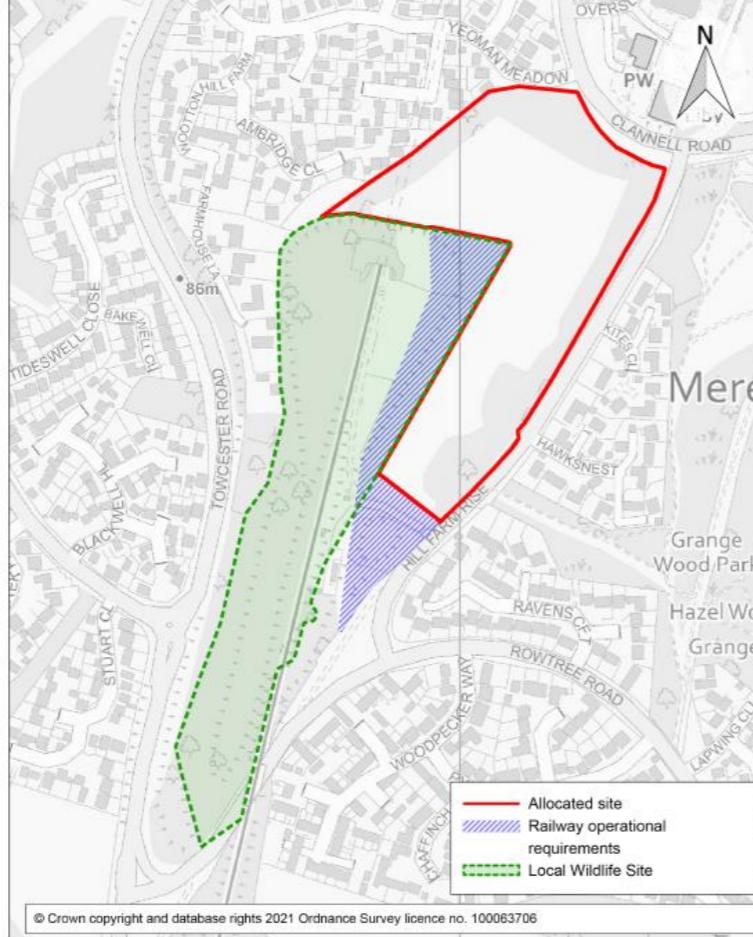
Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification
		<ul style="list-style-type: none"> a. <u>Take into consideration the surrounding townscape character and remain sensitive to the existing small-scale residential development within Great Houghton to the east and Hardingstone to the west</u> b. <u>Provide suitable transport links to neighbouring developments, including neighbourhood centres and facilities</u> c. <u>Manage and control vehicular access to and from the site to the northern section of The Green near to the village of Great Houghton, minimise traffic through Great Houghton and provide alternative means of accessing the site other than from The Green.</u> d. <u>Connect the site to nearby Brackmills Country Park and surrounding areas including pedestrian and cycling provision to secure connectivity and permeability within the site, to the employment area to the north, the proposed residential areas to the west along The Green and to Great Houghton as shown on Figure 20</u> e. <u>Provide a SANG within the area identified in Figure 20 which provides the following:</u> <ul style="list-style-type: none"> i. <u>Protection, enhancement and / or creation of habitats in line with other policies of this plan</u> ii. <u>Accessibility for residents' recreation including an off-lead dog walking area</u> iii. <u>A circular walking route around the SANG and eastern development area</u> iv. <u>A clear separation between the developed site and the village of Great Houghton in order to protect its setting and the heritage assets of the village</u> v. <u>Formal and informal open space</u> vi. <u>A SANG car park</u> vii. <u>If any part of the SANG is proposed off-site, the SANG will need to be adjoining the site.</u> <p>xix. <u>Ensure built development (other than as may relate to recreation and SANG functions) only takes place outside the SANG, the broad location of which is defined in Figure 20.</u></p> <p>Revised Figure 20:</p>	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification
			
MM38	Policy 43 and Figure 22	<p>Policy 43:</p> <p>Amend 1st paragraph:</p> <p>A. Ransome Road will be developed for at least 200 <u>about 500</u> dwellings.....</p> <p>Amend 1st bullet point:</p> <ul style="list-style-type: none"> • i. 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 <p>Add new bullet point at the end of the bullet points:</p> <ul style="list-style-type: none"> vi. <u>Design and capacity will be informed by detailed archaeological investigations and assessments in advance of any planning application being submitted.</u> <p>Amend legend in figure 22:</p> <p>Green Corridor<u>Greenspace</u> <u>(indicative)</u></p>	It has been demonstrated that the sites is able to accommodate a significantly larger number of dwellings.

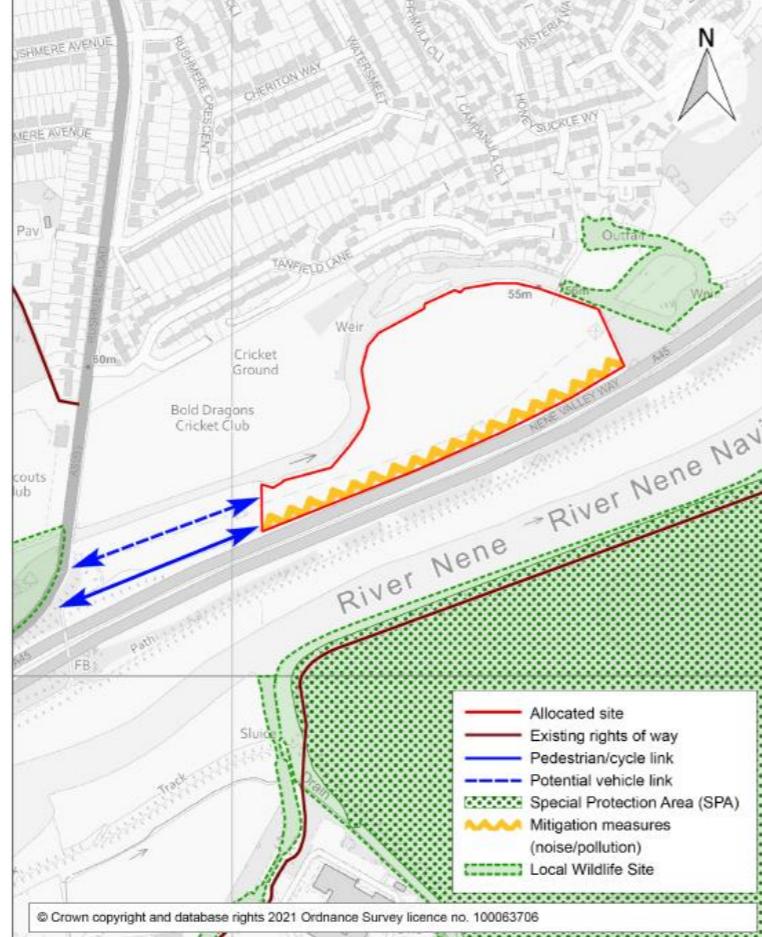
Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification
MM39	Policy 44	Amend 3 rd bullet point: ...in the region of about 5 dwellings.... Add new paragraph at the end of the bullet points: <u>C. Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS)</u>	To reflect consultation response from Anglian Water.
MM40	New Policy 45	Add new site specific policy: <u>g. Hill Farm Rise, Hunsbury Hill (LAA1100)</u> <u>13.24 The site is approximately 4.44 hectares in size and is located in Hunsbury, south west Northampton. It is surrounded by a mix of uses including the Mereway Neighbourhood Centre with Tesco Mereway, a library and a Church to the north and north east; residential to the east and west and the railway line and a Local Wildlife Site to the south/ south west.</u> <u>13.25 The site adjoins a railway line, which then runs in a tunnel (Hunsbury Hill tunnel) under part of the site. The railway forms part of the Northampton Loop Line of the West Coast Main Line. Also adjoining the site is an area which is used for railway operational purposes including access. In addition, there is a significant number of trees on the site, particularly along the border. There is a possibility that the site also has some priority habitat grassland that may require protecting. The majority of the site is also a potential wildlife site.</u> <u>13.26 The site is located within Flood Zone 1. The site is also located within 3 miles of the Strategic Road Network and any development on the site could potentially impact on the M1 and the A45.</u> POLICY 45 HILL FARM RISE, HUNSBURY HILL (LAA1100) <u>Housing development of about 80 dwellings at Hunsbury Hill will be supported subject to the following criteria being met. Proposals will be required to:</u> <u>i demonstrate, through an ecological survey and landscape assessment, the opportunities and constraints offered by the existing natural environment including the high presence of established trees, potential priority habitat grassland and potential wildlife site within the site, and how these are to be protected and/ or how any adverse impacts are to be mitigated against</u> <u>ii ensure that any proposal will be designed in a manner which is sensitive towards the presence of the Local Wildlife Site adjoining the development site including the potential to make the site more resilient to visitor pressure</u> <u>iii ensure that the operational requirements of the rail network, including access, are retained within the area shown hatched on Figure 24</u>	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification
		<u>iv demonstrate, through the use of design and building materials, that adverse impacts from noise, particularly from the railway operations, will be reduced</u> <u>v improve connectivity and accessibility to the Mereway neighbourhood centre to encourage walking and cycling</u> <u>vi ensure that any proposal for this site is accompanied by a site-specific Flood Risk Assessment</u> <u>vii demonstrate, subject to detailed assessment (including an assessment of contaminated land), that any development on the site maximises the use of Sustainable Drainage Systems (SuDS) to reduce the rate of surface water run off</u> <u>viii prepare a detailed Transport Assessment that includes consideration of the impact of the scheme on the A45 and the M1.</u>	

FIGURE 24: DEVELOPMENT PRINCIPLES FOR HILL FARM RISE

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification
		 <p>The map shows the location of Abington Mill Farm (LAA1107) in Northampton. It highlights several key areas: an 'Allocated site' (red outline), 'Railway operational requirements' (blue hatched area), and a 'Local Wildlife Site' (green dashed outline). The map also includes a north arrow and a scale bar indicating 86m. Labels on the map include: OVERS, YEOMAN MEADON, PW, CLANNELL ROAD, TIDESWELL CLOSE, AMBRIDGE CL, STUART CL, BLACK MELLY, HILLFARMHOUSE, RAVENS CL, ROWTREE ROAD, WOODPECKER WAY, and Mere.</p> <p>© Crown copyright and database rights 2021 Ordnance Survey licence no. 100083706</p>	
MM41	New Policy 46	<p>Add a new site specific policy</p> <p><u>h. Abington Mill Farm (LAA1107)</u></p> <p><u>13.27 Abington Mill Farm is located approximately 2 miles (3.2km) east of Northampton's town centre and is 5.02ha in size. It is an area of open land bounded by housing to the north; a sports pitch and informal parking area to the west; and additional open space, the A45 and the River Nene to the south. The site is within 5 to 10 minutes' walk of Billing Road, which is well served by buses and has cycle lanes.</u></p> <p><u>13.28 Close to the site, on the south side of the A45 is the Upper Nene Valley Gravel Pits Special Protection Area and Brackmills employment area. Both are accessible from the site via an overhead bridge across the A45. To the south east of the site, and south of Bedford Road, is the Barnes Meadow Local Nature Reserve.</u></p> <p><u>13.29 The site is located mostly within Flood Zone 2 with pockets of Flood Zones 3a and 3b within the site. Flood defences have been installed around the site. Because it is close to the A45, development on this site may have an impact on the strategic road network.</u></p> <p><u>13.30 The site is also located close to one of the local green infrastructure networks, of which there are 9 in total in the Northampton area. Component F is the 'Washlands and Eastern Nene' and comprises the floor of the Nene Valley from the town centre at Midsummer Meadow eastwards to the NRDA boundary. It broadly follows the Nene Valley sub-regional Corridor (Northampton to Wansford (Cambs)). The Green</u></p>	<p>To reflect recommendation provided by the Planning Inspectors, to ensure that issues of access, flood risk and green infrastructure / open space are addressed.</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification
		<p>Infrastructure Plan (2016) identifies a list of projects for each component, which can contribute towards enhancing these green infrastructure networks.</p> <p>POLICY 46</p> <p>ABINGTON MILL FARM (LAA1107)</p> <p>Abington Mill Farm will be developed for about 125 dwellings. The site will be developed in a manner consistent with the diagram shown in Figure 25 below:</p> <p>Proposals will be required to:</p> <ul style="list-style-type: none"> i) <u>Include measures to mitigate against the impacts of noise and pollution from the A45 dual carriageway</u> ii) <u>Demonstrate that Provide a safe and secure access from Rushmere Road can be provided in a manner that would pass the exceptions test</u> iii) <u>Include a travel plan, to demonstrate how traffic matters will be mitigated against and managed along Rushmere Road and the Barnes Meadow interchange</u> iv) <u>Incorporate proposals to encourage cycling and walking, taking advantage of the availability of cycle routes to the south of the A45 which have access to the town centre and areas east of Northampton</u> v) <u>Contribute to improvements to the green infrastructure network to include projects within the Washlands and Eastern Nene corridor, such as the Upper Nene Valley Gravel Pits and Barnes Meadow Local Nature Reserve</u> vi) <u>Maximise the use of Sustainable Drainage Systems (SuDS) to reduce the rate of surface water run-off</u> vii) <u>Include 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 allowance for climate change to protect against fluvial flooding</u> <p><u>FIGURE 25: DEVELOPMENT PRINCIPLES FOR ABINGTON MILL FARM</u></p>	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification
		 <p data-bbox="565 1320 1327 1343">© Crown copyright and database rights 2021 Ordnance Survey licence no. 100063706</p>	
		Chapter 14: Implementation and Monitoring Framework	
MM42		Changes as set out in Appendix 3	To reflect changes in the main content of the plan.
MM43	Glossary	Add: <u>Functionally linked land</u> <u>Any land outside of the European designated site which is used by species that are qualifying interest features of that designated site</u> <u>Playing pitches</u> <u>Pitches for playing sports covering football, cricket, rugby, hockey, rugby league and baseball.</u> <u>Sports facilities</u> <u>Includes sports hall, swimming pools, health and fitness, athletics, squash, gymnastics, bowls, tennis, golf, village and community halls, cycling, netball, judo, countryside and water sports, rowing, canoeing and orienteering.</u>	To clarify terms used in the plan.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is underlined	Reason for modification
		Non-statutory nature conservation site <u>An area of land designated for its nature conservation value but which does not receive statutory protection. Some non-statutory sites may however receive a degree of protection under national or local policy. In Northamptonshire these sites include Local Wildlife Sites (LWS), Local Geological Sites (LGS), Potential Wildlife Sites (PWS) and Protected Wildflower Verges (PWV).</u>	
		Appendix A: Northampton housing trajectory for sites allocated in the Local Plan Part 2 (excluding sustainable urban extensions)	
MM44	175	See table attached at Appendix 2 to this document.	
		Appendix B: Superseded Policies	
MM45	182	See tables attached at Appendix 4 to this document.	
		Appendix D: Transport and Infrastructure Schedule	
MM46	191	Change the 'Sub Total NRDA Transport Infrastructure Known Costs': <u>£155.47 £148.22m</u>	Original total was incorrect
		Appendix G: Primary Education	
MM47	194	Remove line E41 - new three form entry primary school in Collingtree Remove line E42 – new two form entry primary school in Duston	Schools have been removed from the programme

APPENDIX 1 – Proposed Modifications to Policy 13 – MM 13

POLICY 13

RESIDENTIAL AND OTHER RESIDENTIAL LED ALLOCATIONS

The following sites are allocated for residential and/or residential led development. The capacities identified are indicative only and are dependent on compliance with other policies in this and other development plan documents. Other policies of particular relevance in this plan (non exhaustive) are indicated

Reference	Location	Indicative Dwelling Capacity	Relevant policies (non-exhaustive)	Reason for change (this column will not be included in the adopted plan)
0168	Rowtree Road	131		Combined with other sites into LAA 1144
0171	Quinton Road	19-14	Policy 7 - Flood risk and Water Management	Capacity reduced as a result of the Flood Risk Assessment.
0174	Ransome Road Gateway	24	Policy 7 Policy 31 BN5 of the West Northamptonshire Joint Core Strategy BN9 of the West Northamptonshire Joint Core Strategy	
0193	Former Lings Upper School, Birds Hill Walk	60 (5YHLS)		Site removed from five-year housing land supply because no evidence it is deliverable in that time.
0195	Hunsbury School, Hunsbury Hill	73 (50 in HLS)		Site removed from allocation as scheme is almost complete. .
0204	The Farm, Hardingstone	100 55	Policy 30 Policy 31 BN5 of the West Northamptonshire Joint Core Strategy	To correct error regarding capacity.
0205	Parklands Middle School, Devon Way	132 (5YHLS)		Removed from allocation as site is currently an Amenity Green Space typology and site is currently under construction
0288*	Northampton Railway Station car park	68 (5YHLS) 280	Policy 39 Policy 31 BN5 of the West Northamptonshire Joint Core Strategy	To reflect revised capacity agreed in SOCG.
0333*	Northampton Railway Station (railfreight)	200-188	Policy 7 Policy 39 Policy 31 BN5 of the West Northamptonshire Joint Core Strategy	Capacity reduced as a result of the Flood Risk Assessment.
0335	Chronicle and Echo North	42 (6 in 5YHLS)	Policy 31 BN5 of the West Northamptonshire Joint Core Strategy	
0336	Chronicle and Echo South (rear of Aldi)	14 (5YHLS)		Site was completed in 20/21.
0338	Countess Road	68 (64 in 5YHLS) Net:4		Conversion is underway for 68 units
0403	Allotments Studland Road	23		Removed from allocation as site is currently an allotment typology

0629	British Timken	138 (5YHLS) <u>121</u>		Site is under construction, 15 units complete, 121 units remaining as at 1 st April 2021
0657	Fraser Read	140		Removed from allocation as site is currently an Amenity Green Space typology
0685	Adj 12 Pennycress Place, Ecton Brook Road	12		Removed from allocation as site is currently an Amenity Green Space typology
0719	Car garage workshop, Harlestone Road	35	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	
0720	Ryland Soans garage, Harlestone Road	62	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	
0767	Spencer Street	25 (5YHLS)	<u>Policy 7</u>	
0903	Hawkins Shoe Factory, Overstone Road	105 (5YHLS)	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	
0910	379 Harlestone Road	14		
0932	Site 1 Southbridge Road	45 (5YHLS)	<u>Policy 7</u>	
0933	Site 2 Southbridge Road	28 50 (5YHLS)	<u>Policy 7</u>	To better reflect capacity
1006	Pineham	80 106	<u>Policy 7</u>	To reflect capacity of current planning application.
1007	Land south of Wooldale Road, east of Wootton Road	16 22	<u>Policy 7</u>	Capacity reduced as a result of the Flood Risk Assessment.
1009	Land west of Policy N5 Northampton South SUE (site 1)	100		Combined with other sites into LAA 1144
1010	Land at St Peter's Way/ Court Road/ Freeschool Street	5	<u>Policy 31</u> <u>BN5 of the West Northamptonshire Joint Core Strategy</u>	
1013	University of Northampton Park Campus	585 653 (5YHLS)		To reflect remaining capacity as at 1 st April 2021.
1014	University of Northampton Avenue Campus	170 200		To reflect capacity of current planning application.
1022	Belgrave House	122 99 (5YHLS)	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	To reflect capacity of planning permission
1025	Land to the west of Towcester Road	180 230	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	Increased capacity agreed in Statement of Common Ground.
1026	Eastern land parcel, Buckton Fields	14	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	

1036	Derwent Drive garage site, Kings Heath	8-5		Permission granted for 5 units
1037	Swale Drive garage site and rear/ unused land	6 (5YHLS)		Site was completed in 20/21.
1041	Newham Road, Kingsthorpe	15		Removed from allocation as site is currently an Amenity Green Space typology
1048	Stenson Street	6 2	<u>Policy 7</u>	Permission granted for 2 units
1049	Land off Arbour Court, Thorplands garage block	11 6		Permission granted for 6 units
1051a	Land between Waterpump Court and Billing Brook Road	8		Site was completed in 20/21.
1052	Land rear of garages in Coverack Close	13		
1058	Land off Oat Hill Drive, Ecton Brook	11		Removed from allocation as site is currently an Amenity Green Space typology
1060	Hayeswood Road, Lings	6		Removed from allocation as site is currently an Amenity Green Space typology and site is currently under construction
1071	2 sites off Medway Drive, near Meadow Close	9		
1086a	2 parcels of land in Sunnyside Estate (Cosgrove Road)	6		
1086b	2 parcels of land in Sunnyside Estate (Chalcombe Avenue)	7		
1094	Land off Holmeecross Road	15		Removed from allocation as site is currently an Amenity Green Space typology
1096	Land off Mill Lane	14	<u>Policy 31</u> <u>BN5 of the West Northamptonshire Joint Core Strategy</u>	
1097	Gate Ledge	30		Removed from allocation as site is currently an Amenity Green Space typology
1098*	The Green, Great Houghton	800 (A minimum of 225 of which will be provided within the plan period)	<u>Policy 41</u> <u>Policy 30</u> <u>Policy 31</u>	To identify what proportion of the allocation will be completed within the plan period.

			<u>BN5 of the West Northamptonshire Joint Core Strategy</u>	
1099	Upton Reserve site	40		Site is deleted because of flood risk issues
1100	Hill Farm Rise, Hunsbury Hill (50% of the site)	80	<u>Policy 29</u> <u>Policy 45</u>	
1102	Site east of Towcester Road	50-60	<u>Policy 29</u>	
1104	Watering Lane, Collingtree	265 (A minimum of 200 of which will be provided within the plan period)	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	To identify what proportion of the allocation will be completed within the plan period.
1107	Former Abington Mill Farm, land off Rushmere Road	125	<u>Policy 7</u> <u>Policy 29</u> <u>Policy 30</u> <u>Policy 45</u>	
1108	Former Dairy Crest depot, Horsley Road	35		
1109	Mill Lane	6 (5YHLS)	<u>Policy 31</u> <u>BN5 of the West Northamptonshire Joint Core Strategy</u>	
1113*	Greyfriars	400 (delivery could be post plan period)	<u>BN9 of the West Northamptonshire Joint Core Strategy</u> <u>Policy 42</u>	Part removed from allocation as part of site is currently an Amenity Green Space typology
1114	Cedarwood Nursing Home, 492 Kettering Road	2 (5YHLS) 31		Scheme under construction for 56 bed care home, equates to 31 dwellings.
1117	133 Queens Park Parade	6 (5YHLS) 8		Permission granted for 8 units
1121	Upton Valley Way East	34 (5YHLS)		Removed from allocation as site is currently an Amenity Green Space typology and site is currently under construction
1123	83-103 Trinity Avenue	9 (5YHLS)		
1124	41 – 43 Derngate	7 (5YHLS) 31	<u>Policy 31</u> <u>BN9 of the West Northamptonshire Joint Core Strategy</u>	Permission granted for 31 units
1126	5 Primrose Hill 4	6 (5YHLS)	<u>Policy 31</u> <u>BN9 of the West Northamptonshire Joint Core Strategy</u>	
1127	32 Connaught Street	6		Included in error
1131	The Leys Close, 39 Mill Lane	6 3	<u>Policy 31</u> <u>BN9 of the West Northamptonshire Joint Core Strategy</u>	To reflect remaining capacity as at 1 st April 2021.

1133	Eastern District Social Club	5 (5YHLS)	<u>Policy 29</u>	
1134	St John's Railway Embankment	12	<u>Policy 29</u>	
1137	Wootton Fields	74		
1138	Land south of Bedford Road	7		Site has failed the Flooding Exceptions test.
1139*	Ransome Road	200 (500 in 5YHLS) 500 (A minimum of 224 of which will be provided within the plan period)	<u>Policy 43</u> <u>Policy 31</u> <u>BN5 of the West Northamptonshire Joint Core Strategy</u>	To identify what proportion of the allocation will be completed within the plan period.
1140	Land north of Milton Ham	224	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	
1142	Land west of Northampton South SUE (site 2)	130		Combined with other sites into LAA 1144
1144	Land to the west of Northampton South Sustainable Urban Extension	361 (A minimum of 90 of which will be provided within the plan period)	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	This is the combination of LAA 0168, 1009 and 1142 into one allocation. The policy identifies what proportion of the allocation will be completed within the plan period.

Delete last sentence 'Development proposals marked..... and material considerations'.

Appendix 2

Update Appendix A to include the most recent information on housing sites allocated in Policy 13:

APPENDIX A

Northampton housing trajectory for sites allocated in the Local Plan Part 2 (excluding sustainable urban extensions)

Ref	Site Name	Yield in policy 13	2020/ 21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	TOTAL in policy 13
0171	Quinton Road	14					8	6				14
0174	Ransome Road Gateway	24				24						24
0193	Former Lings Upper School, Birds Hill Walk	60										0
0204	The Farm, Hardingstone	55			25	30						55
0288	Railway Station (car park)	280						140	140			280
0333	Railway Station (railfreight)	188							76	76	36	188
0335	Great Russell Street / Chronicle & Echo North	42			42							42
0338	Countess Road	68		68								68
0629	British Timken Site	121		94	23	4						121
0719	Car Garage Workshop, Harlestone Road	35				12	12	11				35
0720	Ryland Soans Garage, Harlestone Road	62				21	21	20				62
0767	Spencer Street	25		10	15							25
0903	Hawkins Shoe Factory, Overstone Road	105			33	33	39					105
0910	379 Harlestone Road	14			7	7						14
0932	Southbridge Site 1	45				45						45
0933	Southbridge Site 2	28				28						28

1006	Pineham	80			35	45					80
1007	Land south of Wooldale Road, east of Wootton Road	16			8	8					16
1010	Land at St Peter's Way / Court Road / Freeschool Street	5					5				5
1013	Park Campus	585		137	55	100	120	173			585
1014	Avenue Campus	170				50	50	70			170
1022	Belgrave House										
		122				122					122
1025	Land to the west of Towcester Road	230			30	40	40	40	40		230
1026	Eastern Land Parcel, Buckton Fields	14		5	9						14
1036	Derwent Drive garage site	5		5							5
1048	Stenson Street	2		2							2
1049	Land off Arbour Court, Thorplands garage block	6		6							6
1052	Land rear of garages in Coverack Close	13			5	5	3				13
1071	2 sites off Medway Drive, near Meadow Close	9			3	3	3				9
1086a	2 parcels of land in Sunnyside Estate (Cosgrove Road)	6			3	3					6
1086b	2 parcels of land in Sunnyside Estate (Chalcombe Road)	7			3	4					7
1096	Land off Mill Lane	14		14							14
1098	The Green, Great Houghton	800							50	75	100
1100	Hill Farm Rise, Hunsbury Hill	80				30	30	20			80
1102	Site east of Towcester Road	60				30	30				60
1104	Watering Lane, Collingtree	265			20	30	30	30	30	30	200
1107	Former Abington Mill Farm, land of Rushmere Road	125			10	30	30	30	25		125

1108	Horsley Road	35				15	20				35	
1109	Mill Lane	6			6						6	
1113	Greyfriars	400									0	
1114	Cedarwood Nursing Home, 492 Kettering Road	31		31							31	
1117	133 Queens Park Terrace	8			8						8	
1123	83-103 Trinity Avenue	9		9							9	
1124	41 - 43 Derngate											
		31		31							31	
1126	5 Primrose Hill	6		6							6	
1131	The Leys Close, 39 Mill Lane	3	3	3							3	
1133	Eastern District Social Club	5			5						5	
1134	St Johns Railway Embankment	12			6	6					12	
1137	Wootton Fields	74			25	25	24				74	
1139	Ransome Road	500				40	40	34	50	30	224	
1140	Land north of Milton Ham	224			25	50	50	50	49		224	
1144	Land to the west of Northampton South SUE	361								41	49	90
	SUB TOTAL			421	401	840	555	624	460	292	245	
	5 YEAR TOTAL											
	TOTAL	5485									3838	

For the most up to date information on housing completions, please refer to the West Northamptonshire Five Year Housing Land Supply Position Statement and Reports which are updated annually [Northampton Development Plan | Northampton Planning Policy | West Northamptonshire Council - Northampton Area](#).

APPENDIX 3 – Modifications to the monitoring framework MM44

Page Number in plan/Mod Number	Indicator (and Type)	Target	Main Policy Delivered	Additional Policies Delivered	SA Objective delivered?	Main Agencies (for delivery) / source (for monitoring data)	Trigger	Contingencies	Reason for change
136	<u>Building for life—100% of new residential development to achieve Built for Life Certification</u> <u>Major new residential development capable of achieving a Building for a Healthy Life commendation</u>	Applies to all residential development <u>of ten dwellings or more.</u>	2	3, 4	SA4, SA5, SA11	LPA (DM) / NCC / Developers	Where relevant permissions granted contrary to 'Built for Life' Panel <u>that are not capable of achieving a Building for a Healthy Life commendation</u>	Consider barriers to implementation. Further discussions with developers.	To reflect changes to the NPPF, with Building for Life being supplanted by Building for a Healthy Life, with consequential changes to Policy 2.
136	<u>Space standards—100% of residential should provide at least the minimum space standards as set out in the Nationally Described Space Standards</u>	Applies to all residential development	3	6	SA1, SA2, SA8	LPA (DM) / NCC / Developers	>10% of development fails to achieve standard	Consider barriers to implementation. Speak with developers to understand viability issues Review policy	No longer required. This aspect of Policy 4 has been recommended for deletion.
139	Mixed-use buildings	All major applications in local centres should include at least one mixed-use building.	14	4, 21	SA2, SA1, SA8	LPA (DM) / Developers			The measure does not relate to a policy of this plan, therefore, should be deleted
139	Concentration of HiMOs	No more than <u>10 ±5%</u> of dwellings within a 50m radius of the application sites are HiMOs	15		SA2	LPA (DM) / Developers	Data from DM identifies concentrations of HiMOs. Appeals	Identify reasons for approving HiMOs and alter policy.	Change percentage to align with policy 15.
139	Net additional pitches for gypsies, travellers and travelling showpeople	Planning approval for new pitches as identified in latest evidence as set out in Policy 16.	16		SA2	LPA (DM) / Developers / RSL	Additional pitches are not achieved by 2029	Identify no. Of applications	Policy 16 is deleted from Plan
141	Proposals and schemes contribute to range of retail, leisure and service-based	Delivery of schemes on identified sites within the town centre and central area in line with policy 8.	8	9, 11, 12	SA7	LPA (DM and Regeneration) / Developers	No development within 5 years of adoption of LPP2.	Consider barriers to delivery such as viability,	Remove 'central area' to reflect Modifications to policy 12

	offers in Northampton Town Centre and the Central Area							corporate mechanisms.	
142	Residential uses in town centre	5% of Northampton's new housing created in town centre	2	8	SA2, SA3, SA4, SA7, SA11	Developers / LPA (DM)	Annual monitoring of planning permissions within the town centre (including change of uses)	Identify barriers to delivery such as viability.	The measure does not relate to a policy of this plan, therefore, should be deleted
143	Protect safeguarded sites identified in Policy 17 and support new employment sites outside safeguarded areas	No net loss of safeguarded employment sites <u>unless there is marketing evidence to justify the loss and delivery of new employment sites in accordance with identified demand that is sustainably located.</u>	17	18	SA6	LPA/developers/business owners	<u>Planning approvals on sites that are safeguarded for employment purposes without justification.</u> <u>Loss of safeguarded employment land without justification.</u> <u>No new employment floorspace within 5 years of LPP2 adoption.</u>	Consider barriers to implementation. Review evidence and consider review.	Splitting the indicator into two: one to cover safeguarding and one to cover delivery of new employment opportunities is more meaningful.
143	<u>Support the delivery of new employment sites outside the safeguarded areas as promoted in Policy 17a and Policy 18</u>	<u>New employment to be delivered on the sites identified for allocation and on suitable windfall sites</u>	17A, 18		SA6	LPA/developers/business owners	<u>No new employment floorspace approved annually</u>	Consider barriers to implementation. Review evidence and consider review	Splitting the indicator into two: one to cover safeguarding and one to cover delivery of new employment opportunities is more meaningful.
148	Number of planning permissions for major residential applications that include Major residential developments securing community facilities, sports facilities, playing pitches and public open space	<u>All major residential developments must meet criteria and standards set out in Policies 23, 24 and 28</u>	24	22, 23, 25, 28	SA3, SA4, SA5	Developers / LPA	<u>>20% of permissions failing to meet standards</u> <u>Permissions granted contrary to policy</u>	Identify barriers to implementation with developers. Consider evidence and potentially review policy. <u>Consider barriers to implementation.</u> <u>Further discussions with developers</u>	To ensure monitoring criteria are aligned with the purpose of the policy
149	Open Space contributions	Long-term funding for all new open spaces created	28	24	SA6, SA7, SA8	Developers; LPA	Unfunded open space	Re-negotiate with developers	Contingency can't be implemented

								for increased contribution	
150	Maintain high environmental health standards for new development	Objections from Environmental Health team	6	5	SA8, SA12, SA13	Developers / LPA	Design that creates immediate Environmental Health concerns	Consider barriers implementing designs that are satisfactory from an Environmental Health perspective.	The measure does not relate to a policy of this plan, therefore, should be deleted
151	Obesity levels	Lower level by 5% per year on year	6	20	SA8	PHE / NCC-WNC	Obesity levels increasing	Review strategy to do this	There is no justification for the 5%
151	Concentration of hot food takeways	No more than two adjacent A5 units within 400 metres of each other	20	6	SA8	LPA, Planning Policy	Appeals	Consider evidence and potentially review policy	No longer required. Policy 20 is recommended for deletion.
152	Supporting and safeguarding University of Northampton Waterside Campus	<u>Planning permissions granted for development that leads to</u> enhancements to already permitted scheme	10		SA6	University of Northampton/LPA	No permissions granted for delivery of enhancements within 5 years of adoption of plan	Identify barriers to delivery with developer such as viability issues	Provide clarity that the indicator relates to enhancements through the planning system
153	Sustaining and enhancing existing green <u>and blue</u> infrastructure and supporting the creation of new green <u>and blue</u> infrastructure	Housing developments of 15 or more dwellings <u>Major developments to</u> deliver or contribute to projects identified in Northampton Green Infrastructure Plan	27	28 and 29A and 29B	SA9	Developers / LPA / NCC	No new green <u>or blue</u> infrastructure projects delivered within 5 years of adoption of the LPP2	Consider barriers to implementation. Consider DM practices. Consider review of policy.	To reflect modification of policy 27 to include 'blue' infrastructure
154	Development on different types of open space <u>All new major developments to meet standards set out in Policy 28</u>	Development on land identified as surplus in the Open Space, sport and recreation study. <u>Maintaining the qualitative and quantitative standard of open space.</u>	27 28	28-27, 29A and 29B	SA10	LPA / planning policy	Development on land that has been identified as having a deficit of open space. <u>Approval granted where qualitative and quantitative standards are not met.</u>	Consider why this is happening with DM. Review evidence.	To better reflect objective of policy 28
154	Biodiversity net gain	Major <u>All</u> developments must offset and secure a net gain in biodiversity	29A	27, 29B	SA9	Developers/LPA	Loss of biodiversity <u>Any approval for development that does not</u>	Identify with developers and DM why net	To reflect modifications to policy 29A

							<u>result in a net gain in biodiversity</u>	increase in biodiversity is not achievable and consider viability.	
155	<u>Progress towards delivering sustainable schemes identified in Policy 34, and aligned to Policy 32</u> <u>Development meeting criteria set out in Policies 32 and 34.</u>	Delivery of sustainable schemes identified in Policy 34 and aligned to Policy 32 transport measures and schemes in accordance with Policies 32 and 34.	32, 34	2, 5	SA2, SA3, SA4	Developers / LPA / NCC	<u>No progress towards delivery of new schemes within 5 years of adoption of LPP2</u> <u>Approval granted for development that is not in accordance with Policy 32 and / or Policy 34</u>	Consider barriers to implementation. Consider review of CIL.	To better reflect objectives of Policies 32 and 34.
156	<u>Progress towards NCC's modal shift objectives as set out in Policy 32</u>	5% reduction in share of private car trips across existing developments, and 20% reduction from all new development	32	6	SA2, SA4, SA8	Developers / LPA	<u>Less than 5% and 20% reductions in modal shift being achieved</u>	<u>Travel to work surveys to understand why modal shift is not happening.</u> <u>Review Travel Plans and why they are not being implemented.</u> <u>Understand barriers such as suitable infrastructure / services to allow for modal shift</u>	Contingency can't be implemented
157	<u>Compliance with measures set out in Policy 5</u> <u>Development complies with Policy 5</u>	All units in major development will be required to demonstrate how they are increasing efficiency in line with policy 5 All applications for major development should include a sustainability statement demonstrating how they meet the criteria set out in Policy 5.	5	32	SA8, SA12, SA13, SA16	Developers / LPA (development management)	<u>Planning permission granted where compliance has not been demonstrated</u> <u>Low adoption of measures identified through granted major planning applications</u>	Identify barriers to delivery with developers and DM. Consider whether viability is an issue.	
158	Development is in accordance with Policy 7 (flood risk and water	No applications granted contrary to flood management documents	7		SA14	Developers / LPA (DM) / planning policy / EA	Permissions granted contrary to advice, <u>without</u>	Discussions with partner organisations,	To update monitoring criteria in line

	<u>management} manages flood risk</u>	<u>referenced in Policy 7 and associated criteria, unless there is reasoned justification and appropriate mitigation</u>					<u>reasoned justification and appropriate mitigation</u>	<u>developers and DM.</u> <u>Identify with developers what are the barriers to implementation</u>	with changes to Policy 7.
158	<u>Development ensures access to water supply and drainage infrastructure, includes SUDs and provides surface water attenuation to the design standard for the Upper Nene Catchment</u>	<u>All new development ensures access to water supply and drainage infrastructure, includes SUDs and provides surface water attenuation to the design standard for the Upper Nene Catchment, unless there is reasoned justification and appropriate mitigation</u>	7		SA14	Developers / LPA / EA	<u>Permissions granted contrary to policy, without reasoned justification and appropriate mitigation</u>	<u>Identify with developers what are the barriers to implementation</u>	To update monitoring criteria in line with changes to Policy 7.
158	<u>Increase in number of electric vehicle charging points</u> <u>All new dwellings in major residential development should include EVCPs in accordance with Policy 32</u>	<u>All new dwellings in residential major development should have EVCPs</u> <u>Increase in number of electric vehicle charging points</u>	<u>32</u> <u>35</u>	5	SA8, SA12	Developers / LPA / NCC (DM) / planning policy / EA	<u>No annual increase in EVCP installations</u> <u>Permissions granted contrary to policy</u>	<u>Discussions with partner organisations, developers and DM.</u> <u>Identify with developers what are the barriers to implementation</u>	To ensure this aspect of Policy is monitored appropriately
158	Parking standards	<u>To meet Northampton ear motor vehicle and cycle parking standards</u>	<u>35</u>	4	SA12	Developers / NCC / LPA	<u>Planning applications consents which exceed are not in accordance with ear motor vehicle parking standards and fail to provide suitable and safe cycle parking</u>	<u>Discussions with DM and developers to reduce occurrences</u> <u>Identify with developers what are the barriers to implementation</u>	To ensure this aspect of Policy is monitored appropriately
159	Provision of or contribution to infrastructure as set out in Policy 37	Major development should contribute towards infrastructure schemes in order to mitigate their development	<u>37</u>	6, 7, 23, 24, 25, 26, 27, 28, 30, 32, 33, 34, 36	SA2, SA3, SA8, SA12, SA13, SA16	Developers / LPA / NCC / S106 monitoring / CIL/Government grants	Non delivery of key transport schemes, green infrastructure, school places and other infrastructure required to mitigate development.	Identify with developers and partners blocks to infrastructure delivery. Consider if	To identify additional potential sources of funding

								viability is an issue.	
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APPENDIX 4 - Modifications to Appendix B – Superseded Policies

a. NORTHAMPTON LOCAL PLAN 1997

Saved Policy Number in Adopted Northampton Local Plan	Saved Policy Title in Adopted Northampton Local Plan	Replacement Policy Number in this Plan, as proposed to be modified	Replacement Policy title in this Plan, as proposed to be modified	Commentary
E7	Skyline development	2 /3	Placemaking /and Design	NLP policy title corrected. Policy number and title updated
E20	New development (design)	2 /3, 4	Placemaking /and Design; Amenity and Layout	Policy number and title updated. Reference to additional policy
E29	Shopping environment: new or replacement shop fronts	2/3	Placemaking /and Design	Policy number and title updated.
E30	Shop front: external security protection	2/3	Placemaking /and Design	Policy number and title updated.
E36	Advertisement hoardings: express consent	2/3	Placemaking and Design	
H10	Other housing development: backland development	2/3, 4, 14	Placemaking /and Design; Amenity and Layout; Type and mix of housing	Policy number and title updated. Reference to additional policies
H14	Residential development, open space and children's play area facilities	28	Providing Open Spaces	NLP policy title corrected.
H18	Extensions	2/3, 4	Placemaking /and Design; Amenity and Layout	Policy number and title updated.
H21	Conversion to flats	2/3, 4	Placemaking /and Design; Amenity and Layout	Policy number and title updated.
H23	Conversion to flats	2/3, 4	Placemaking /and Design; Amenity and Layout	Policy number and title updated.
H24	Conversion to flats	2/3, 4	Placemaking /and Design; Amenity and Layout	Policy number and title updated.
H31	Cumulative effect	2	Placemaking and Design	To correct an omission
B7	Brackmills: height considerations	2/3	Placemaking /and Design	Policy number and title updated.
B9	Pineham and Milton Ham: landscaping zone	2/3	Placemaking /and Design	Policy number and title updated.
B11	Milton Ham: height considerations	2/3	Placemaking /and Design	Policy number and title updated.
B14	Development for non-business uses in business areas	2/3	Placemaking /and Design	Policy number and title updated.
B20	Working from home	2/3	Placemaking /and Design	Policy number and title updated.

B31	Environmental impact business development: new locality	2/3	Placemaking /and Design	Policy number and title updated.
B32	Environmental impact of business development: amelioration	2/3	Placemaking /and Design	Policy number and title updated.
B33	Environmental impact of business development: hazardous development	2/3	Placemaking /and Design	Policy number and title updated.
T12	Development requiring servicing	2/3, 4	Placemaking /and Design /; Amenity and Layout	Policy number and title updated.
T22	Provision for people with a disability	2/3, 4	Placemaking /and Design /; Amenity and Layout	NLP policy title corrected. Policy number and title updated.
R5	-Town centre: change of use			Replaced by CAAP
R6	-Town centre: primary shopping frontages			Replaced by CAAP
R7	-Town centre: secondary frontages			Replaced by CAAP
R15	Car showrooms	2/3, 4	Placemaking /and Design /; Amenity and Layout	Policy number and title updated.
D4	Crow Lane (north): business or leisure	17A	Not suitable for Employment allocations	The site was incorrectly referred to as not being suitable for allocation. The site has been allocated for employment in this Plan
D22	-Angel Street/ Bridge Street: retail or office		Not required—built	Replaced by CAAP
D23	-Castle Yard, St Andrew's Road: residential or business, safeguard future position of north west bypass	38	Development Allocations	Replaced by CAAP
D26	Freeschool Street: high density residential or residential and office with retail on frontage to Marefair	38 / 44	Development Allocations / Sites in Tanner Street, Green Street, St Peter's Way and Freeschool Street (LAA0167 / 0818 / 0931 + 1010)	Replaced by CAAP
D27	Lower Mounts: car park and leisure/ residential	38-	Development Allocations	Replaced by CAAP
D28	-St Andrew's Street: residential and retail	-	Not required—various changes have taken place within the area	Replaced by CAAP
D29	-St John's car park: residential, leisure and parking	-	Not required—part of the site has been developed	Replaced by CAAP
D30	British gas land, St Peter's Way: mix of leisure, retail and employment with a minor element of housing	-	Not required—site developed	Replaced by CAAP
D31	-Victoria Street car park: office and car parking	38	Development Allocations	Replaced by CAAP
D32	-Western island, Lady's Lane	38	Development Allocations	Replaced by CAAP
D33	-Wellington Street: office and retail	-	Not required. Not allocated in the Central Area Action Plan	Replaced by CAAP
D35	-York Road: business or residential	-	Not required. Not allocated in the Central Area Action Plan	Replaced by CAAP

b. CENTRAL AREA ACTION PLAN 2013

Saved Policy Number in Central Area Action Plan	Saved Policy Title in Central Area Action Plan	Replacement Policy Number in this Plan, as proposed to be modified	Replacement Policy title in this Plan, as proposed to be modified	Commentary
1	Promoting design excellence	2 /3, 4	Placemaking /and Design; Amenity and Layout	Policy number and title updated
2	Tall buildings	2 /3, 4	Placemaking /and Design; Amenity and Layout	Policy number and title updated.
3	Public realm	2 /3, 4	Placemaking /and Design; Amenity and Layout	Policy number and title updated.
15	Office and business use	17 / <u>17A</u> , 18	Safeguarding Existing Employment Sites; <u>Employment Allocations</u> ; Supporting New Employment Developments and Employment Schemes Outside Safeguarded Sites	Updated to include new Policy 17A.
17	Grosvenor Centre redevelopment	<u>13, 17A, 38</u> / 42	Residential and Other Residential Led Allocation <u>Employment Development</u> Allocations; Greyfriars	Updated to include new Policy 17A (Victoria Street Car Park allocation) and delete reference to Policy 38.
19	Castle Station	<u>13, 39</u>	Policy Implemented Residential and Other Residential Led Allocation Northampton Railway Station (LAA0288), Railfreight and Adjoining Sites (LAA0333)	Housing element of previous policy as it applies to LAA0288 superseded in new policy.
23	Upper Mounts / Great Russell Street <i>Checking if housing element has been completed and, if so, delete</i>	<u>3813</u>	Development Allocations Residential and Other Residential Led Allocation	Updated as a result of changes to policy structure of Plan.
25	The Waterside	<u>382</u>	Development Allocations Placemaking and Design	Correction
26	The Waterside: Brampton Branch St Peter's Way	<u>38 17A</u>	Development Employment Allocations	Updated Policy reference.
27	The Waterside: Southbridge West	<u>38</u>	Mostly developed Remaining sites covered by Development Allocations.	
28	The Waterside: Avon / Nunn Mills / Ransome Road	<u>10, 13, 17, 43</u>	Policy implemented Supporting and Safeguarding the University of Northampton Waterside Campus; Residential and Other Residential Led Allocation; Safeguarding Existing Employment Sites; Ransome Road (LAA1139)	Correction

29	The Waterside: Becket's Park	<u>38</u> , <u>13</u> , <u>27</u> , <u>28</u>	<u>Development Allocations</u> <u>Residential and Other</u> <u>Residential Led Allocation;</u> Sustaining and Enhancing Existing, and Supporting the Creation of, Northampton's Green Infrastructure; Providing Open Spaces	Policy number and title updated. Correction.
33	Freeschool Street	<u>38</u> <u>13</u> , <u>44</u>	<u>Development Allocations</u> <u>Residential and Other</u> <u>Residential Led Allocation;</u> <u>Sites in Tanner Street,</u> <u>Green Street, St Peter's Way</u> <u>and Freeschool Street</u> <u>(LAA0167 / 0818 / 0931 /</u> <u>1010)</u>	Policy number and title updated. Correction.

Insert new section as follows:

c. WEST NORTHAMPTONSHIRE JOINT CORE STRATEGY 2014

Policy Number in West Northamptonshire Joint Core Strategy	Policy Title in West Northamptonshire Joint Core Strategy	Replacement Policy Number in this Plan	Replacement Policy title in this Plan
N2	Northampton Central Area	<u>12</u> <u>19</u>	Development of Main Town Centre Uses New Retail Developments and Retail Impact Assessment

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WEST NORTHAMPTONSHIRE COUNCIL

**NORTHAMPTON LOCAL PLAN PART 2
SUBMISSION PLAN**

**PROPOSED SCHEDULE OF ADDITIONAL
MODIFICATIONS
JUNE 2022**

NORTHAMPTON LOCAL PLAN PART 2
SUBMISSION
PROPOSED SCHEDULE OF ADDITIONAL MODIFICATIONS

Reference	Paragraph Number	Proposed Additional Modification Word to be deleted is struckthrough New wording is <u>underlined</u>	Reason for Change																
AMOD1		In the final version of the plan, every reference to Northampton Borough Council will be changed to West Northamptonshire Council (where necessary).	To reflect that Northampton Borough Council became a Unitary council on 1 April 2021 along with Daventry District, South Northamptonshire and Northamptonshire County Councils.																
AMOD2		<p>In the final version of the plan, the policy numbering system will be changed. The first policy in each section is shown for illustrative purposes below:</p> <table> <tbody> <tr> <td>Chapter 4 - Sustainable Development</td> <td>SD1</td> </tr> <tr> <td>Chapter 5 – Quality of New Development</td> <td>Q1</td> </tr> <tr> <td>Chapter 6 – Northampton Regeneration Strategy</td> <td>RS1</td> </tr> <tr> <td>Chapter 7 – Residential</td> <td>HO1</td> </tr> <tr> <td>Chapter 8 – Economy</td> <td>EC1</td> </tr> <tr> <td>Chapter 9 – Hierarchy of Centres, Retail, and Community Services</td> <td>CRC1</td> </tr> <tr> <td>Chapter 10 – Built and Natural Environment</td> <td>ENV1</td> </tr> <tr> <td>Chapter 11 – Movement</td> <td>MO1</td> </tr> </tbody> </table>	Chapter 4 - Sustainable Development	SD1	Chapter 5 – Quality of New Development	Q1	Chapter 6 – Northampton Regeneration Strategy	RS1	Chapter 7 – Residential	HO1	Chapter 8 – Economy	EC1	Chapter 9 – Hierarchy of Centres, Retail, and Community Services	CRC1	Chapter 10 – Built and Natural Environment	ENV1	Chapter 11 – Movement	MO1	
Chapter 4 - Sustainable Development	SD1																		
Chapter 5 – Quality of New Development	Q1																		
Chapter 6 – Northampton Regeneration Strategy	RS1																		
Chapter 7 – Residential	HO1																		
Chapter 8 – Economy	EC1																		
Chapter 9 – Hierarchy of Centres, Retail, and Community Services	CRC1																		
Chapter 10 – Built and Natural Environment	ENV1																		
Chapter 11 – Movement	MO1																		

		<p>Chapter 12 – Infrastructure</p> <p>Chapter 13 – Site Specific Allocations and Policies</p> <p>As these changes are presentational only, they do not formally form part of these modifications.</p>	IFS1 A1	
AMOD3	2.40	<p>Amend to read as follows:</p> <p>There are currently 7 Air Quality Management Areas (<u>AQMA</u>s) in <u>Northampton</u> (see <u>Figure 8</u>). These are areas which exceed the Government's air quality objective and where there is relevant exposure to the public. A consultation is presently underway <u>It is the intention to amalgamate all the central AQMAs into one large AQMA covering the town centre to promote consistency in applying the LES. The proposed Town Centre AQMA is shown in Figure 8.</u></p>	To correct a factual error.	
AMOD4	Figure 8	<p>Amend the title of Figure 8 as follows:</p> <p>Figure 8: <u>Proposed Town Centre</u> Air Quality Management Areas</p>	To correct a factual error.	
AMOD5	Policy 1	<p>3rd paragraph:</p> <p>....then <u>Northampton Borough</u> <u>the</u> Council.....</p>	Northampton Borough Council no longer exists.	
AMOD6	5.31	<p>Amend to read as follows:</p> <p><u>The Environment Agency has an overview of flooding from all sources and is the lead on flooding from main rivers, reservoirs and the sea. West Northamptonshire County Council (NCC WNC) is the lead local flood authority (LLFA) and is responsible for the coordination and management of flood risk from surface water and ground water.</u> Since the adoption of the West Northamptonshire</p>	To reflect consultation responses made by Anglian Water and to reflect comments made by the Environment Agency in their Written Statement.	

		Core Strategy, two further documents have been introduced to assist in the reduction of flood risk. The Environment Agency is responsible for flood risk management activities on main rivers across Northamptonshire. The Northamptonshire Flood Toolkit provides details on the relevant agencies and their responsibilities.	
AMOD7	After 8.17	Update Table 10 as set out in Appendix 1.	To provide a factual update by including data for 2019.
AMOD8	Footnote 55	Planning the future of open space, sport and recreation in West Northamptonshire – Part 2 <u>3</u> Playing Pitch Strategy....	To correct a factual error
AMOD9	9.26	Last sentence: ...the term 'playing pitches' covers football, cricket, rugby <u>union</u> , hockey...	To clarify the text.

Appendix 1

Update table 10 to include information for 2019:

Table 10: Net job changes in West Northamptonshire

	Daventry	Northampton	South Northamptonshire	West Northamptonshire
2008	38,500	125,000	29,000	192,500
2009	35,000	120,500	28,500	184,000
2010	34,500	122,500	28,500	185,500
2011	35,500	122,500	28,500	186,500
2012	34,000	121,500	28,500	184,000
2013	35,500	123,000	29,000	187,500

2014	35,500	125,000	31,000	191,500
2015	38,000	124,000	33,000	195,000
2016	40,500	128,000	33,000	201,500
2017	42,000	136,500	34,500	213,000
2018	43,000	135,500	36,500	215,000
<u>2019</u>	<u>42,500</u>	<u>134,500</u>	<u>35,000</u>	<u>212,000</u>
Change 2008 - <u>2019</u>	+4,000	+9,500	+6,000	+19,500

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WEST NORTHAMPTONSHIRE COUNCIL

**NORTHAMPTON LOCAL PLAN PART 2
SUBMISSION PLAN**

**PROPOSED SCHEDULE OF CHANGES TO THE POLICIES MAP
JUNE 2022**

**NORTHAMPTON LOCAL PLAN PART 2
SUBMISSION**
PROPOSED SCHEDULE OF CHANGES TO THE POLICIES MAP

REF	SITE	PROPOSED CHANGES	REASON FOR CHANGE
PM1	LAA0171 Quinton Road	Amendment to site boundary to remove area within Flood Zone 3A and B. Shown in Plan 1B.	To address the Environment Agency's concerns regarding flooding
PM2	LAA0195: Hunsbury School, Hunsbury Hill	Remove allocation	Housing on this site has been completed.
PM3	LAA0204: The Farm, Hardingstone	Remove area of land from southernmost corner of the allocation (0.16ha approximately) as shown in plan 2B below.	To reflect matter raised in Habitats Regulations Assessment and Inspectors' Initial Letter (EXAM 1).
PM4	LAA0205: Parklands Middle School, Devon Way	Remove allocation	Housing on this site is under construction.
PM5	LAA0328: Cattle Market Road	Delete allocation notation from this site (Policy 38) and replace with 'safeguarding' notation (Policy 17)	This is an existing employment site and was identified as an allocation in error.
PM6	LAA0336: Site rear of Aldi, former Chronicle and Echo	Remove allocation.	Housing on this site was completed prior to 1 st April 2021.
PM7	LAA0403: Allotments Studland Road	Remove allocation as shown in Plan 3.	Site to be retained as allotments.

PM8	LAA0615: Crow Lane	Change notation from brown to purple.	The allocation was incorrectly coloured brown which is for residential. It should be purple, which is the colour for employment allocation
PM9	LAA0657: Fraser Road	Remove allocation as shown in Plan 4.	Site to be retained as amenity green space.
PM10	LAA0685: Adj 12 Pennycress Place, Ecton Brook Road	Remove allocation as shown in Plan 5.	Site to be retained as amenity green space.
PM11	LAA1005: Martins Yard	The current allocation (as shown in Plan 6A) does not show the area where employment can developed. The revised plan shows where the employment part of the allocation is, for clarity, to distinguish it from the remaining area which is allocated for ecological enhancement (Plan 6B)	To clarify the policy position in relation to the developable area for employment within the allocation.
PM12	LAA1037: Swale Drive Garage Site	Remove allocation.	Housing on this site was completed prior to 1 st April 2021.
PM13	LAA1027	Remove lettering/numbering	Included in error
PM14	LAA1041: Newnham Road Kingsthorpe	Remove allocation as shown in Plan 7.	Site to be retained as amenity green space.
PM15	LAA1051a: Land Between Waterpump Court and Billing Brook Road	Remove allocation.	Housing on this site was completed prior to 1 st April 2021.
PM16	LAA1058: Land off Oat Hill Drive, Ecton Brook	Remove allocation as shown in Plan 8.	Site to be retained as amenity green space.

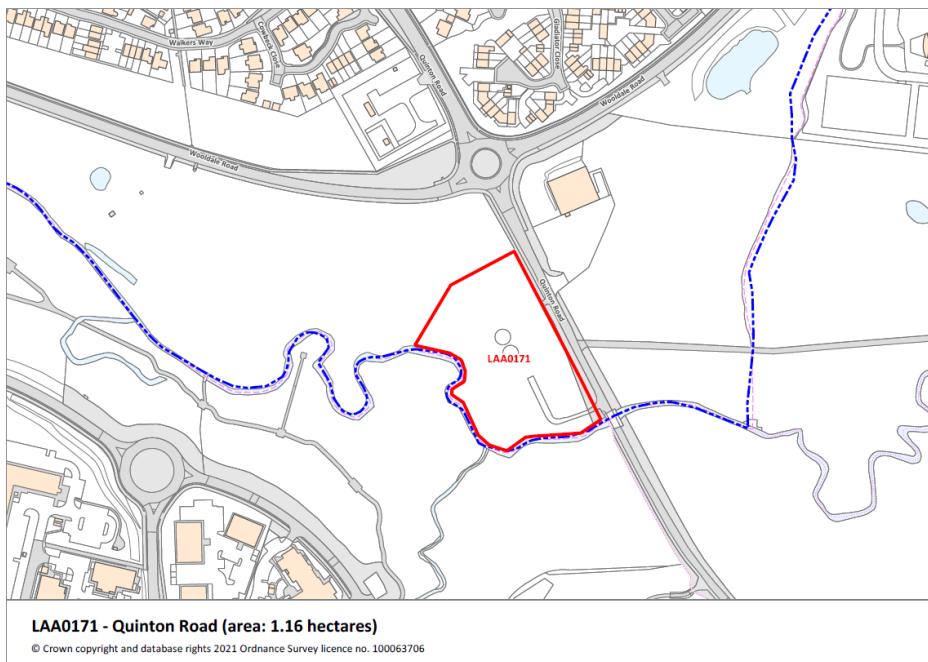
PM17	LAA1060: Hayeswood Road, Lings	Remove allocation.	Housing on this site is under construction.
PM18	LAA1094: Land off Holme cross Road	Remove allocation as shown in Plan 9.	Site to be retained as amenity green space.
PM19	LAA1097: Gate Lodge	Remove allocation as shown in Plan 10.	Site to be retained as amenity green space.
PM20	LAA1098: The Green, Great Houghton	Amend allocation to include Hardingstone Lodge as shown in Plan 11B below	To reflect amendment to extent of allocation.
PM21	LAA 1099: Upton Reserve Site	Remove allocation	Site is liable to flooding.
PM22	LAA1100: Hill Farm Rise	Identify as site specific policy and amend site allocation boundary to exclude areas required for railway operational purposes (see Plan 12B)	To ensure that operational railway requirements can continue to be accommodated on land adjacent to the revised allocation
PM23	LAA1107 Abington Mill Farm	Identify as site specific policy	To ensure the site can be safely accessed avoiding flood risk.
PM24	LAA1113: Greyfriars	Remove allocation as shown in Plan 13A. Replace with allocation shown in Plan 13B.	Part of site to be retained as amenity green space.
PM25	LAA1121 Upton Valley Way East	Remove allocation.	Housing on this site is under construction.
PM26	LAA1127: Connaught Road	Remove allocation.	Included in error.

PM27	LAA1138: Bedford Road	Remove allocation.	Allocation does not comply with sequential test.
PM28	New site: LAA1144	Identify new site LAA1144 which merges LAA0168, LAA1109 and LAA1142 into one allocation. Remove the references to these three sites and replace with a new reference LAA1144 – see Plan 14.	To reflect consultation response. The three sites can be merged because they are owned by landowners who are able to work together towards their delivery.
PM29	Additional LGS designation	Include Welland Valley FC (off Ladybridge Drive) as an Amenity Green Space designation (see Plan 15).	To reflect consultation responses from Parish Councils and to update the plan
PM30	Addition to map	Include the Northampton Railway Station to Brackmills route (Plan 16) as a route may be investigated for future transport use in a local plan review (Policy 34)	To reflect consultation response and to clarify the policy position on key transport routes and to align with the proposed Main modification to Policy 34
PM31	Residential Notation	Remove residential notation on site south of Wellingborough Road and replace with Local Centre notation	Included in error.
PM32	Safeguarded employment notation	Remove the existing nightclub from the safeguarded employment notation in Angel Street as shown on Plan 17B	Nightclub was included in error
PM33	Key	<p>Key to Policies Map:</p> <p>Central Area Boundary POLICYIES 9 and 12</p> <p>Employment Allocation Sites POLICY 18 Policy 17a</p> <p>Residential Allocation Sites POLICYIES 13 and 38</p> <p>Residential or Education POLICIES 13 and 38</p> <p>Local Wildlife Sites POLICIES 26, 29A and 29B</p> <p>Local Nature Reserves POLICY 29 29A AND 29B</p> <p>Upper Nene Valley Gravel Pits Special Protection Area, Ramsar POLICIES 29 29A AND 29B & 30</p> <p>SPA, Ramsar Bird Sightline Protection Zone POLICIES 29 29A AND 29B & 30</p> <p>SPA, Ramsar 3km Zone POLICIES 29 29A, 29B & 30</p> <p>Site Specific Policy: add <u>LAA1100 (Policy 45)</u> and <u>LAA1107 (Policy 46)</u></p>	<p>12 is no longer relevant due to MM10</p> <p>Included in error</p> <p>38 is no longer relevant due to MM37</p> <p>Site is no longer need for education</p> <p>Policy 26 not relevant to Local Wildlife Sites (included in error)</p> <p>Policy 29 has been split into two parts MM28 LAA1100 and LAA1107 have been added to the site-specific policy section</p> <p>12 is no longer relevant due to MM10</p> <p>Included in error</p>

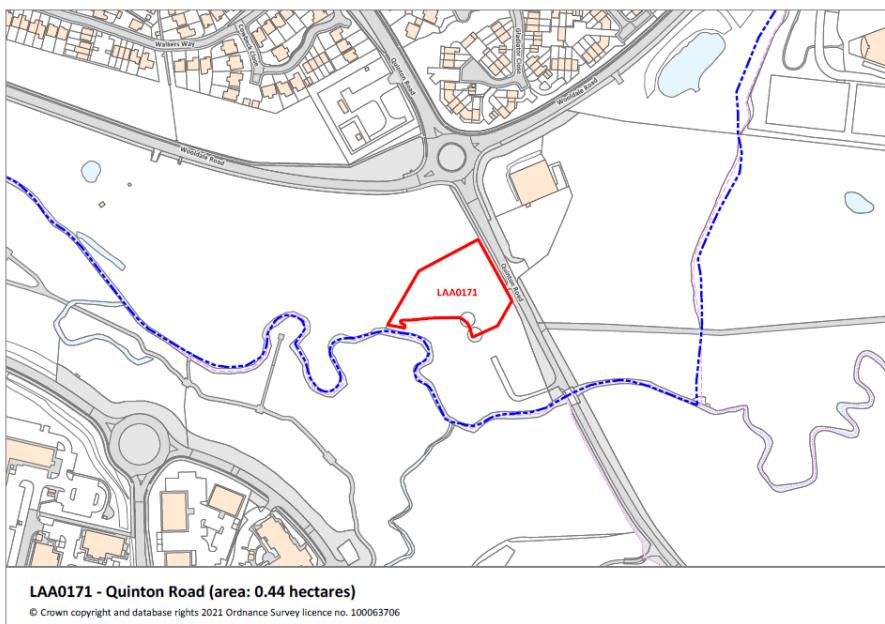
		<p>Key to Central Area Inset Map:</p> <p>Central Area Boundary POLICYIES 9 and 12</p> <p>Employment Allocation Sites POLICY 18 Policy 17a</p> <p>Residential Allocation Sites POLICYIES 13 and 38</p> <p>Local Wildlife Sites POLICIES 26, 29A and 29B</p> <p><u>Local Nature Reserves</u> POLICIES 29A and 29B</p> <p>SPA, Ramsar 3km Zone POLICIES 29 29A, 29B & 30</p> <p>Site Specific Policy: add <u>LAA1100 (Policy 45)</u> and <u>LAA1107 (Policy 46)</u></p>	<p>38 is no longer relevant due to MM37</p> <p>Policy 29 has been split into two parts MM28</p> <p>This was missed, in error</p> <p>LAA1100 and LAA1107 have been added to the site specific policy section</p>																
PM34	Key	<p>Key to Policies Map:</p> <p>New notation for Policy 17A. The following sites were previously allocated as development sites in Policy 38. These have now been allocated as employment sites in Policy 17A. The sites are:</p> <table border="1"> <thead> <tr> <th>Reference</th><th>Address</th></tr> </thead> <tbody> <tr> <td>LAA0167</td><td>Tanner Street</td></tr> <tr> <td>LAA0594</td><td>Sixfields East</td></tr> <tr> <td>LAA0598</td><td>Car Park, Victoria Street</td></tr> <tr> <td>LAA0615</td><td>Crow Lane</td></tr> <tr> <td>LAA0818</td><td>St Peters Way</td></tr> <tr> <td>LAA0870</td><td>Sixfields, Upton Way</td></tr> <tr> <td>LAA0931</td><td>Sites in Green Street</td></tr> </tbody> </table>	Reference	Address	LAA0167	Tanner Street	LAA0594	Sixfields East	LAA0598	Car Park, Victoria Street	LAA0615	Crow Lane	LAA0818	St Peters Way	LAA0870	Sixfields, Upton Way	LAA0931	Sites in Green Street	<p>Policy 38 has been recommended for deletion in the Proposed Main Modifications (MM37). Instead, the sites included in the submitted Policy 38 have been split into two: housing and employment. Allocated housing sites have already been included in Policy 13. The allocated employment sites are listed in new Policy 17A (MM17). The Policies Map will alter the notation for all employment allocated sites from Policy 38 to the new Policy 17A.</p>
Reference	Address																		
LAA0167	Tanner Street																		
LAA0594	Sixfields East																		
LAA0598	Car Park, Victoria Street																		
LAA0615	Crow Lane																		
LAA0818	St Peters Way																		
LAA0870	Sixfields, Upton Way																		
LAA0931	Sites in Green Street																		

		LAA1005	North of Martins Yard		
		LAA1101	Land at Waterside Way		
		LAA1112	Milton Ham		
PM35	Key	Key to Policies Map: Policy 18 – remove notation.			Policy 18 has been modified to address windfall sites (MM18). As such, this notation is no longer required.
PM36	Policies Map and Key	Policies Map: Add a new notation to LAA1100 (see PM22) – the notation should reflect the operational rail requirement only. Key: To show the notation for the operational rail requirement for site LAA1100 (hatched diagonally as shown below)			To demonstrate clearly where the operational requirements are.
		 <p>The map displays a residential area with several green spaces. A specific area is outlined in red and labeled 'LAA1100 - Hill Farm Rise'. This area is also highlighted with a green hatched pattern, indicating it is a Local Wildlife Site. Within this red-outlined area, there is a blue hatched section representing 'Railway operational requirements'. The map includes a legend and a copyright notice at the bottom.</p> <p>Legend:</p> <ul style="list-style-type: none"> Red line: LAA1100 - Hill Farm Rise Green hatched area: Local Wildlife Site Blue hatched area: Railway operational requirements <p>Text at the bottom of the map:</p> <p>West Northamptonshire Council LAA1100 - Hill Farm Rise (area: 4.44 hectares) © Crown copyright and database rights 2021 Ordnance Survey licence no. 100063706</p>			

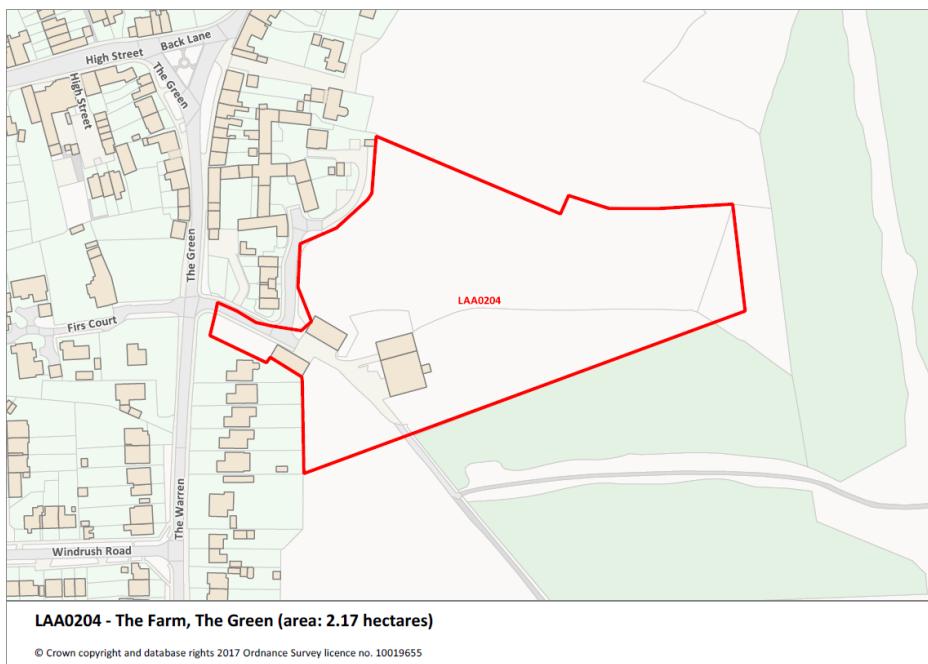
Plan 1A:
LAA0171 Quinton Road – Existing boundary



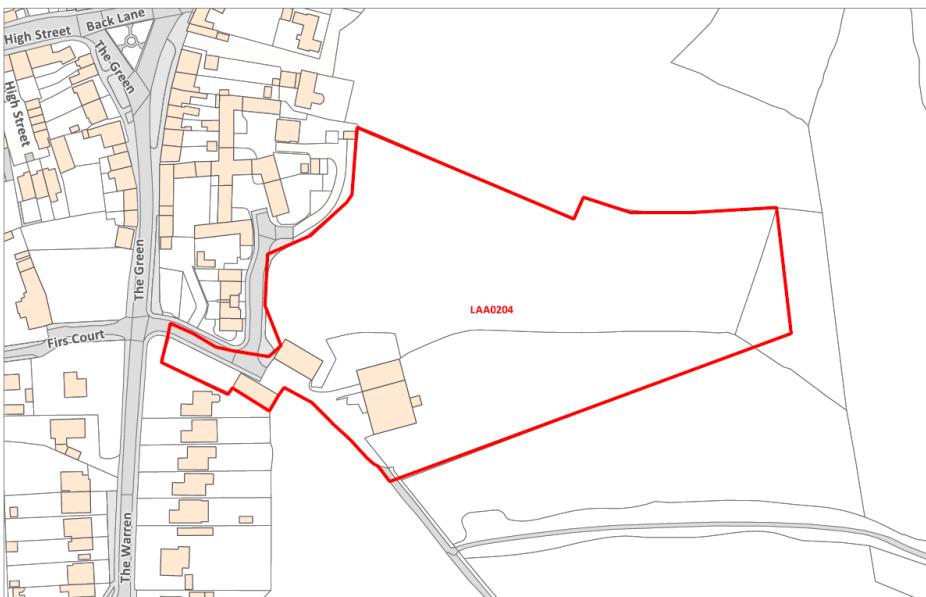
Plan 1B:
LAA0171 Quinton Road – Proposed Revised boundary



Plan 2A - LAA0204 The Farm, Hardingstone – Existing boundary



Plan 2B:
The Farm, Hardingstone - Proposed revised boundary



LAA0204 - The Farm, The Green (area: 2.01 hectares)

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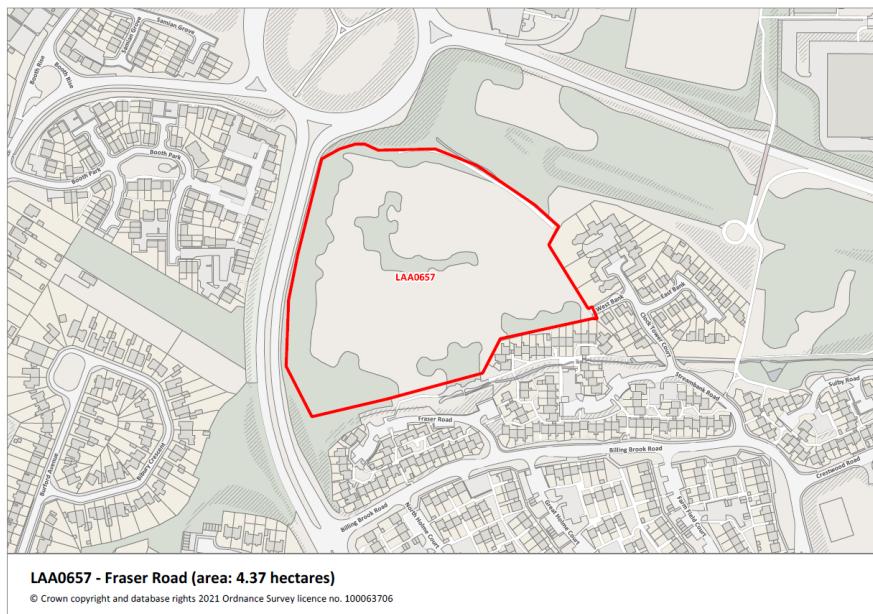
Plan 3:
LAA0403 Allotments Studland Road – allocation to be removed



LAA0403 - Allotments Studland Road (area: 0.72 hectares)

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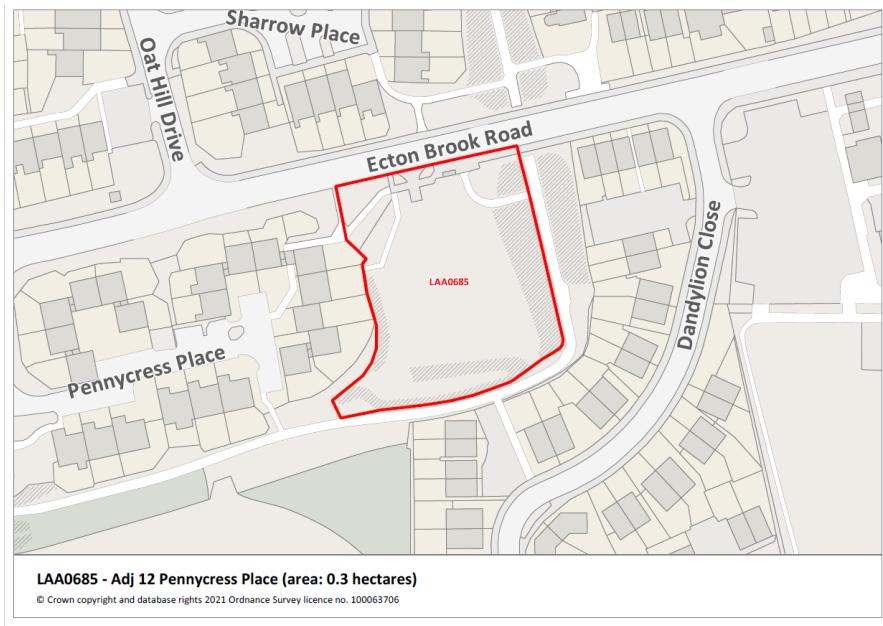
Plan 4:
LAA0657 Fraser Road – allocation to be removed



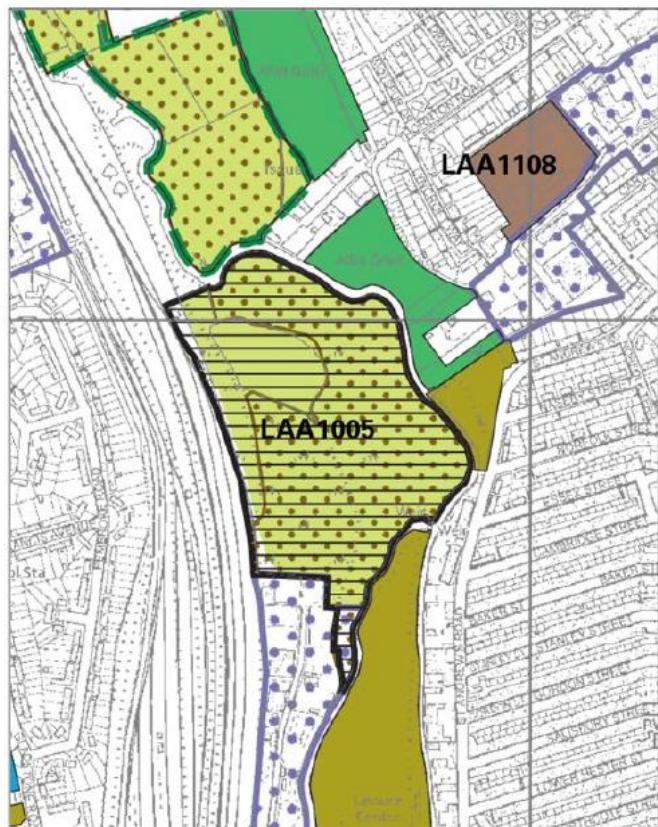
LAA0657 - Fraser Road (area: 4.37 hectares)

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Plan 5:
LAA0685 Adj 12 Pennycress Place, Ecton Brook Road –
allocation to be removed



Plan 6A
LAA1005 Martins Yard



	Title: Site 1005 - Policies map extract	Date: 30/10/2023
	© Crown Copyright 2023. Reproduced from Ordnance Survey data with the permission of the controller of Her Majesty's Stationery Office. Ordnance Survey is a registered trademark. Northampton Borough Council Licence Number 100004655.	Scale: NTS
		Drawn by: N.B

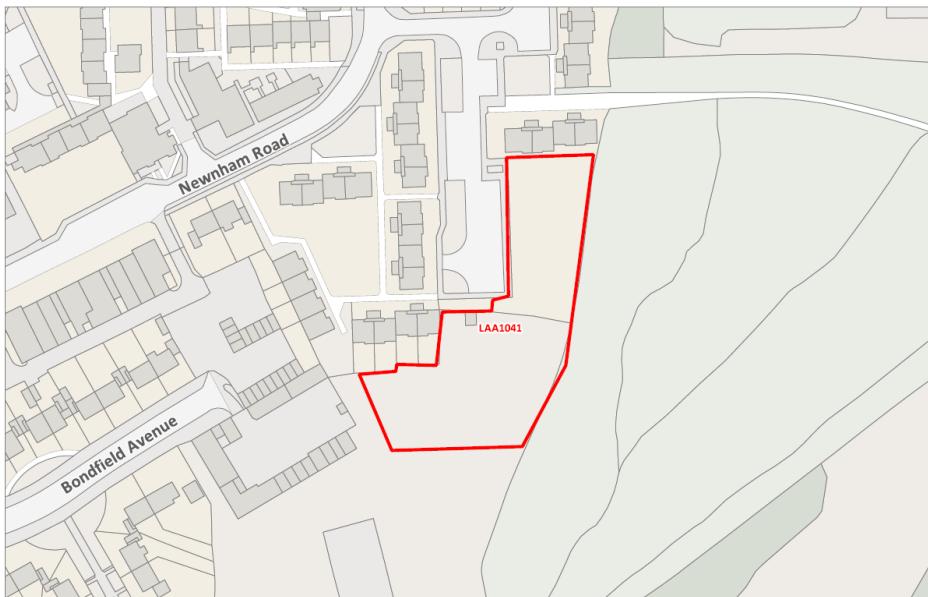
Plan 6B
LAA1005 Martins Yard



	Site 1005 - employment land	Date: 08/03/2008
© Crown Copyright 2008. Reproduced from Ordnance Survey data with the permission of the Controller of Her Majesty's Stationery Office. Ordnance Survey is a registered trademark. Northampton Borough Council Licence Number 08000002000.	Scale: 1:1250	Drafter: MJS

Plan 7

LAA1041 Newnham Road, Kingsthorpe – allocation to be removed

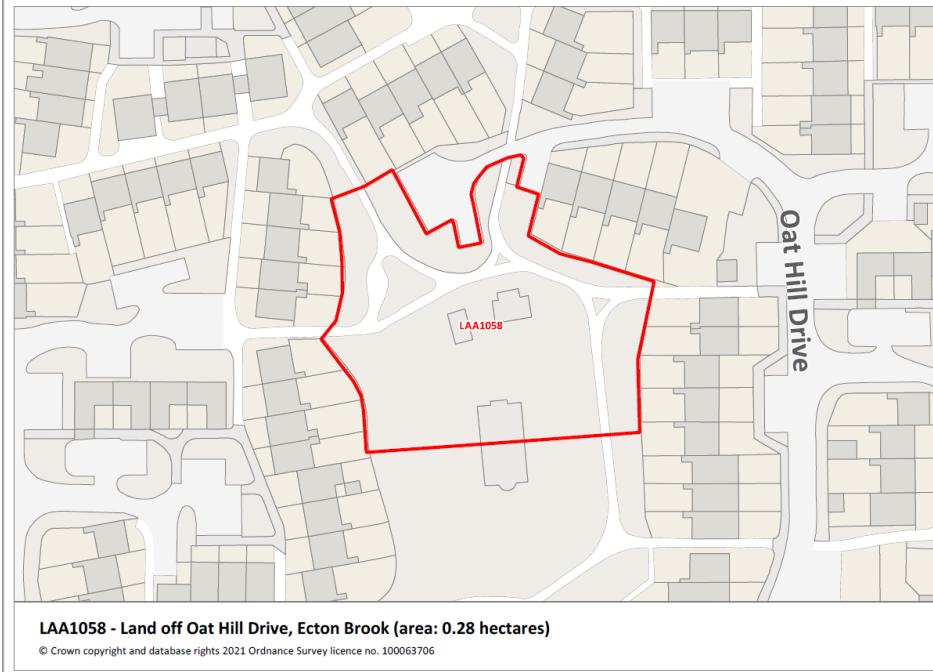


LAA1041 - Newnham Road (area: 0.37 hectares)

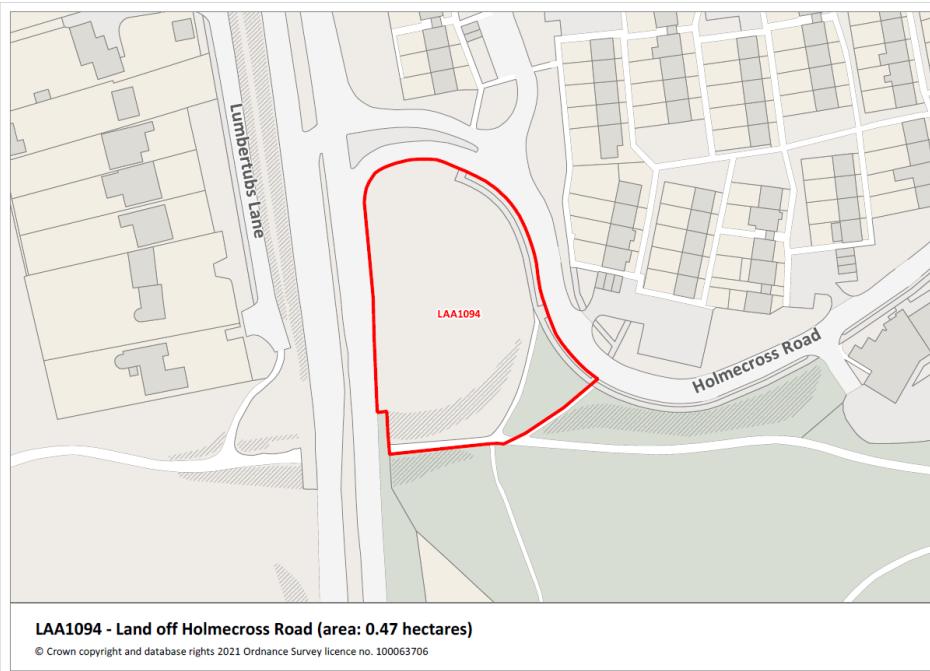
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Plan 8:

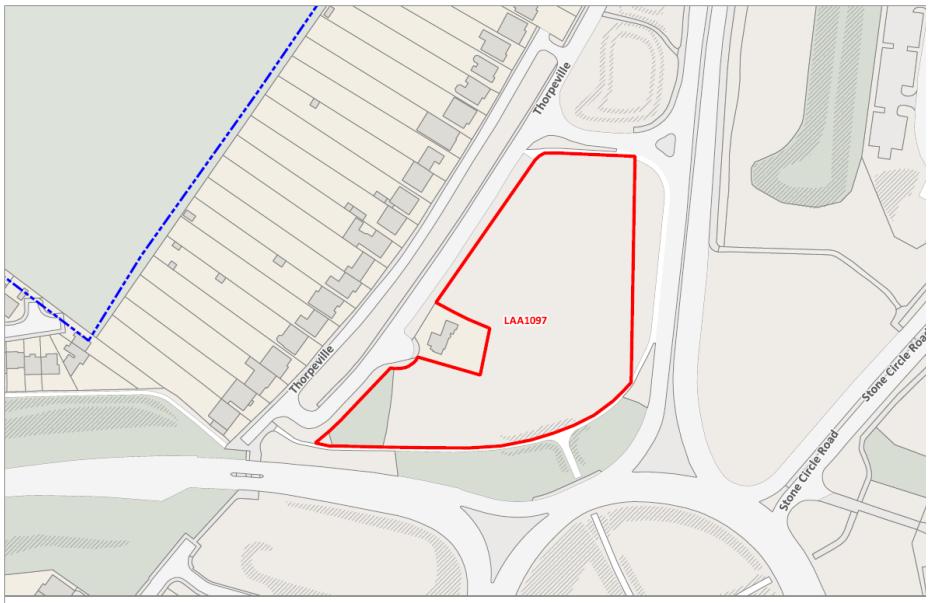
**LAA1058 Land off Oat Hill Drive, Ecton Brook – allocation to
be removed**



Plan 9:
LAA1094 Land off Holmecross Road – allocation to be removed



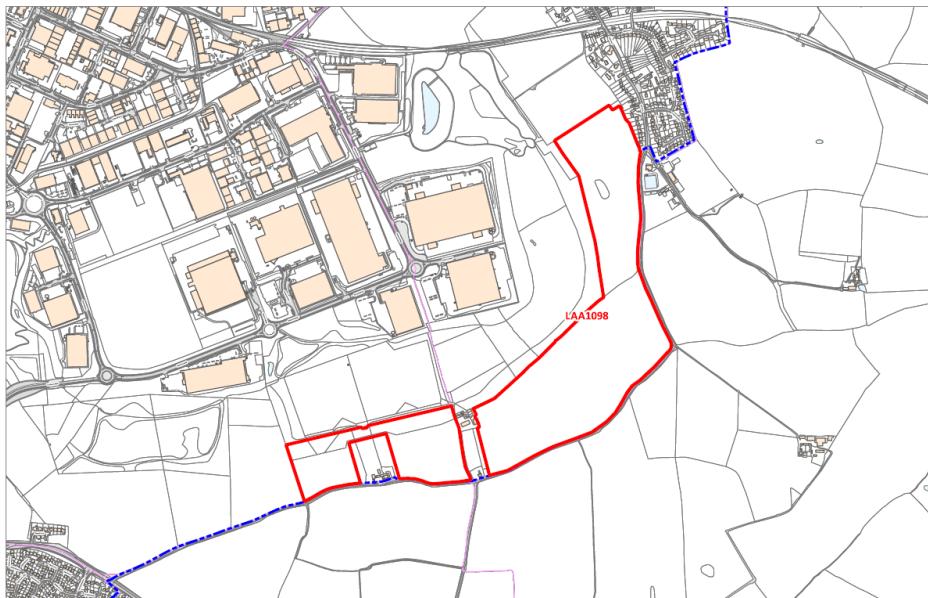
Plan 10:
LAA1097 Gate Lodge – allocation to be removed



LAA1097 - Gate Lodge (area: 1.11 hectares)

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Plan 11A:
LAA1098 The Green, Great Houghton – Existing boundary



LAA1098 - The Green, Great Houghton (area: 42.84 hectares)

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Plan 11B:
**LAA1098 The Green, Great Houghton – Proposed revised
boundary**



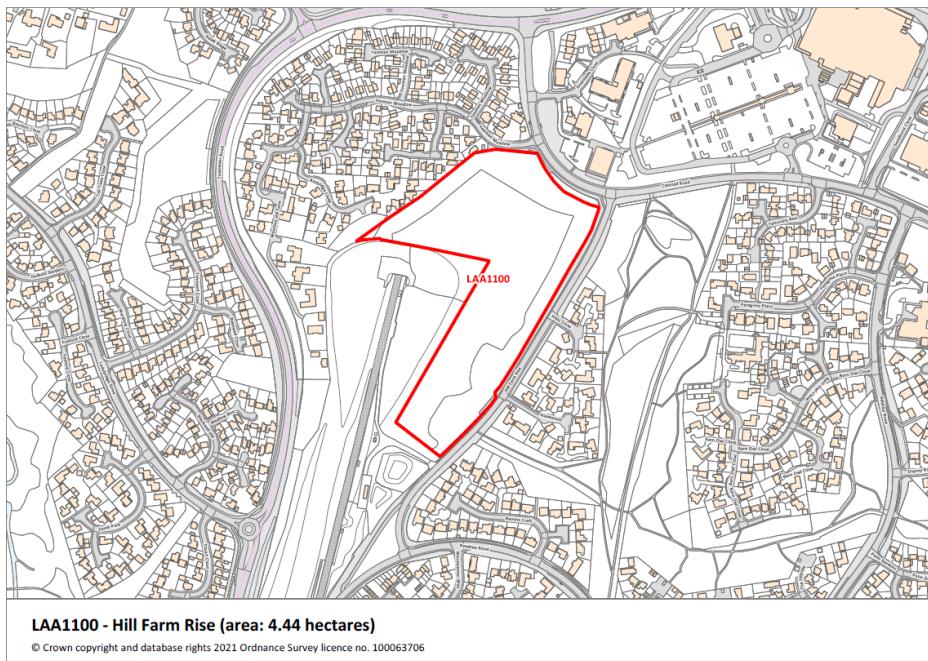
Plan 12A:
LAA1100 Hill Farm Rise, Hunsbury Hill – Existing boundary



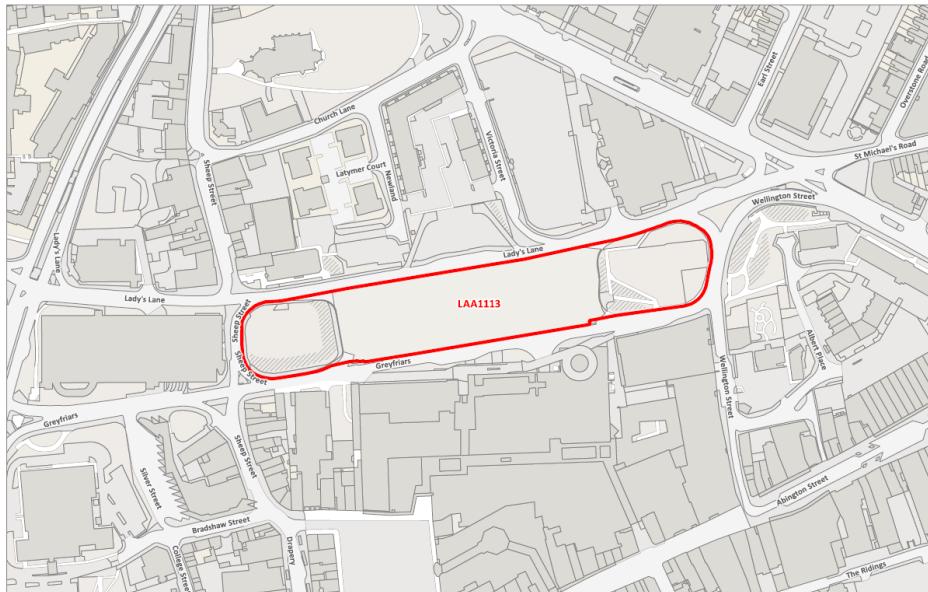
LAA1100 - Hill Farm Rise (area: 5.65 hectares)

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Plan 12B:
**LAA1100 Hill Farm Rise, Hunsbury Hill – Proposed revised
boundary**



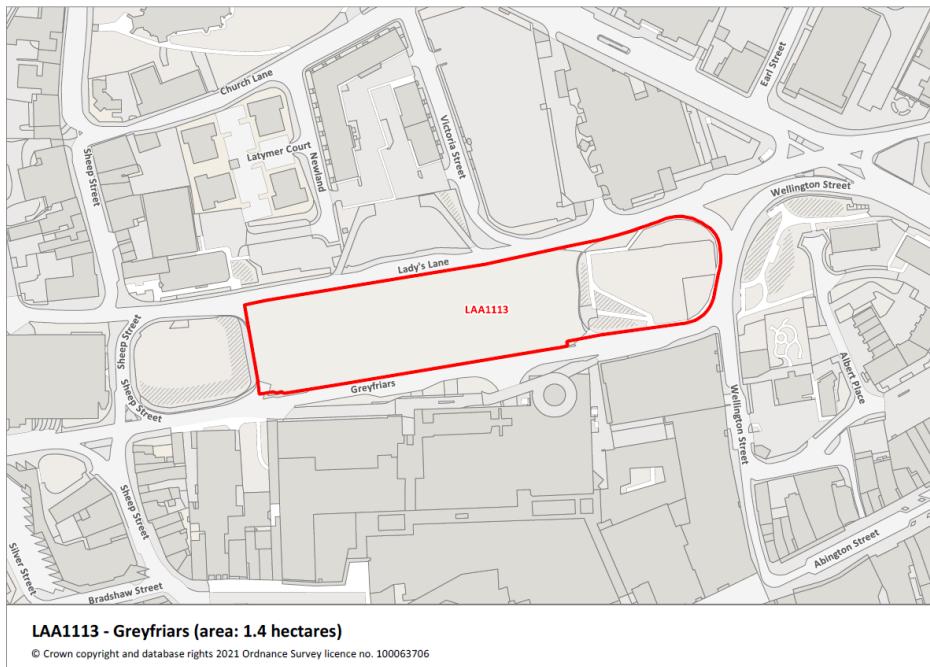
Plan 13A:
LAA1113 Greyfriars – Existing boundary



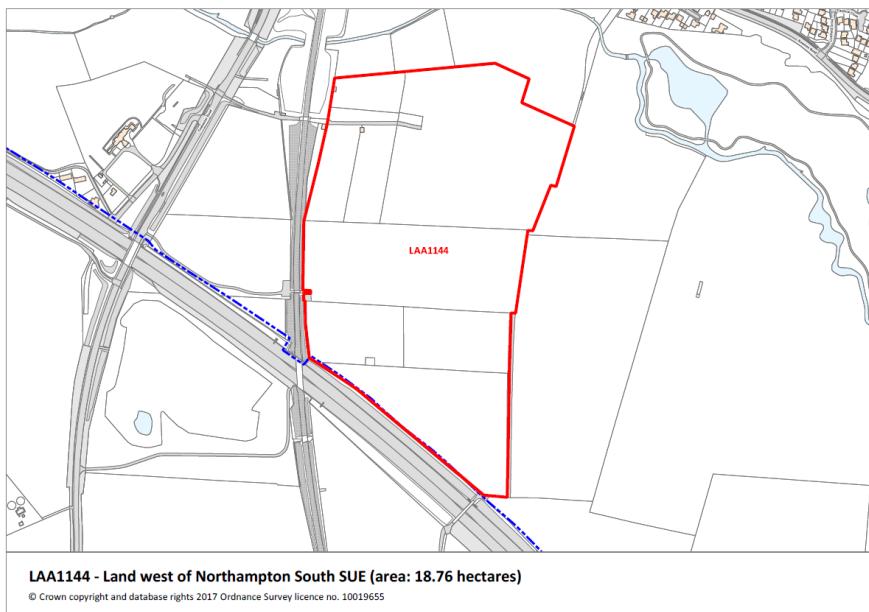
LAA1113 - Greyfriars (area: 1.75 hectares)

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Plan 13B:
LAA1113 Greyfriars – Proposed revised boundary

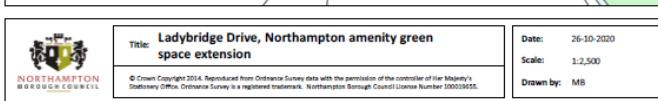
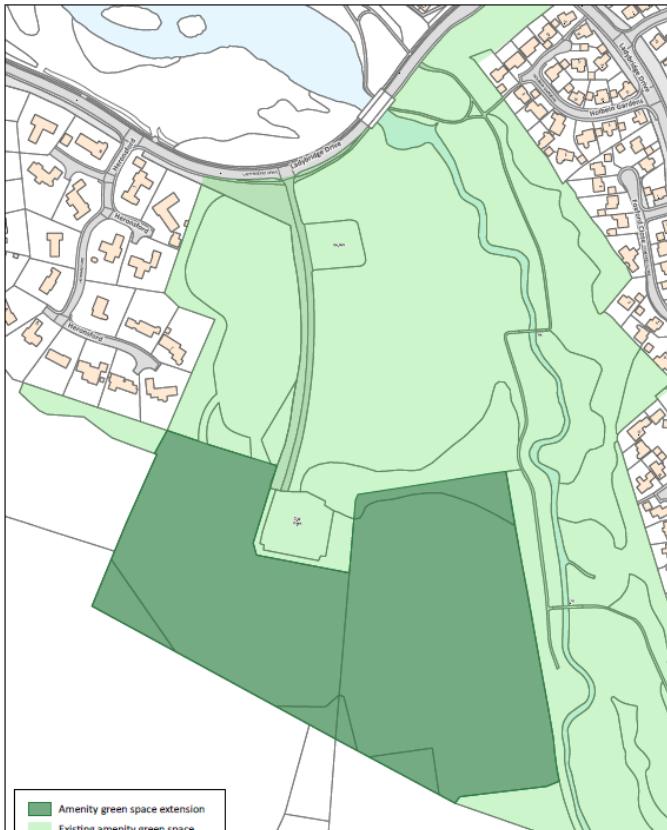


Plan 14:
Proposed merging of sites LAA0168, LAA1109 and LAA1142
and renaming as site LAA1144



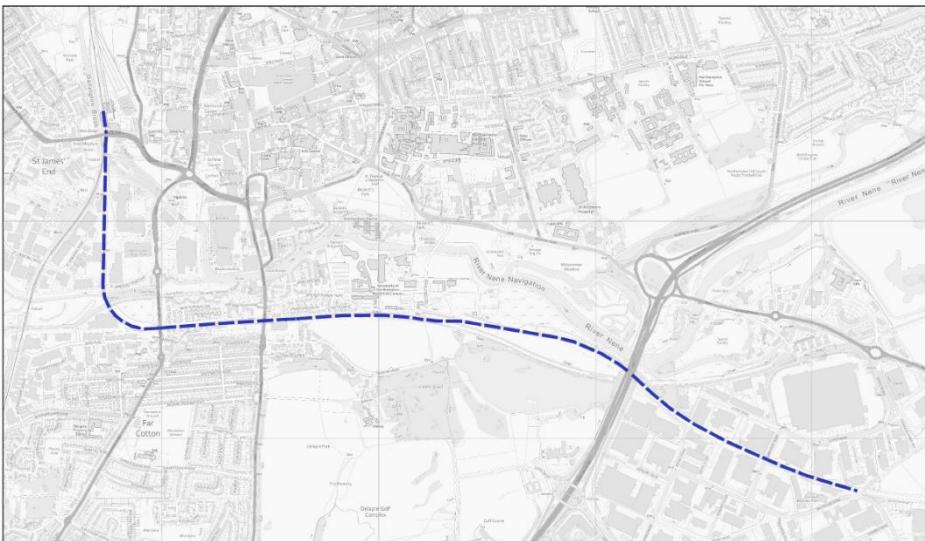
Plan 15

Proposed new amenity space designation (Shown in darker green) - not to scale



Plan 16:

Northampton station to Brackmills – indication that route may be investigated for future transport use in a local plan review – not to scale



Route of former Northampton to Brackmills railway line that may be investigated for future transport use in a local plan review

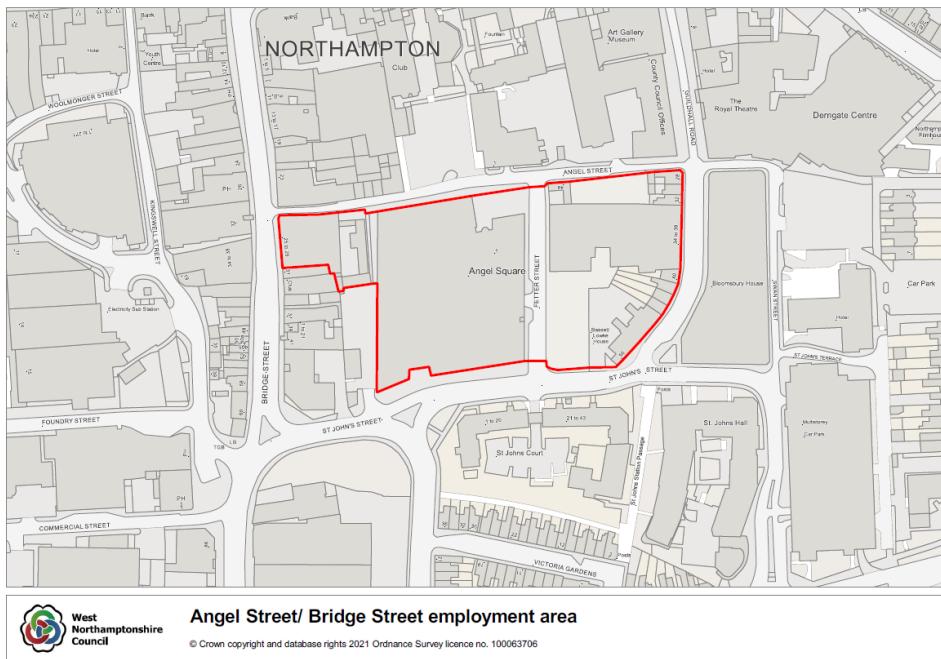


18 May 2022 - not to scale

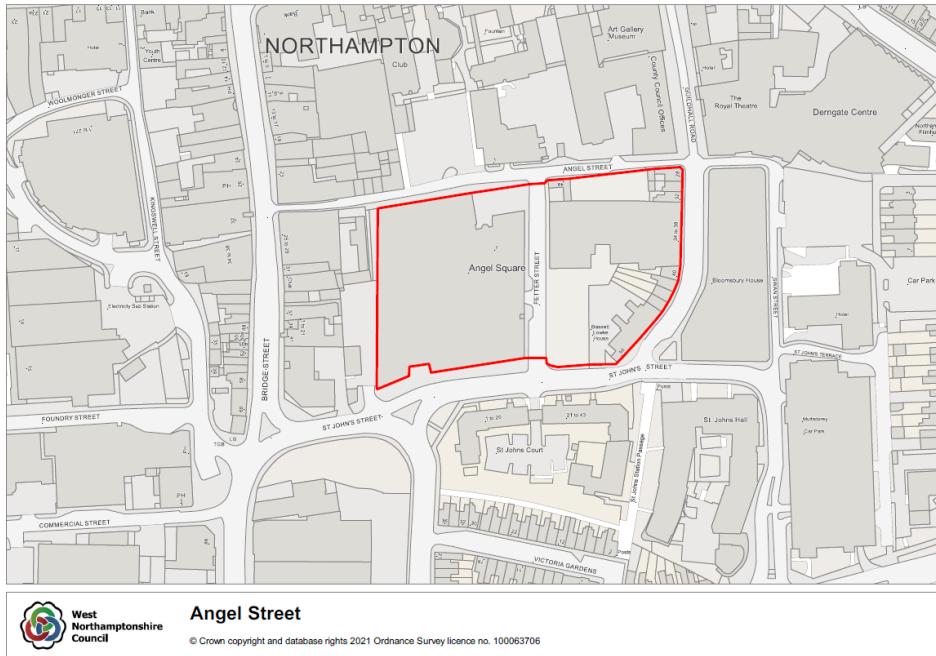
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Plan 17A:

Angel Street/ Bridge Street existing safeguarded employment area boundary



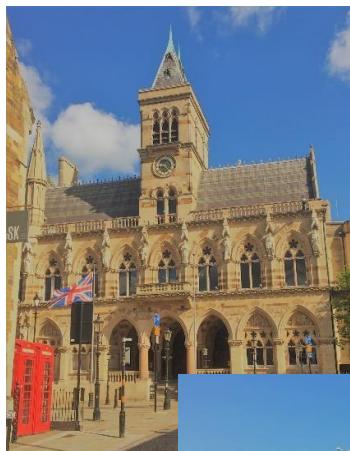
Plan 17B:
Angel Street (proposed revised safeguarded employment area boundary)



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**West
Northamptonshire
Council**



**Northampton Local Plan Part 2
2011 – 2029
~~Submission Version December 2020~~
Modifications Version JULY 2022**

CONSULTATION

PURPOSE OF THIS CONSULTATION

This consultation document is the second round of the proposed submission of the Northampton Local Plan Part 2. It contains details of the Council's proposed policies for determining planning applications and site specific allocations to guide developments within the Borough. These are the policies and proposals which the Council consider to be sound and will submit to the Planning Inspectorate for independent examination.

CONSULTATION ARRANGEMENTS

This consultation exercise accords with Northampton's Statement of Community Involvement (adopted in 2017 and modified in 2018). In undertaking this consultation, the Council has:

- Placed a Notice in the Northampton Chronicle & Echo
- Published a Press Release
- Contacted consultees on the local plan database including statutory consultees

Consultation documents include:

- The Proposed Submission Northampton Local Plan Part 2 (Round 2)
- Sustainability Appraisal of the Proposed Submission Local Plan Part 2
- Habitats Regulation Assessment

These consultation documents can be viewed online at www.northampton.gov.uk/lpp2proposedsubmissionround2 and at the following location:

a. Northampton Borough Council Offices

The Council's One Stop Shop (Self-Serve Area) at the Guildhall, St Giles Square, Northampton NN1 1DE (during office hours).

HOW TO COMMENT: The consultation period begins on 13 July 2020 and ends at 5pm on 24 August 2020.

A guidance note has been prepared to help you complete the representation form. Whilst you can comment on any part of the Plan or the Policies Map, you will need to state the paragraph number, table, figure and/ or Policy number.

You can respond in one of the following ways:

- Online using Survey Monkey
- By email download the representation form, completing it and emailing it to the Planning Policy Section (clearly marked "**Proposed Submission Consultation (Round 2)**" at: planningpolicy@northampton.gov.uk.)
- By post to Planning Policy (**Proposed Submission Consultation (Round 2)**), Northampton Borough Council, Planning Services, St Giles Square, Northampton NN1 1DE)

CONTENTS

MAIN DOCUMENT		
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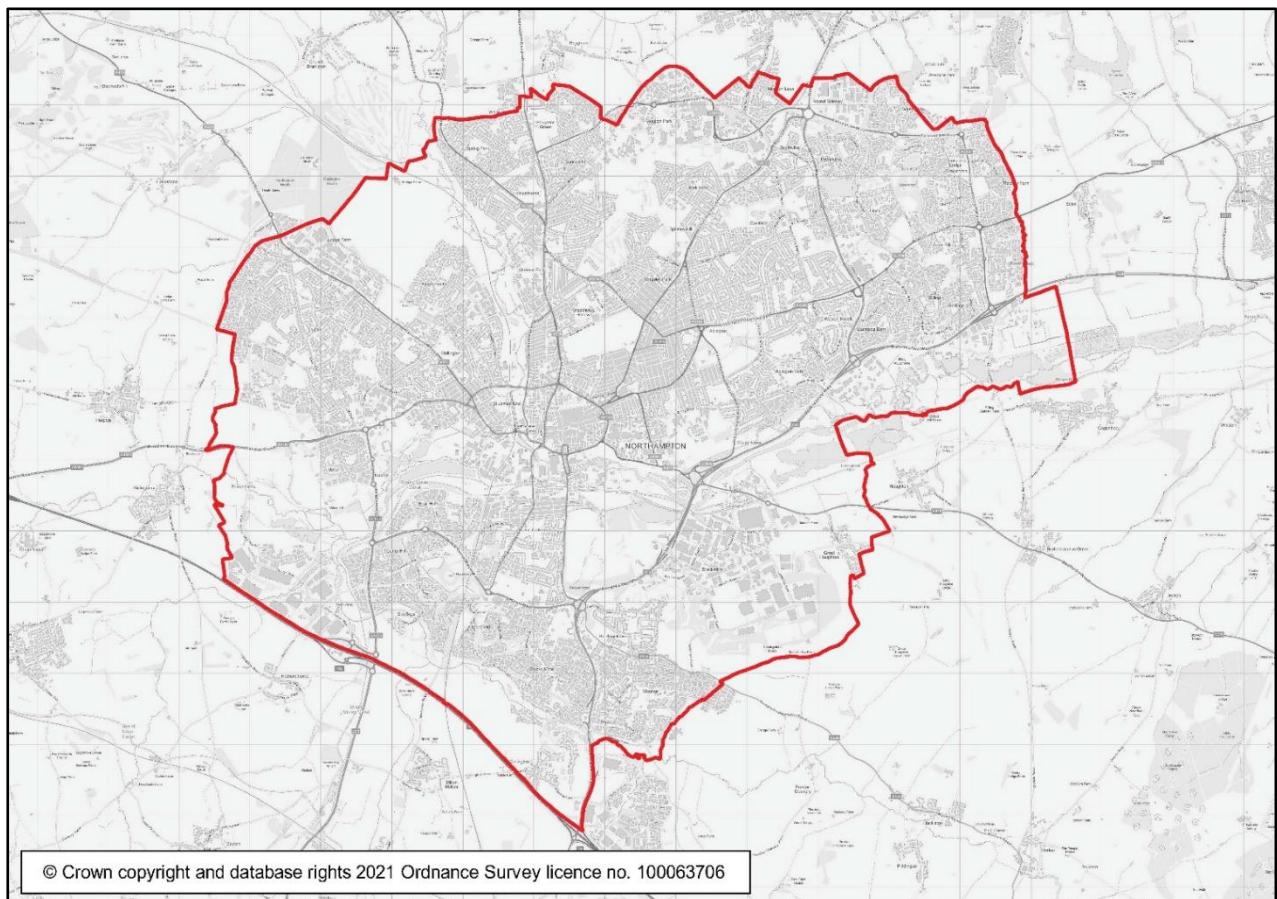
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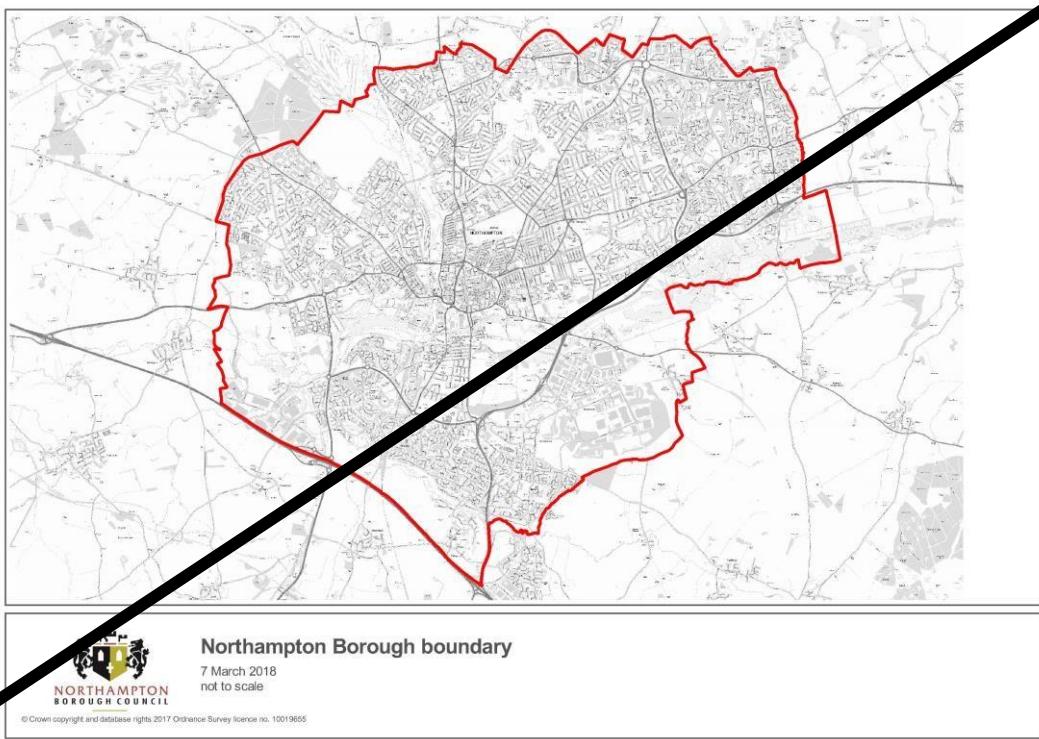
CHAPTER 1: INTRODUCTION AND POLICY CONTEXT

Planning Policy Context

1.1 ~~Northampton Borough~~ West Northamptonshire Council is preparing a new Northampton Local Plan Part 2, which will cover the ~~area~~ entire Borough of Northampton (see Figure 1) for the period up to 2029. The Plan (LPP2) will be in conformity to the West Northamptonshire Joint Core Strategy Local Plan Part 1 (WNJCS) which was adopted in 2014.

Figure 1: Northampton Plan Area Borough Boundary





1.2 LPP2, when adopted, will replace all the remaining saved policies from the previous Northampton Local Plan 1997 and update the policies contained in the Northampton Central Area Action Plan which was adopted in 2013 (see appendix B). It will include development management policies which will provide policy directions for sustainable development, housing delivery, retention and expansion of employment opportunities, supporting the growth and changing roles of the town centre, providing commercial and leisure enterprises as well as protecting and enhancing the built and natural environment. It will also include site specific allocations for various types of developments and/ or uses that are considered suitable for these sites.

1.3 The Plan also reflects the importance of climate change in the UK and how planning can have an impact on reducing emissions. Northampton Borough Council declared a climate emergency in June 2019. The Council is committed to making Northampton carbon neutral by 2030. This Plan forms a key part of the framework to address climate change including mitigation and adaptation.

1.4 This Plan forms part of the Development Plan for Northampton. The Development Plan is the basis upon which planning applications will be determined unless there are material considerations which indicate otherwise. The statutory Development Plan for Northampton consists of:

- West Northamptonshire Joint Core Strategy Local Plan Part 1
- Northampton Local Plan Part 2

- “Made” Neighbourhood Plans, which currently include the Duston Neighbourhood Plan, Spring Boroughs Neighbourhood Plan and Growing Together Neighbourhood Plan

1.5 The National Planning Policy Framework 2019 makes it clear that the local plan needs to be reviewed every 5 years and that development which accords with an up to date Plan should be approved. Any proposed development that conflicts with an up to date plan should be refused unless material considerations indicate otherwise. Therefore, it is important for local planning authorities to have up to date Local Plans to ensure that development is progressed in an acceptable and sustainable manner.

1.5A The Development plan should be read as a whole, including this Local Plan Part 2, the West Northamptonshire Joint Core Strategy, “made” Neighbourhood Plans and any documents that subsequently become part of the development plan. Planning applications will be determined having regard to the development plan and other material considerations.

Plan Preparation Process

1.6 The National Planning Policy Framework (February 2019) sets out the requirements for the preparation of the local plan. Plans must be prepared in accordance with legal and procedural requirements and be sound. Plans are sound if they are:

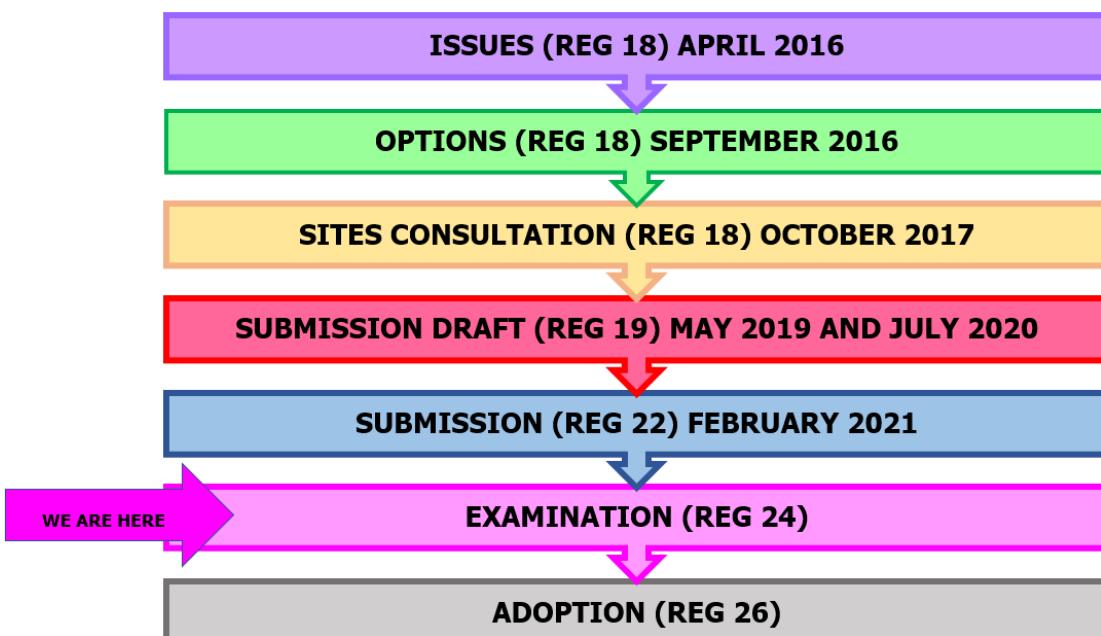
- Positively prepared – provide a strategy which will, as a minimum, meet as much as possible of the area’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need for neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
- Justified – an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground
- Consistent with national policy – enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework

1.7 In delivering the Local Plan, the Council has completed some key stages of the plan preparation process. The Issues, Options and Sites consultations were undertaken in 2016 – 2017, which provided the Council with information and

evidence on the key issues that the Local Plan needs to address, and how, in addition to delivering the requirements set out in the West Northamptonshire Joint Core Strategy. In May 2019, the Council prepared a Submission Draft for public consultation, containing policies and proposals which the Council intended to submit to the Secretary of State. 93 respondents made comments. These comments were considered and it was decided that elements of the Plan needed to be strengthened, through the inclusion of new policies and new sites. In addition, changes were made to the Planning Practice Guidance in relation to what constitutes a "deliverable" housing site and it was agreed that the sites allocated in the Plan need to be reviewed against the new set of criteria. It was decided that another round of consultation would be appropriate.

1.8 The key stages which the Council have completed are shown below:

Figure 2: Key stages of the Northampton Local Plan



1.9 Following the hearings conducted as part of the examination process, ~~consultation on the Submission Draft Round 2~~, the Council has will updated the Local Plan to takinge into account matters raised. The Modifications Version of the Plan incorporates all the proposed main modifications, which are essential to enable the Plan to be adopted, and proposed additional modifications which are factual updates. ~~the comments received~~. The Plan will then be submitted to the Planning Inspectorate for an independent examination.

Duty to Cooperate / Statement of Common Ground

1.10 The Localism Act 2011 introduced the requirement for the "Duty to Cooperate" (DTC). A section 33A was therefore inserted into the Planning and Compulsory Purchase Act 2004. This Act placed a legal duty on all local planning authorities, county councils, local enterprise partnerships and "prescribed bodies" (as defined by the regulations) to engage constructively, actively and on an ongoing basis, to maximise the effectiveness of local plan preparation relating to strategic cross boundary matters.

1.11 In regulation 4 of the Town and Country Planning (Local Planning) Regulations 2012, the bodies prescribed for the purposes of meeting the above legal duty are listed. In publishing its consultation documents for the Northampton Local Plan Part 2 to date, the Council has consulted all those included in the list of prescribed bodies.

1.12 In addition, ~~the Northampton Borough~~ Council worked closely with partners in ~~the former Daventry District, Northamptonshire County and South Northamptonshire Councils~~ in preparing the West Northamptonshire Joint Core Strategy Local Plan Part 1. The Council ~~has also continued to work~~ closely and engaged with ~~the partners above and Daventry and South Northamptonshire, as well as other authorities including the former Wellingborough Borough, East Northamptonshire and Kettering Councils (which now form North Northamptonshire Council) and Northamptonshire County Council~~, throughout the preparation of the Northampton Local Plan Part 2.

1.13 The NPPF also requires the preparation and maintenance of one or more Statements of Common Ground, which provide an explanation of how cross boundary matters were addressed and how various parties have worked cooperatively to address them. These will be prepared alongside the version of the Local Plan to be submitted to the Secretary of State.

Sustainability Appraisal and Habitats Regulations Assessment

1.14 In line with legislative requirements, each successive stage in the production of ~~the LPP2~~ has been the subject of a ~~s~~Sustainability ~~a~~Appraisal (SA). The Plan therefore conforms to the requirements set out in the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC) and ensures that the potential impacts of the plan, from an environmental, economic and social perspective, are taken into account throughout the process.

1.15 ~~The Sustainability Appraisal (SA) is an iterative process, which began with the development and assessment of the Northampton Local Plan Part 2 Options Consultation paper in September 2016. This stage was continued with SA of the sites consultation, which was released for consultation in October 2017 and an assessment of the reasonable alternatives in 2018 to inform the first proposed submission. A further review of the SA has been carried out for the Proposed Submission Round 2.~~

~~The updated Sustainability Appraisal document accompanied this local plan round 2 consultation.~~

1.15 The SA has been updated at each stage of consultation on the Northampton LPP2 including at the Options stage (September 2016), Sites consultation (October 2017), an assessment of the reasonable alternatives in 2018 to inform the Proposed Submission (1st Round) and again in 2020 for the Proposed Submission (2nd Round). To ensure the Plan has been assessed comprehensively, the SA has now been updated (in June 2022) to take into account the Proposed Modifications resulting from the examination so far.

1.16 Northampton contains part of the Upper Nene Gravel Pits Special Protection Area (SPA), which is a European designation for the conservation of natural habitats. The Upper Nene Valley Gravel Pits is also a Ramsar site. The Council is legally bound to carry out a Habitats Regulations Assessment (HRA) (Directive 92/43/EEC) to assess the impacts of the Local Plan proposals against the conservation objectives of the SPA.

1.16A The HRA has also been updated as the LPP2 has moved through the above stages of consultation. It was updated in June 2022 to take account of the Proposed Modifications resulting from the examination.

Previous Consultations

1.17 The Council has undertaken consultations in accordance with the requirements set out in the Town and Country Planning (England) Regulations 2012. These consultations also conform to the Council's Statement of Community Involvement, which seeks to inform and encourage participation in the evolution of the Plan.

1.18 In summary, the following consultation exercises have been completed:

- **Issues consultation** – this is the first stage of the plan preparation process and consultation took place in May/ June 2016. The public were consulted on the scope and the key issues the new Local Plan Part 2 should address
- **Options consultation** – this forms the second stage of the plan preparation process which confirmed that Northampton needs to deliver 18,870 new homes by 2029 and that a positive and proactive approach will be needed towards planning for new homes and jobs. Also of importance is the need to balance growth requirements against the need to protect and enhance the built and natural environment. This consultation took place between September and November 2016

- **Sites consultation** – the purpose of consulting on this third stage of the plan preparation process was to gather views on the potential future uses of sites to deliver the strategy and development required in the West Northamptonshire Joint Core Strategy, which forms Part 1 of the Local Plan. Consultation took place in October and November 2017
- **Proposed Submission Consultation (Round 1)** – the Council consulted on the policies and development allocations which it intended to submit to the Planning Inspectorate. This took place in May/ June 2019. It was concluded that there were a number of modifications to be made to the local plan, as well as the formulation of new policies. A second round of proposed submission consultation was considered necessary to allow people the opportunity to comment on these changes prior to the plan's submission to the Planning Inspectorate
- **Proposed Submission Consultation (Round 2) – The Council consulted on the policies and development allocations which it intended to submit to the Planning Inspectorate. This took place from June to September 2020.**
- **Examination – The Plan was submitted to the Planning Inspectorate in February 2021 and hearings took place in November 2021.**

1.19 ~~Further information can be found in the Consultation Statement which accompanies this Proposed Submission round 2.~~

CHAPTER 2: NORTHAMPTON NOW

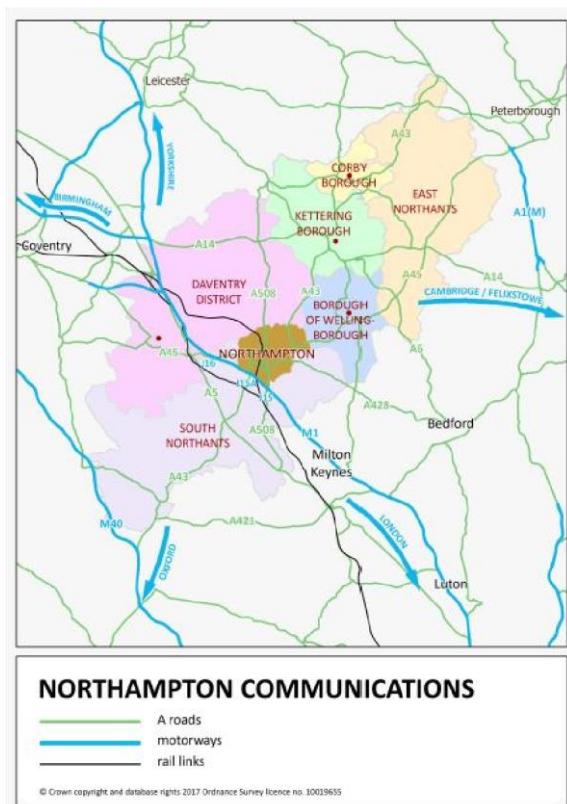
Profile of Northampton

Overview and Population

2.1 With a population of 225,100 in 2018, Northampton is the largest town in England. Planned expansion has led to the population figure reaching above 200,000 and the town continues to grow and maintain its role as a major employment, retail and residential centre within Northamptonshire.

2.2 It Northampton is located centrally in West Northamptonshire and centrally within Northamptonshire, covering an area of approximately 80 square kilometres. It is the main town in Northamptonshire (see Figure 3) and, particularly since its designation as a New Town in 1965, has absorbed several surrounding villages. The borough is bordered by Daventry District to the north and west, South Northamptonshire District to the south west and south and Wellingborough Borough to the east. There is no Green Belt in West Northamptonshire, or its neighbouring authorities.

Figure 3: Northampton Communications



2.3 As of December 2018, at least 63.1% of Northampton's residents are between the age of 16 and 64, which is the same rate the East Midlands and Great Britain¹. 32.6% have NVQ Level 4 and above, this is lower than the rate for East Midlands and Great Britain at 33.2% and 39.3% respectively. 6.6% do not have any qualifications, and this is also lower than the East Midlands (8.1 %) and Great Britain (7.8 %) averages.

Topography and hydrology

2.4 Northampton is located within a shallow "bowl" adjacent to the River Nene. It is surrounded by higher land, which rings the town, including Glassthorpe Hill (141m above sea level) to the west, Coneybury Hill (approximately 120m above sea level) and the Pitsford Ridge (approximately 125m above sea level). Within the town, there are three main areas of higher ground. These are to the south of the Nene Valley, the eastern edge of the town and the area around the former University campus towards the northern edge of the town.

2.5 The town is also located at the confluence of the River Nene and its tributary the Brampton Nene, which flows south into the Nene from Pitsford Reservoir. Smaller streams also influence the topography and hydrology of the town, including Dallington brook and the Wootton Stream, which flows into the Nene from the south. The Billing Brook, Ecton Brook and Sywell Bottom flow south into the Nene on the eastern side of the town.

Geology

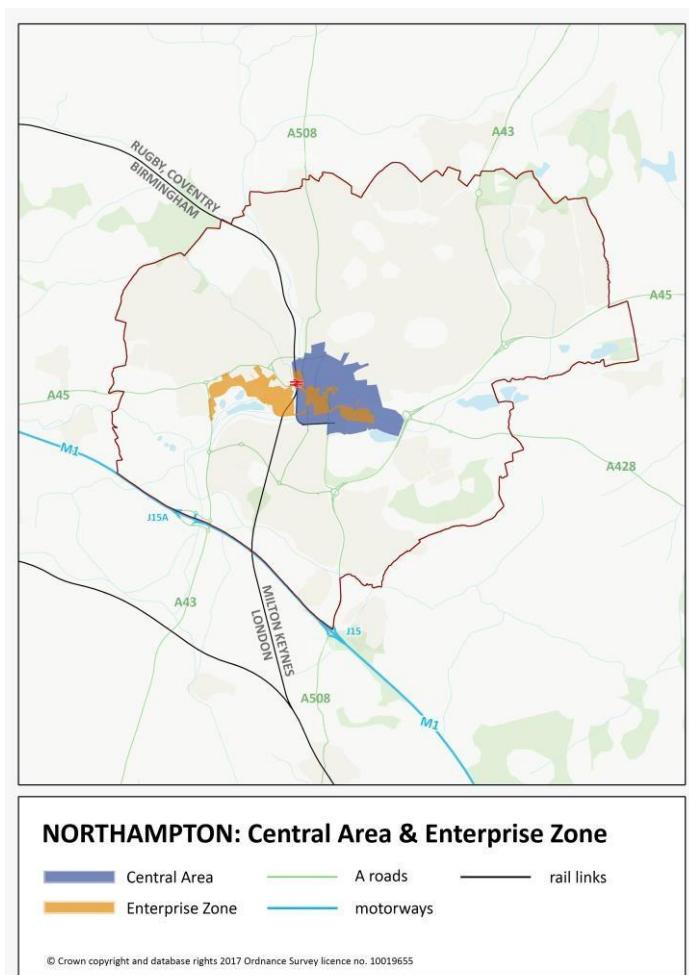
2.6 Northampton is located on the edge of the band of Oolitic limestone, which runs north-south through England. It lies at the junction of several types of limestone and the adjacent clay, which creates a complex geology for the area. The most well-known of the Oolitic limestones are the "Northampton sands and Ironstones" which have a distinctive golden-brown colour and are often seen in local buildings. The valley of the River Nene has accumulated deep sedimentary deposits of sand and gravel which have been quarried in recent years.

Central Area and Town Centre

2.7 The Central Area, incorporating the town centre (see Figure 4), its adjoining areas and parts of the Waterside Enterprise Zone, have experienced some key changes in recent years.

¹ https://www.nomisweb.co.uk/reports/lmp/la/1946157159/subreports/pop_time_series/report.aspx?

Figure 4: Northampton Central Area



2.8 These include the consolidation and relocation of the University of Northampton to its new premises (Waterside Campus) in Bedford Road, the development of the University's student accommodation in St John's Street, the opening of a new bus station in the town centre, the development of a new railway station building and the development of a new Premier Inn hotel in St John's Terrace. Also of significance is the University of Northampton's Innovation Centre, located close to the railway station, offering 42 flexible office units, a cafe and conference space.

2.9 Northampton Town Centre is a regional shopping centre and remains the main retail and services centre within Northamptonshire. A recent study concluded that Northampton town centre, its district and its local centres are performing well in spite of the closures of national chains like BHS and Marks and Spencer. This is attributed to the wide-ranging shops and services currently available in these centres which

cater for Northampton's population and its catchment. It is also evident that people from outside Northampton do visit the town centre.

2.10 The town centre currently accommodates the indoor retail units of the Grosvenor Centre, Market Walk and the Ridings Arcade. It has an outdoor market area, the largest in England. There are tourist attractions within the Cultural Quarter, which centres around a creative cluster in the area around Derngate/Guildhall Road. The Royal & Derngate theatre, Northampton Film House cinema and a major new extension to the Northampton Museum and Art Gallery creating new galleries/ teaching facilities/ retail area are major attractions within the Cultural Quarter. The Northampton Museum and Art Gallery is home to the world famous Shoe Collection, a collection of national importance. 78 Derngate commemorates the works of Charles Rennie Mackintosh. Conversion of the Vulcan Works into a managed workspace for around 100 businesses within the Cultural Quarter will support job creation over the plan period. Also, NN Contemporary Art space occupies 9 Guildhall Road in the Cultural Quarter, providing art space for artists at all stages of their careers.

2.11 Northampton has 3 professional sports grounds, Northampton Saints Rugby at Franklins Gardens, Northampton Town Football at PTS Academy Stadium and Northamptonshire County Cricket in Abington. They attract visitors and sports fans, as well as publicising venues for hire for special events (such as weddings, birthdays and entertainment).

Housing

2.12 Northampton is predominantly an urban area. Northampton continues to experience pressures in housing delivery, with a growing population and a gradual reduction in land availability contributing to this problem. In addition, in spite of planning consents, and allocations for Sustainable Urban Extensions within Northampton and its immediate surrounding areas, Northampton has not been able to meet its 5 year housing land supply as required by the Government.

Table 1: Housing completions and delivery in Northampton (2011 – 20192021)

	JCS Requirement 2011 – <u>2019</u> <u>2021</u>	Actual Housing Completions (Net Additions)	Delivery of Dwellings compared to the requirement
Total dwellings	8,157 <u>11,236</u>	5,727 <u>6,957</u>	-2,430 <u>-4,279</u>

2.13 Northampton's house prices² continue to be higher on average than properties within the East Midlands, but lower than the United Kingdom average. Its relatively higher average compared to the rest of the areas within the East Midlands could be attributed to its accessibility to both London and Birmingham as well as Milton Keynes.

House Price Comparisons in UK, East Midlands and Northampton

Date	UK	East Midlands	Northampton
Aug-17	£225,738	£182,763	£205,140
Oct-17	£225,092	£184,044	£207,544
Dec-17	£225,330	£184,942	£208,255
Feb-18	£225,131	£187,235	£207,240
Apr-18	£225,910	£187,276	£209,487
Jun-18	£228,355	£189,259	£213,274
Sep-18	£231,454	£194,049	£215,086
Dec-18	£229,865	£191,781	£211,759
Mar-19	£227,225	£190,677	£211,824
Jun-19	£230,661	£192,767	£212,031
Sep-19	£234,370	£194,219	£214,475

Economy

2.14 Northampton has high levels of employment, with 118,800 people in employment by March 2019³. This equates to 83.7% of Northampton's economically active population. This is above the East Midlands level of 79% and Great Britain at 78.7%. Situated within the wider Oxford – Milton Keynes – Cambridge Corridor, the borough of Northampton is an important centre for high performance engineering and high end shoe manufacturing as well as being highly represented in business administrative and support services, financial and insurance activities, storage and distribution and manufacturing. Major employers include Barclaycard, Cosworth, Panasonic UK Ltd, Travis Perkins, Avon, Carlsberg UK and Nationwide Building Society.

² Land Registry House Price Index

[https://landregistry.data.gov.uk/app/ukhpi/compare?in=avg&location\[\]=%E07000154&location\[\]=%E12000004&location\[\]=%E02000001&st=all](https://landregistry.data.gov.uk/app/ukhpi/compare?in=avg&location[]=%E07000154&location[]=%E12000004&location[]=%E02000001&st=all)

³ <https://www.nomisweb.co.uk/reports/lmp/la/1946157159/report.aspx>

2.15 The Borough Northampton's importance as a centre for employment is reflected in the fact that overall there was a ~~is~~-net inflow of about 12,000 commuters to the area ~~borough~~ for travel to work in 2011 (an inflow of 39,545 people to work in Northampton and an outflow of 27,442)⁴

2.16 Northampton has an Enterprise Zone, which was designated in August 2011. Since its designation, over 5,000⁵ new jobs have been created and significant regeneration schemes have taken place. These include the development of the new bottling/ canning plant at Carlsberg, the expansion of Cosworth, the completion of the redeveloped railway station and the completion of a new campus for the University of Northampton.

2.17 Over the last 25 years, the town centre has not seen the level of retail investment that would be expected for a centre of its size. Although there has been some small-scale retail investment, this has not addressed the needs of modern town centre retailers.⁶

2.18 Northampton, similarly to many of these other towns across the country, has seen vacancy rates and footfall data support the analysis above, with vacancy rates for the whole of the town centre area increasing from 12.7% in 2015 to 13.9% in 2019. Within the primary shopping area, this increase is even more pronounced increasing from 14.7% in 2015 through to 17.5% in 2019. Footfall has fallen by over 15% in the town centre over the past 3 years, from 24.5m in 2016 down to 20.6m in 2018.⁷

Tourism

2.19 Northampton has an opportunity to capitalise on tourism as part of the town centre's regeneration strategy. In Northamptonshire, the number of visitors in 2018 was 249,460⁸. Although this represented a fall of 8.9% from 2017, the average length of stay increased by 1.7% and the average spend per visit also increased by 36.22%.

⁴ WU03UK – Location of usual residence and place of work by method of travel (Office of National Statistics, Census 2011)

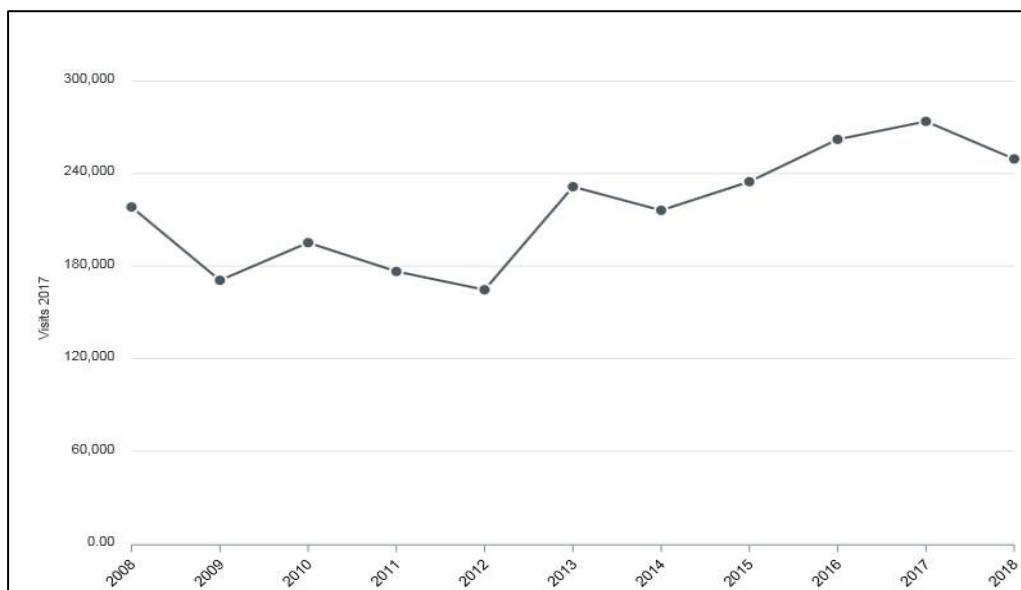
⁵ Northampton Borough Council Regeneration (November, 2019)

⁶ Northampton Town Centre Masterplan Cabinet Report, October 2019

⁷ Northampton Town Centre Masterplan Cabinet Report, October 2019

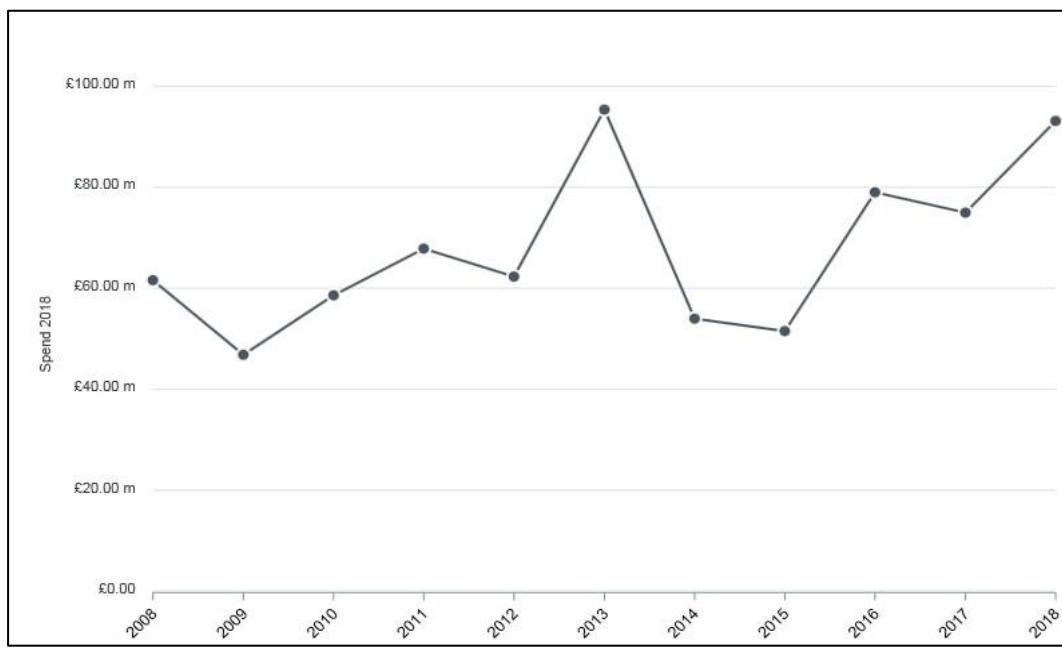
⁸ <https://www.visitbritain.org/nation-region-county-data?area=1570>

Figure 5: County visitors



2.20 Expenditure in the County was £93.14m, and there has been an upward trend over the last 14 years.

Figure 6: County expenditure on tourism



2.21 To support any future requirements associated with the tourism, visitor and cultural sectors, a hotel study⁹ was commissioned by Northampton Borough Council to provide an assessment of the future potential for hotel development in Northampton to inform the Northampton Local Plan Part 2.

2.22 Northampton is served by 24 hotels (1,670 letting rooms) with budget/ limited service (55%), 3* and 4* (22%). This includes the Premier Inn which opened in the town centre in December 2015. Northampton has fewer hotel bedrooms than the comparator towns and cities of Leicester, Milton Keynes and Reading.

Table 2

Category/ Standard of Hotel	NORTHAMPTON HOTEL SUPPLY – MAY 2016					
	Northampton Town Centre		Edge of Town Locations		Northampton Borough	
	Hotels	Rooms	Hotels	Rooms	Hotels	Rooms
4 star			2	259	2	259
4 star Inn			1	19	1	19
Boutique					0	0
3 star	1	146	3	206	4	352
Upper-tier Budget			1	126	1	126
Budget	3	320	8	460	11	780
Lower grade	2	63			2	63
Serviced Apartments/Aparthotel	1	10	1	29	2	39
Conference centre			1	32	1	32
Total	7	539	17	1131	24	1670

2.23 The Hotel Study states that although gradually improving, the performance of Northampton's branded 3 and 4 star hotels has been well below national averages over the last 3 years and this covers all performance indicators (including room occupancy and achieved room rates). In contrast, branded budget hotels performance has been strong.

⁹ Northampton Hotel Futures: hotel audit and demand assessment (Hotel Solutions, May 2016)

Table 3

Standard of Hotel	NORTHAMPTON HOTEL PERFORMANCE 2013-2015									
	Average Annual Room Occupancy %			Average Annual Achieved Room Rate ⁴ £			Average Annual Revpar ⁷ £			
	2013	2014	2015	2013	2014	2015	2013	2014	2015	
UK Provincial Hotels (All Standards) ¹	72.6	75.4	76	59.94	64.03	67	43.53	48.27	51	
UK Provincial 3/4 Star Chain Hotels ²	72.0	73.7	74.9	71.46	74.90	80.51	51.48	55.20	60.33	
Northampton Branded 3/4 Star Hotels ³	68.4	72.0	71.7	65.57	68.09	73.25	44.86	49.02	52.55	
Northampton Branded Budget Hotels ⁴	72.3	77.4	77.2	42.5	47.16	53.14	30.74	36.51	41.00	
Northampton Unbranded Hotels ⁵	44.4	55.3	57.6	38.31	40.45	48.41	17.03	22.39	27.88	
Northampton – All Hotels	68.5	73.6	73.6	50.31	53.87	59.66	34.46	39.65	43.89	

Notes

1. National averages - source: STR Global
2. National averages - source: Hotstats
3. Source: STR Global. Sample: Northampton Marriott, Hilton Northampton, Holiday Inn Northampton, Park Inn by Radisson Northampton
4. Source: STR Global. Sample: all branded budget hotels in Northampton.
5. Source: Hotel Solutions survey of Northampton hotels –March 2016 Sample: Hopping Hare, The Plough, Westone Manor (unbranded hotels)
6. The amount of rooms revenue (excluding food and beverage income) that hotels achieve per occupied room net of VAT, breakfast (if included) and discounts and commission charges.
7. The amount of rooms revenue (excluding food and beverage income) that hotels achieve per available room net of VAT, breakfast (if included) and discounts and commission charges

2.24 Corporate demand is set to increase significantly given the planned office development and employment growth in the Enterprise Zone. Substantial growth is also expected in the contractor business (mainly budget and lower priced unbranded hotels given the scale of construction work). There is therefore scope for growth in residential conference business – the market remains constrained by the lack of 3 / 4 star hotel bedroom availability on Tuesday and Wednesday nights, and Northampton's limited supply of 4 star hotels with good conferencing facilities.

2.25 The study alluded to on-going events that generate demand for hotel accommodation. These include the sporting events associated with rugby, football and cricket which will continue to have a positive impact on the town's larger hotels and conference venues at these sports grounds to attract weekend association conferences, exhibitions and events. Silverstone (~~not within Northampton's borough boundary~~) will continue to be a key driver for weekend business for Northampton hotels. The proposed Silverstone Motor Sport World attraction could however provide a new draw that Northampton hotels can use to attract weekend leisure break stays. Events at Santa Pod Raceway will continue to generate demand for some budget and unbranded hotels in Northampton. Other events influencing demand for accommodation are the Alive@Delapre concerts, Northampton Balloon Festival and concerts at MK Bowl.

2.26 The study also contained projections of possible future growth in Northampton, between 2016 and 2029, using the Hotel Futures demand forecasting model. Projections were prepared for 3* and 4* star hotels and budget hotels, taking Northampton's current supply of hotels and the estimates of 2015 room per night demand as the baseline for the projections. The results of the demand projection is shown below.

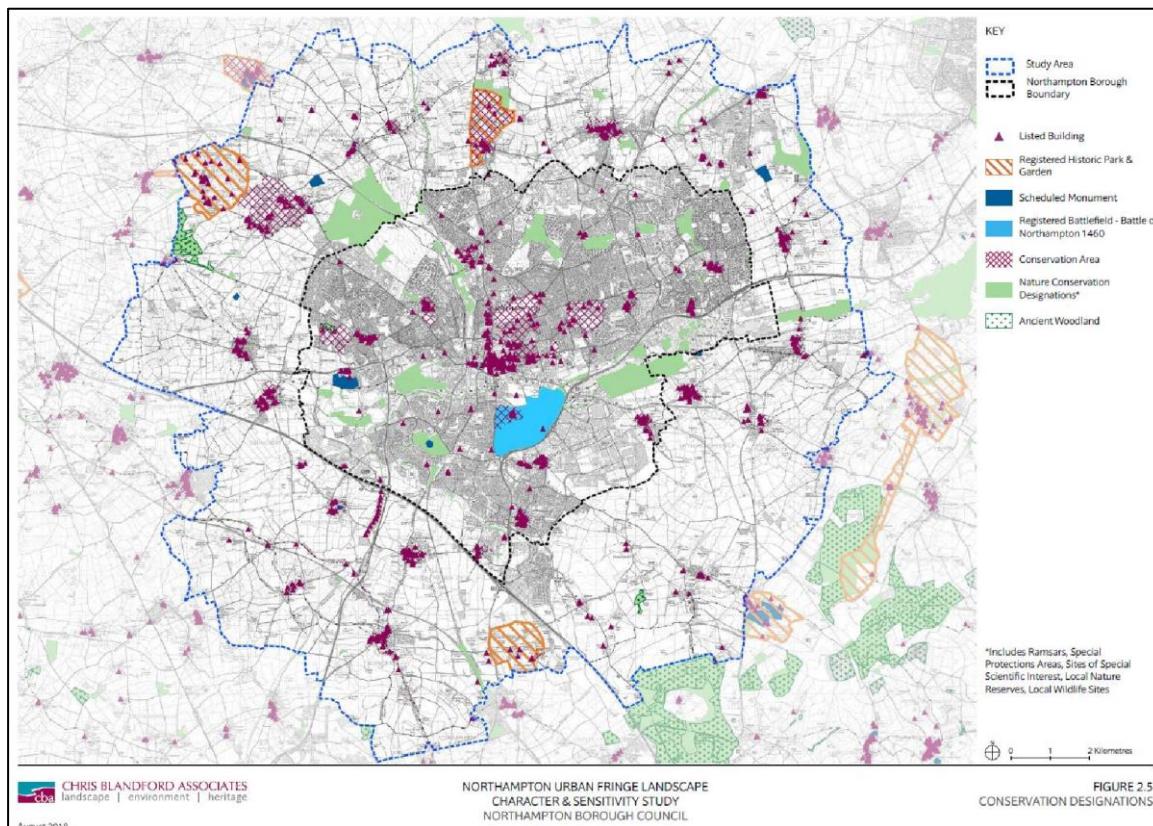
Table 4

NORTHAMPTON PROJECTED REQUIREMENTS FOR NEW HOTEL DEVELOPMENT – 2016-2029			
STANDARD OF HOTELS/YEAR ¹¹	PROJECTED NEW ROOMS REQUIRED		
	LOW GROWTH	MEDIUM GROWTH	HIGH GROWTH
3/4 Star Hotels			
2016 – 2019	45	56	67
2020 – 2024	83	109	137
2025 – 2029	123	168	216
Budget Hotels			
2016 – 2019	9	27	46
2020 – 2024	88	134	182
2025 – 2029	175	254	337
TOTAL NEW HOTEL ROOMS			
2016 – 2019	54	83	113
2020 – 2024	171	243	319
2025 – 2029	298	422	553

Heritage and historic landscapes

2.27 Northampton has a range of heritage assets, including over 500 listed buildings (such as Delapre Abbey, the Guildhall, County Hall and All Saints Church) and 21 conservation areas. There are four conservation areas within the town centre alone, which reflects the town's strong heritage legacy. In addition, there is also a Registered Battlefield within Northampton's boundary, located partly within the grounds of the Barnes Meadow Local Nature Reserve and Delapre Abbey Park. There are 7 scheduled monuments in the Borough Northampton. Other heritage sites of interest include the remains of Northampton Castle which can be found close and within the grounds of Northampton Railway Station and the Ironstone Heritage Centre, which is home to the Northamptonshire Ironstone Railway Trust. The latter is based within the grounds of the Hunsbury Hill Country Park.

Figure 7: Heritage and Historic Landscapes in Northampton¹⁰ (Crown Copyright and database rights 2018 Ordnance Survey Licence no 10019655)



Green Infrastructure, Open Space and Leisure

2.28 Northampton currently has over 1,600 hectares of parks, open spaces and other green areas that provide a network that both supports biodiversity as well as providing ecosystem services. Together with the River Nene, these natural and man-made corridors provide valuable natural and historic assets which are of great importance for sustaining and enhancing biodiversity. In addition, parts of Northampton also accommodate the Upper Nene Valley Gravel Pits Special Protection Area (also a Ramsar site) and six Local Nature Reserves.

2.29 These assets do vary in terms of their distribution, quality and accessibility and opportunities remain for connections and linkages to be improved. Furthermore green and open spaces can be added and the green infrastructure network can be made more complete.

2.30 In addition, Northampton also has significant leisure provision, including commercial leisure centres, such as the centres run by the Leisure Trust (Danes

¹⁰ Northampton Urban Fringe Landscape Character and Sensitivity Study (Chris Blandford Associates, 2018)

Camp, Lings Forum, Mounts Bath, Cripps), cinemas (at Vue Sol Central and Cineworld Sixfields), various private gyms, indoor and outdoor sports facilities and playing pitches (for example the Old Northamptonians / Old Scouts / Casuals rugby clubs) and the Nene White Water Rafting Centre in Bedford Road. Northampton also has a marina at Becket's Park, which is ideally placed within the national canal network providing all the necessary facilities for boat users.

Transport and Movement

2.31 80% of people who work in ~~the Borough~~ Northampton live in ~~the Borough~~ Northampton, with the majority of travel to work trips being less than 5km¹¹. 61% of these journeys are made by car adding almost 59,000 trips on the road network. The trips made to places outside ~~the Borough of~~ Northampton are to a number of locations, including Milton Keynes, with public transport journeys presently only making up 4% of these inter-urban trips. ~~The Borough~~ Northampton has a high level of car ownership, which is the dominant mode of travel.

2.32 ~~The Borough~~ Northampton benefits from a range of key strategic highway network connections including three junctions of the M1 (Junctions 15, 15A and 16). The A43 links to the M40 Motorway linking Oxford and the south of England and the A14 at Kettering and the A45 trunk road runs through the town from the M1 providing links to Wellingborough, Rushden and the A14 at Thrapston. Work is taking place to upgrade Junctions 13 to 16 of the M1 to a "smart" motorway with additional capacity.

2.33 Northampton is served by one modern and central railway station, which is on the Northampton loop of the West Coast Main Line. The station was redeveloped and opened in 2015 to accommodate increasing passenger demand. It is located within 10 minutes' walk of the town centre. It is served by London Northwestern Railway train services to both London and Birmingham New Street, with some services continuing to Liverpool, Crewe and Rugeley. There are three trains per hour each to London Euston and Birmingham New Street, off peak, Monday to Saturday which makes both cities accessible from Northampton.

2.34 Northampton has access to Birmingham International Airport, London Luton Airport and East Midlands Airport. Luton and East Midlands Airport can be reached within a one-hour car journey and Birmingham International can also be accessed by direct train. There are other airports which are accessible to those living in Northampton, such as Heathrow and Gatwick, which are within 2 – 2 ½ hours by train or car.

2.35 Northampton's strategic location makes it attractive for logistics and distribution, as well as head office functions.

¹¹ West Northamptonshire Joint Core Strategy Local Plan (Part 1)

2.36 Northampton has a network of local bus services as well as interurban bus and coach services. Most local bus services radiate from the North Gate bus station, in the town centre. The station was opened in 2014, having moved from its previous location at Greyfriars. Stagecoach operates most of the local services and National Express coaches run from Victoria Street.

2.37 Northampton accommodates around 10,000 car parking spaces which are formed of over 20 private and public surface and multi storey car parking facilities.

Low Emissions Travel

2.38 There is a movement towards more sustainable forms of travel which will include the increasing use of electric and hybrid vehicles for private, public and business related journeys. This is complemented by a decrease in use of petrol and diesel vehicles. This will result in the reduction of carbon emissions, improvement to air quality and the encouragement of more environmental friendly forms of travel.

2.39 The Council's Low Emission Strategy¹² (LES) aims to improve air quality and health across Northampton by reducing vehicle emissions through the accelerated take up of cleaner fuels and technologies and the implementation of mitigation measures in new developments. Evidence for the strategy found that whilst levels of nitrogen dioxide have improved in some areas of Northampton, concentrations of NO₂ and particulate matter, specifically PM10s, at key locations have remained elevated over the last decade and at some locations, concentrations have increased. This has resulted in the declaration of Air Quality Management Areas.

2.40 There are currently 7 Air Quality Management Areas in Northampton. (see Figure 8): These are areas which exceed the Government's air quality objective and where there is relevant exposure to the public. ~~A consultation is presently underway~~ It is the intention to amalgamate all the central AQMAs into one large AQMA covering the town centre to promote consistency in applying the LES. The proposed Town Centre AQMA is shown in Figure 8.

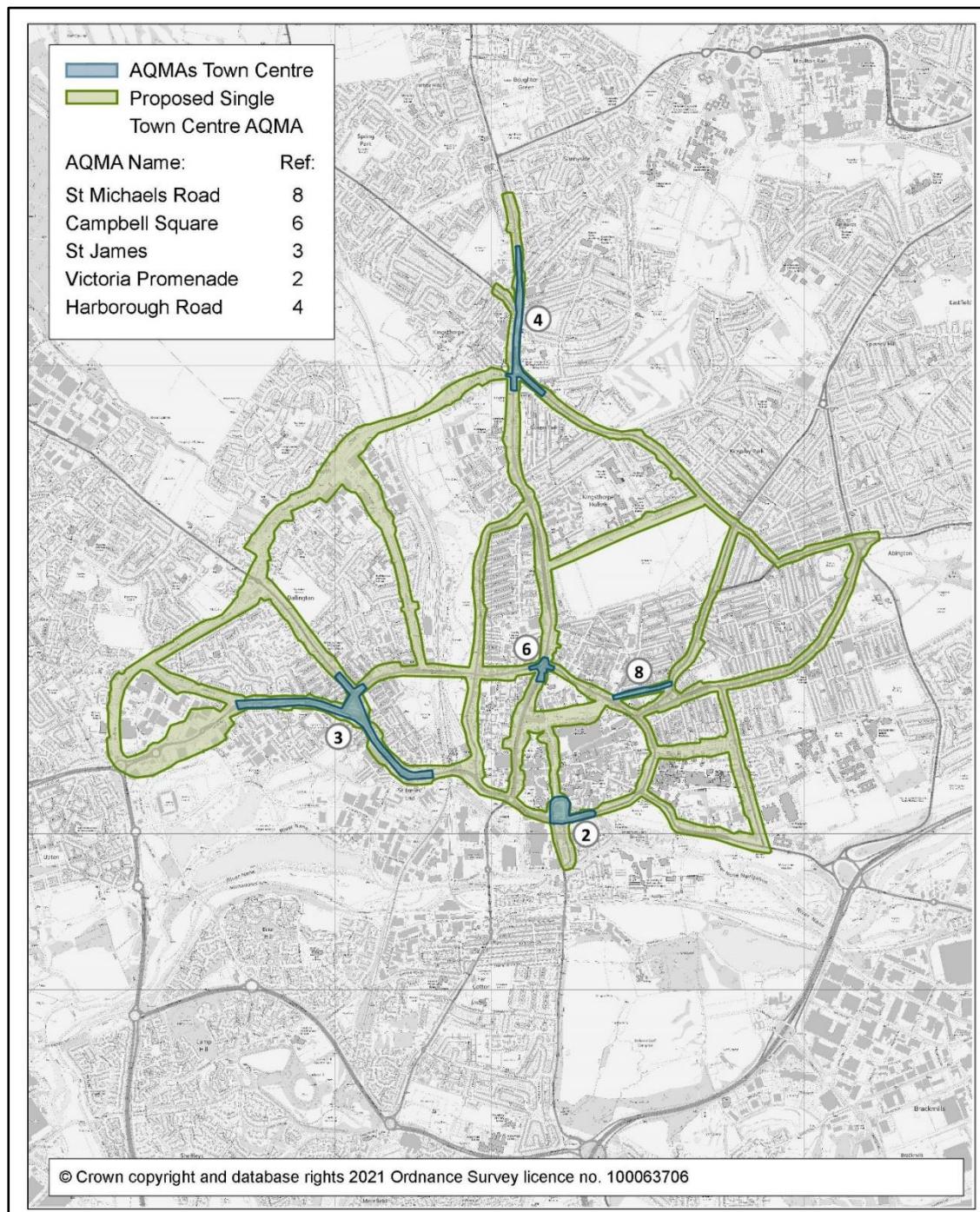
2.41 The predominant cause of elevated levels of NO₂ and particulate matter is road transport emissions. The emissions from different vehicle types have a varying significance, depending on the location. The LES quoted examples from buses, considered to be a significant contributor in the inner urban area and on arterial routes, whereas heavy and light goods vehicles are a significant contributor on trunk roads. Cars (especially diesel) play a significant role in all areas.

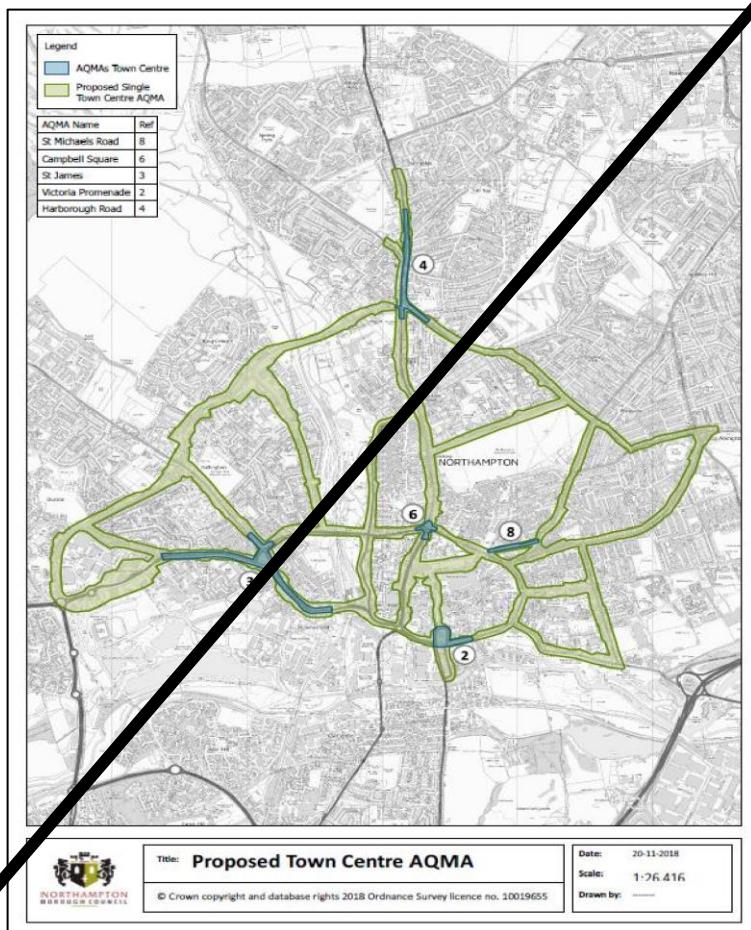
2.42 The LES concluded that the number of people affected by asthma and chronic obstructive pulmonary disease in Northampton is higher than for England as a whole.

¹² Northampton Low Emission Strategy 2017 – 2025 (Northampton Borough Council, December 2017)

Evidence also suggests that there is a close link between air pollution and areas of high deprivation. Individuals living in areas of high deprivation often live in accommodation close to roads that have high levels of emissions. Individuals in more deprived areas tend to have poorer health, suffer more adverse health effects than people experiencing the same level of emissions exposure in less deprived areas.

Figure 8: Proposed Town Centre Air Quality Management Areas





Health and Wellbeing

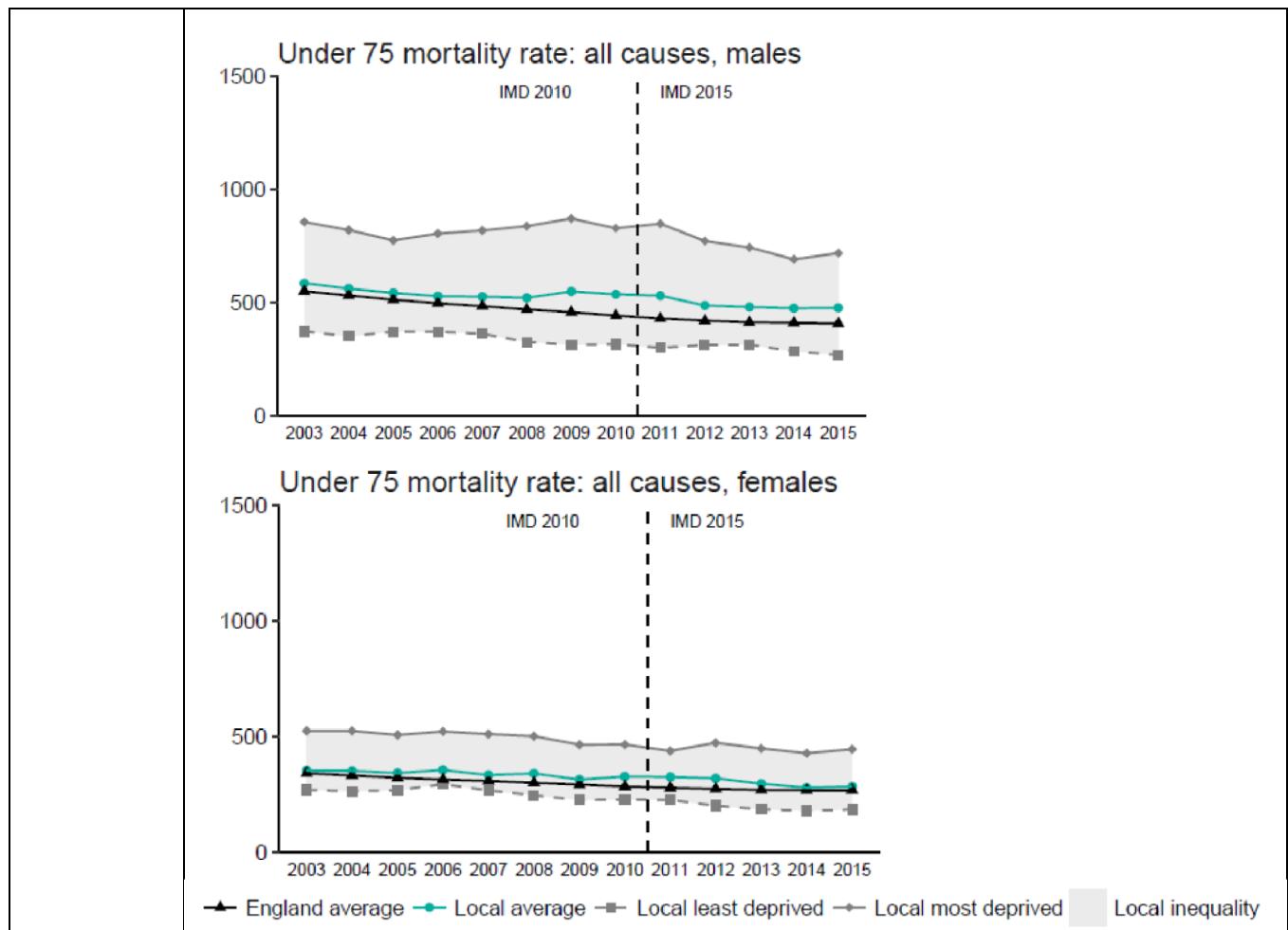
2.43 Northampton faces significant challenges in relation to health and wellbeing. In July 2018, Public Health England¹³ published the Northampton District Local Authority Health Profile which illustrates this.

Table 5
A Summary of Public Health England's Population Profile for Northampton
3rd July 2018

Overview	The health of people in Northampton is varied compared with the England average. Around 16% (7,400) of children live in low income families, which is slightly higher than the Northamptonshire average of 14% (19,300).
Child Health	In year 6, 20.8% (467) of children are classified as obese in Northampton which is slightly higher than the Northamptonshire average of 19.4% (1,376).

¹³ Public Health England Northampton profile July 2018

Adult Health	The rate of alcohol related harm hospital stays in 907 per 100,000 population, which is above the average for England. This represents 1,879 stays per year. This is slightly higher than the hospital stays for Northamptonshire at 766.																		
Life expectancy	The charts below show that Northampton has a larger gap in life expectancy for males and females compared to Northamptonshire.																		
	<p style="text-align: center;">Northampton</p> <table border="1"> <caption>Estimated data for Northampton life expectancy by deprivation</caption> <thead> <tr> <th>Deprivation Level</th> <th>Males (Years)</th> <th>Females (Years)</th> </tr> </thead> <tbody> <tr> <td>Most deprived</td> <td>75.5</td> <td>79.5</td> </tr> <tr> <td>Least deprived</td> <td>85.5</td> <td>86.5</td> </tr> </tbody> </table> <p style="text-align: center;">Northamptonshire</p> <table border="1"> <caption>Estimated data for Northamptonshire life expectancy by deprivation</caption> <thead> <tr> <th>Deprivation Level</th> <th>Males (Years)</th> <th>Females (Years)</th> </tr> </thead> <tbody> <tr> <td>Most deprived</td> <td>76.5</td> <td>79.5</td> </tr> <tr> <td>Least deprived</td> <td>83.5</td> <td>85.5</td> </tr> </tbody> </table>	Deprivation Level	Males (Years)	Females (Years)	Most deprived	75.5	79.5	Least deprived	85.5	86.5	Deprivation Level	Males (Years)	Females (Years)	Most deprived	76.5	79.5	Least deprived	83.5	85.5
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Trends over time (under 75 mortality)	The chart below shows that Northampton's mortality rates for all causes for men and women are slightly higher than the England average. However, for females, the gap reduced between 2014 and 2015.																		



2.44 Other data from Public Health England¹⁴ indicates that, in 2015-17, the life expectancy for males in Northampton is 78.5 years, which is lower than figures for the East Midlands (79.4 years) and England (79.6 years). For females life expectancy is 82.5 years in Northampton, which is worse than the figures for the East Midlands (82.9 years) and England (83.1 years). As well as being, in general, lower than averages for the region and England, male life expectancy in Northampton is also 10.2 years lower in the most deprived area than it is in the least deprived. The equivalent figure for female life expectancy is 6.6 years.

2.45 Figures from 2017/18 indicate that 68.1% of Northampton's population is classified as overweight or obese. 22.7% of children in school reception year were classified as overweight, rising to 33.7% in Year 6. Public Health England figures indicate that, for schoolchildren, the recent trend has been for these percentages to rise.

¹⁴ Public Health England, September 2019 -

<https://fingertips.phe.org.uk/profile/healthprofiles/data#page/1/gid/1938132696/pat/6/par/E12000004/ati/101/are/E07000154/iid/90366/age/1/sex/1>

2.46 There is a need to ensure that Northampton the Borough is better equipped to deal with meeting people's health requirements, particularly in light of its growing population. Within Northampton, there are a range of public and private health facilities including Northampton General Hospital, GP surgeries, dentists, pharmacists and other health care providers.

Key Challenges and Opportunities for Northampton

Challenges

Climate change

2.47 In common with the rest of the United Kingdom, Northampton has to face the challenge of climate change. The implications of climate change nationally and internationally are well known. Government guidance, set out in the NPPF requires planning to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability, improve resilience, encourage the re-use of existing resources and support the renewable and low carbon energy and associated infrastructure.

2.48 To deal with these challenges locally and, in the context of the strength of public opinion, the Northampton Borough Council has declared a Climate Emergency in Northampton. and West Northamptonshire is committed to a target of making West Northamptonshire carbon neutral by 2030.

Housing delivery

2.49 An important challenge for Northampton is the delivery of homes, including affordable housing, to meet the identified need for existing and future Northampton residents. It is becoming increasingly challenging to deliver the number of dwellings required within an area that is compact, extensively built-up and has competing priorities.

2.50 The Government, through the 2019 NPPF, has made it clear that the local plan has an important role in supporting the Government's objective to significantly boost the housing supply and that the needs of groups with specific housing requirements are to be addressed. The West Northamptonshire Joint Core Strategy identifies a provision of 18,870 new homes to be built within Northampton Borough from 2011 to 2029. Evidence shows that the Borough Northampton does not have a 5 year housing land supply, though Northampton the Borough passed the Government's Housing Delivery Test in February 2020.

Deprivation and health

2.51 Northampton has significant areas of deprivation, including parts of the eastern and central areas. However, like most towns of this size, there are parts of the borough which are relatively affluent. There is a need to ensure that the requirements of Northampton's current and emerging population, businesses, investors and visitors are met in a balanced and consistent manner. Combined with a growing population, there is a need to plan for healthier communities, addressing the health and lifestyle issues that have resulted in Northampton having poor health outcomes, particularly in the most deprived areas. Poor health has adverse implications for:

- Individual and community wellbeing
- demand for health and care services
- productivity and the local economy

Competing priorities

2.52 Northampton has nationally important heritage assets including the former grounds of Northampton Castle, Delapre Abbey, the Queen Eleanor Cross, the Battlefield and local Churches, including St Peter's Church and the Holy Sepulchre (one of only four round churches in the country), plus conservation areas and other important listed buildings. These heritage assets provide valuable resources to the town, not just from a historic and architectural point of view but also from an economic perspective through tourism. It is therefore a challenge for Northampton to deliver homes and jobs, but without impacting adversely on the survival of these assets.

2.53 Equally important are the vast numbers of open spaces and green infrastructure in Northampton, which provide residents and visitors with health benefits, as well as education in nature conservation matters. These include the Local Nature Reserves, Abington Park, the Racecourse, and various green spaces and recreational areas located within the ~~Borough~~ Northampton. Ongoing pressure to deliver houses and jobs means that some of the spaces which are assessed as being less valuable could be lost, and the issue of balance and meeting competing priorities is challenging.

Opportunities

Brownfield Land and the Enterprise Zone

2.54 Brownfield and vacant sites, including those listed in the Northampton Brownfield Land Register and Land Availability Assessment, show that there are opportunities for development on these sites. It is accepted that some of these sites

may have constraints which have deterred developers from developing. Particular styles of housing, for example flats with hard landscaping rather than houses with gardens may be more suited to land which has a previously contaminative use where the cost of mitigation measures exceeds the value of the land. Ongoing partnership approaches and flexible, viable policies (including the flexible approach of permitted development rights) may result in more positive outcomes for these sites. A competent person, with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation would have the knowledge in dealing with such sites. In addition, the following may also be helpful:

- Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination
- Refer to the Environment Agency's Guiding principles for land contamination for the type of information that we require in order to assess risks to controlled waters from the site – the local authority can advise on risk to other receptors, such as human health
- Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- Refer to the contaminated land pages on gov.uk for more information

2.55 The Enterprise Zone continues to provide opportunities for both new developments and expansion schemes. Commercial operators have already benefitted from these opportunities including the relocation of an operator from Brackmills to a much larger and modern property within the Enterprise Zone.

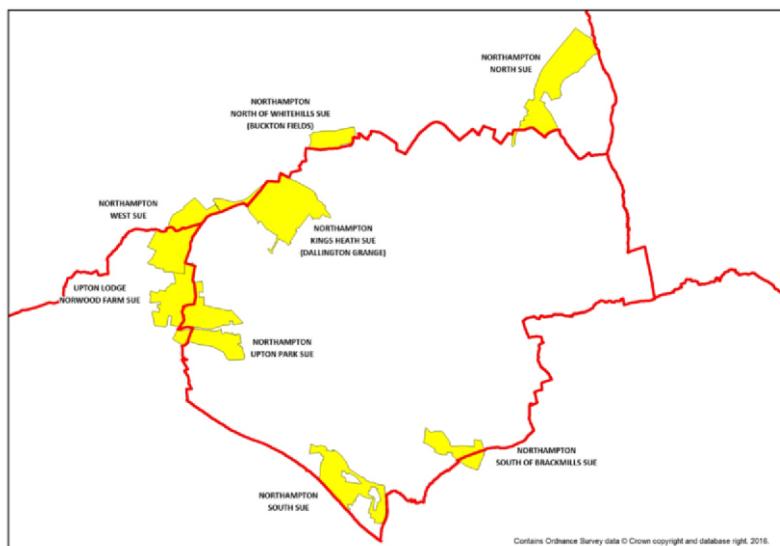
Economic Opportunities

2.56 There is a further economic development opportunity in developing a coordinated approach to emphasise the historic identity of the ~~Borough~~ Northampton, its heritage assets, open spaces and opportunities to repurpose the town centre. This could help to attract investment from relocating businesses, improve rates of business tourism and build the ~~Borough~~ Northampton's attractiveness for wider tourism as well as injecting new life into the town centre by welcoming wide ranging new roles including more cultural and leisure related services. In addition, the River Nene also contributes positively to Northampton's economy. The marina is an integral part of the Becket's Park area and enables waterway users to have a safe place to stay. Its connectivity to the town centre means that waterway users can contribute to the economy of the town for leisure, retail and/or cultural reasons. In addressing these opportunities, the Local Plan helps to deliver priorities set out in the Northampton Economic Growth Strategy 2020-2025, May 2020.

Sustainable Urban Extensions

2.57 The Sustainable Urban Extensions set out in Figure 9 will continue to create new neighbourhoods in Northampton, providing housing and community facilities to meet the needs of current and future residents. Constraints include the wider impact on and from arterial routes to and from these developments.

Figure 9: Sustainable Urban Extensions within the Northampton Related Development Area



Strategic Rail Opportunities

2.58 As part of efforts to ensure that Northampton can play a full role in the development of the Oxford – Cambridge Corridor, ~~the Borough West Northamptonshire Council~~ is seeking to maximise opportunities to increase the connectivity and range of destinations served by rail. Outside ~~the Borough Northampton~~, work has started on construction of High Speed 2 (HS2), which will provide a high speed rail link between London and Birmingham initially, with a later phase proposed to link further to Leeds and Manchester. An advantage of HS2 for Northampton, which the Council supports, is that this offers potential to release capacity on the West Coast Main Line (WCML), with the possibility that new service patterns could be introduced, perhaps including fast, long distance services calling at Northampton, increasing the range of destinations available. Network Rail is investigating opportunities for these new service patterns, including the provision of "open access" services.

2.59 Preparatory work is also underway for East West Rail, linking Oxford with Cambridge. With ~~Northampton Borough~~ ~~the~~ Council's active support as part of the East West Rail Consortium, England's Economic Heartland (the local subnational

transport body) is pressing for Network Rail's work on releasing capacity on the WCML to consider the opportunity to develop direct services on the Northampton – Milton Keynes – Aylesbury - High Wycombe – Old Oak Common axis, as well as destinations beyond, further widening the range of rail connections for Northampton. It should be noted that the East – West Rail Phase 1 western section is complete (Oxford to Bicester) and Phase 2 central section was approved by the Secretary of State for Transport on 4 February 2020 allowing main construction work to start.
<https://www.networkrail.co.uk/running-the-railway/railway-upgrade-plan/keyprojects/east-west-rail/>

2.60 A further opportunity to improve links from the north to Northampton and more widely to the Oxford – Cambridge Corridor is presented by the possibility of providing new transport links along the alignment of the former Northampton to Market Harborough railway line. This is potentially an important contribution to wider growth aspirations associated with the Oxford – Cambridge Corridor, as well as opening up possibilities to connect with services for East Midlands Airport.

CHAPTER 3: VISION AND BOROUGH OBJECTIVES

Vision

3.1 The Vision provides an indication of what Northampton would be like by 2029, not just in terms of its physical landscape, but also how its role in meeting the needs of residents, investors and visitors will have evolved.

3.2 This Vision draws on the version included in the West Northamptonshire Joint Core Strategy but has been amended to reflect the characteristics that are more particular and current to Northampton. The Vision also takes into account the comments submitted in earlier Local Plan consultations.

Vision

By 2029 Northampton will be the heart of West Northamptonshire, playing a key role in the Oxford – Cambridge Corridor. 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 its communities. Services, facilities and infrastructure will also support communities, adding to the quality of life and supporting residents and visitors. Based upon a thriving mixed economy and associated services, it will be a place where history, innovation and regeneration are mutually supportive. There will be continuing pride in the Royal and Derngate Theatres, museums including the Northampton Museum and Art Gallery, and professional sports teams such as Northampton Town Football Club, Northampton Saints Rugby Club and Northamptonshire County Cricket Club. Northampton will have strengthened its role as the leading social centre within the county for cultural, commerce, leisure and entertainment, employment and health. Through the University of Northampton, there will be first class and modern learning activities and facilities to be proud of.

Northampton will be a great UK location for a range of employment opportunities, as well as achieving high levels of proficiency in both academic and vocational education. The Borough of Northampton will build on its economic strengths, including its location at the heart of the county and in the Oxford – Cambridge Corridor and as a prime area nationally for high performance engineering and as a logistics and distribution centre.

Northampton will blend high quality design choices with outstanding public open spaces, distinctive historic character, an enhanced riverside setting and a network of green spaces and high-quality parks including a network of biodiversity rich greenspaces. Areas of semi-natural green space will be easily accessible, which is

important for people's health and wellbeing, whilst being protected and enhanced where appropriate.

New development in Northampton will respond directly to the challenge of climate change. In so doing, the Borough Northampton will be a leading example of low environmental impact, with gains made wherever possible. Development will be resilient to the impacts of climate change and, wherever possible, adverse impacts will be mitigated.

Northampton will be better connected and have a sustainable and highly accessible transport network that is recognised locally, regionally and nationally.

Borough Strategic Objectives

3.3 The strategic objectives are based on those in the West Northamptonshire Joint Core Strategy Local Plan Part 1, but they have been updated to take into account consultation responses to date and more recent evidence.

The objectives are:

Objective 1 – High quality design and Place Shaping

To achieve high quality design that takes account of and improves local character and heritage and provides a safe, healthy and attractive place for residents, visitors and businesses.

Objective 2 – Housing

To provide a range of housing in sustainable locations, seeking to ensure all residents have access to a home they can afford (with a suitable standard of residential amenity), and that meets their needs.

Objective 3 – Supporting the town centre

To drive the regeneration of Northampton's town centre and improve visitor and investor experience by making it the focus of social networking, where people have access to commerce, leisure and culture, heritage, wide ranging employment opportunities and retail options at the heart of Northamptonshire in an attractive environment. To improve accessibility into the town centre to increase its attractiveness as a destination of choice.

Objective 4 – Economic advantage

To strengthen and diversify Northampton's economy by taking advantage of our internationally well-placed location, strategic transport network and proximity to London and Birmingham. To capitalise on the opportunities offered by the Oxford to Cambridge Arc.

Objective 5 – Specialist business development

To support and develop opportunities for specialist employment clusters and business development focused on a low carbon economy. To maximise the opportunities offered by a regenerated town centre and the Enterprise Zone.

Objective 6 – Heritage

To conserve, and where possible, enhance through carefully managed change, the heritage assets and their settings, and to recognise and elevate their role in providing a sense of place and local distinctiveness.

Objective 7 – Protecting and building communities

To ensure new development in urban areas actively supports and links new and existing communities physically and socially, to achieve social cohesion, maintain or improve the existing residential amenity and address the areas of deprivation identified in parts of the ~~Borough~~ Northampton.

Objective 8 – Public Health

To promote healthier and safer communities by supporting the creation of and protecting shared facilities, improving connectivity and securing high quality design, and to maintain or improve the existing residential amenity.

Objective 9 – Educational attainment

To raise educational achievement and the skills base of our communities through supporting the development of our learning infrastructure and strengthening links between local businesses and local schools, Moulton and Northampton Colleges and the University of Northampton.

Objective 10 – Green Infrastructure

To conserve natural habitats and species, provide net gains in biodiversity and enhance Northampton's Natural Capital and green infrastructure network by

improving existing areas as well as incorporating and designing green infrastructure into large scale major development.

Objective 11 – Connections

To reduce the need to travel, shorten travel distances and make sustainable travel a priority and an attractive option across Northampton by maximising and promoting the use of alternative travel modes. In so doing, the Plan will promote the principal objectives of the Northampton Low Emissions Strategy, combat congestion, reduce carbon emissions and address social exclusion for those who do not have access to a private car. In addition, to ensure a much wider range of destinations will be accessible by direct railway services from Northampton, including some fast, long distance services.

Objective 12 – Climate change

To achieve the vision of Northampton as an environmentally sustainable borough town, where people will, over time, be able to make a transition to a low carbon lifestyle, demand for resources will be minimised and the impacts of climate change will be mitigated and adapted to by:

- Securing radical reductions in carbon emissions
- Promoting sustainable design and construction in all new development
- Ensuring strategic development allocations are located and designed so as to be resilient to future climate change and risk of flooding
- Encouraging renewable energy production in appropriate locations and
- Ensuring new development promotes the use of sustainable travel modes

Objective 13 – Infrastructure and Development

To protect and enhance local services and to ensure social, physical, green and technology infrastructure is adequately provided to meet the needs of people and business in a timely and sustainable manner in response to regeneration and new development. To ensure that the relevant utilities are provided prior to occupancy.

CHAPTER 4: SUSTAINABLE DEVELOPMENT

Overview

4.1 An aim of this local plan is to ensure that the growth requirements for Northampton are met in a sustainable manner. This means that Northampton's needs, including those for housing, jobs, retail and leisure, should be met in such a way as not to adversely impact on its built and natural environmental assets.

4.2 Sustainable development has three dimensions – economic, social and environmental. This is reflected in the National Planning Policy Framework and the West Northamptonshire Joint Core Strategy. This Plan's policy for the presumption in favour of sustainable development takes those policies into account.

POLICY 1

PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

- A.** When considering development proposals in Northampton, the Council will maintain a positive and flexible approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The Council will always work proactively, and be sufficiently flexible, with applicants jointly to find solutions and respond to rapid change. This means that sustainable development proposals will be approved and developments that improve the economic, social and environmental conditions of the area can be secured.
- B.** Planning applications that accord with the policies in this Local Plan (and, where relevant, with other development plan policies) will be approved without delay, unless material considerations indicate otherwise.
- C.** Where there are no policies relevant to a planning application or relevant policies are out of date at the time of making the decision, then ~~Northampton Borough~~ ~~the~~ Council will grant permission unless material considerations indicate otherwise. The Council will take into account whether there are any adverse impacts of granting permission which would significantly and demonstrably outweigh the benefits, when assessed against the National Planning Policy Framework.

**Delivering WNJCS:
Policy SA (Presumption in favour of Sustainable Development)**

CHAPTER 5: QUALITY OF NEW DEVELOPMENT

Place Making and High-Quality Design Principles

5.1 Good design is fundamental to the creation of high-quality places in which to live and work. Good design is indivisible from good planning. High quality places are formed from the combination of well-designed buildings and spaces with good connections between them, that can endure, are distinctive, and can allow communities to flourish, are environmentally sustainable and connect physically and socially with the surrounding area. As such, good design is key to achieving sustainable development. It is for this reason that the Local Plan Part 2 contains robust and comprehensive policies that set out the quality of development that will be expected. High quality and sustainable design can also deliver benefits for healthy living by supporting more active lifestyles, providing places for social interaction, and enabling interaction with nature, which all help benefit physical and mental health. These facilities should be designed in a manner which will be easily accessible by the local population by walking and cycling or by using public transport. Well designed and built homes and, commercial buildings and neighbourhoods also have legacy benefits as they often retain their general appeal, value and marketability throughout their lifetime. New residents and businesses are more likely to take pride of place and support efforts to help maintain and invest in the buildings and neighbourhoods if they are of high-quality design and build at the outset.

5.2 The integration of high-quality design with existing development need not be at the expense of innovation.

5.3 Northampton has a rich and distinctive built and natural environment which helps to give Northampton the borough its identity. However, the Northampton Urban Design Appraisal 2016 identifies that Northampton's local distinctiveness has not always been positively incorporated into developments because of a lack of attention to design quality. By conserving and complementing the best of Northampton's the borough's built and natural environment, through high quality design, the town will become a more attractive, inclusive, healthy place for people to live and work, and be more attractive to businesses wishing to invest in the borough.

5.4 Accordingly, policies in this Plan must ensure that a distinct sense of place and high environmental quality is incorporated into new development.

5.5 All development should be well designed and of a high quality, meeting urban design principles outlined in The Design Companion for Planning and Placemaking¹⁵, and Active Design, the National Design Guide¹⁶and the National Model Design Code.

¹⁵ Design Companion for Planning and Placemaking (Urban Design London 2017)

¹⁶ National Design Guide (Ministry of Housing, Communities & Local Government, 2019)

The Council also believes that meeting Building for a Healthy Life criteria helps achieve urban design principles. Building for a Healthy Life (BfHL) is a national standard for well-designed homes and neighbourhoods. There are 12 considerations or criteria which need to be taken into account in the areas of design and placemaking. The 12 considerations include elements such as natural connections, well defined streets and spaces, and green infrastructure. To be eligible for a Building for a Healthy Life commendation, a development needs to secure at least 9 green lights out of the 12 considerations and no red lights). The Council supports the use of this guidance to help structure pre-application discussions with applicants. BfL, or a successor standard as well as other relevant guidance, including the Design Companion for Planning and Placemaking, National Design Guide and Active Design¹⁷ to help structure pre-application discussions between local communities, the Council and the developer of a proposed scheme.

5.6 In addition, the developer should also look at passive design when considering the details of their proposals. Passive design takes into consideration how the climate can be used to maintain a comfortable temperature range within a home. If designed carefully, the scheme should reduce or eliminate the need for auxiliary heating or cooling. The concept of passive design can be found through, for example, orientation and window placement, where these are arranged so as to minimise summer heat gain and maximise winter heat gain. Room layouts can be designed in a manner which capitalises on natural light.

¹⁷ <http://www.sportengland.org/facilities-and-planning/design-and-cost-guidance/active-design/>

POLICY 2

PLACEMAKING AND DESIGN

- A. Development should be designed to promote and contribute to good placemaking through high quality, ~~innovative~~ beautiful and sustainable design which encourages the creation of a strong, locally distinctive sense of place by:
- i. Being well designed for the intended use(s), attractive and adaptable to future requirements throughout its life
 - ii. Incorporating a mix of easily accessible facilities for day to day living and enabling ~~that enables~~ community interaction and cohesion, or providing easy and inclusive access to those facilities nearby
 - iii. Creating healthy environments that prioritise people walking and cycling to reach local facilities and facilitate recreation.
 - iv. Responding to and enhancing locally distinct townscape, landscape and historic environment characteristics
 - v. Retaining, enhancing and creating important views and vistas into, out of and through the site responding to topography and landform where such opportunities arise
 - vi. Sustaining, protecting and enhancing heritage and natural environment assets, including non-designated assets and setting and those included on Local Lists as well as those already statutorily protected.
Additionally, future development must not leave these assets vulnerable to risk and, wherever possible, should promote the use, understanding and enjoyment of the historic and natural environments as an integral part of good placemaking
 - vii. Having regard to safeguarding or enhancing the setting of locally distinct places, including those found in Conservation Area Appraisals, in terms of scale, design, landform and integration within the existing local context to protect their identified important and unique characteristics based on sound, consistent analysis
 - viii. Including attractive, safe and inclusive high quality public realm ~~for streets and public spaces~~ incorporating features such as public art as an opportunity to reinforce and enhance legibility, character and local distinctiveness
 - ix. Incorporating mixed-use buildings, taking amenity into account
 - x. Ensuring plans for long-term maintenance are in place

- B. To assist in the achievement of good placemaking, new developments should be designed to:

~~Incorporate sustainable design at the beginning of the development process~~
~~Ensure safety, security, amenity, accessibility and adaptability~~

- i. Have full regard to the needs for security and crime prevention, with crime prevention measures incorporated into the site layout and building design
- ii. Ensure residents' privacy and adequate levels of sunlight and daylight
~~Be as sustainable as possible and constructed in a sustainable fashion~~
- iii. Incorporate Design Coding (in the case of major developments) to ensure consistency of design approach
- iv. Ensure that buildings are designed to be resilient in the future taking into account the impacts of climate change
- v. Ensure that buildings' form, massing and façades create character and visual interest
- vi. Use high quality and durable materials
- vii. Include windows and active frontages overlooking the public realm
- viii. Use passive design principles where appropriate
- ix. 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
- x. Incorporate green roofs and living walls into the building design where possible
- xi. Ensure that public, open or green spaces are overlooked by houses to ensure that they are safe spaces; and
- xii. Ensure that new streets are tree lined unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate.
Achieve the Building for Life certification

~~Opportunities for the provision of street trees and soft landscaping should be taken and subject to the other criteria of this policy.~~

- C. For proposals for major development, a Building for a Healthy Life assessment, or an assessment against equivalent criteria, should be included in the Design and Access Statement to demonstrate that the proposal is capable of achieving a Building for Healthy Life commendation, or an equivalent standard.
- D. 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 and take the available opportunities to enhance their surroundings.

Delivering WNJCS:
Policy C2 (New Developments)
Policy N1 (The Regeneration of Northampton)

5.7 To complement the placemaking policy, it is necessary to have detailed design criteria as set out in Policy 3.

POLICY 3
DESIGN

To assist in the achievement of good placemaking, new developments should be designed to:

- Incorporate sustainable design at the beginning of the development process
- Ensure safety, security, amenity, accessibility and adaptability
- Have full regard to the needs for security and crime prevention, with crime prevention measures incorporated into the site layout and building design
- Ensure residents' privacy and adequate levels of sunlight and daylight
- Be as sustainable as possible and constructed in a sustainable fashion
- Incorporate Design Coding (in the case of major developments) to ensure consistency of design approach
- Ensure that buildings are designed to be resilient in the future taking into account the impacts of climate change
- Ensure that buildings' form, massing and façades create character and visual interest
- Use high quality and durable materials
- Include windows and active frontages overlooking the public realm
- Use passive design principles where appropriate
- 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
- Incorporate green roofs and living walls into the building design where possible
- Ensure that public, open or green spaces are overlooked by houses to ensure that they are safe spaces; and
- Achieve the Building for 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.

Delivering WNJCS:
Policy C2 (New Developments)
Policy N1 (The Regeneration of Northampton)

Amenity and Layout

5.8 External private space is important in creating homes that meet people's needs (with a suitable standard of residential amenity with regard to noise and air quality) and support appropriate living conditions. External private spaces should be proportionate to the size of the dwelling and the expected make-up of the household that is likely to occupy it. External private space should enable occupants to enjoy their home, allowing place for play and socialising and catering for domestic needs, such as storage of refuse, drying clothes, storing bicycles and other items typically too large to be comfortably stored within the dwelling. Flatted accommodation will also be required to make adequate provision for external private space. Where this is not possible, communal external space should be designed to maximise amenity for users, with careful design of communal refuse storage and cycle parking areas.

5.9 When converting a property into a house in multiple occupation, the landlord/property owner must provide acceptable standards, for example, for room sizes, lighting and internal layout. In addition, internal space standards within new dwellings play an important part in ensuring that the resident's quality of life and wellbeing are appropriately considered. Space standards are intended to ensure that new dwellings provide a reasonable level of internal space to undertake day to day activities at a given level of occupancy. The Nationally Described Space Standard (NDSS) deals with internal space within new dwellings and is suitable for application across all tenures. 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 NDDS.

POLICY 4 AMENITY AND LAYOUT

Development will be required to create and protect a high standard of amenity for occupiers. In particular new development should ensure:

- i. New development is not overbearing upon existing buildings or open spaces
- ii. 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

- iii. The outlook and visual amenity afforded from within buildings and private / communal garden areas should be satisfactory taking account of the relationship with neighbouring buildings and the wider street scene, including the design of parking, boundary treatments and landscaping
- iv. Shared circulation space and routes to private entrances within flatted development should be welcoming, and be naturally lit wherever possible
- v. ~~Provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards, or successor guidance~~
- vi. There is adequate access to both high quality recreational and semi-natural green spaces for all residents
- vii. That ~~large~~all developments include high-quality public realm
- viii. There are adequate facilities for the storage of bins, including recycling, which are effectively designed for ease of use, access and layout

Delivering WNJCS:

Policy H1 (Housing Density and Mix and Type of Dwellings)

Policy H2 (Affordable Housing)

Policy H5 (Managing the Existing Housing Stock)

Policy N2 (The Regeneration of Northampton)

Climate Change, Sustainable Design and Construction

5.10 Climate change in the future is expected to increase frequency and intensity of extreme weather events. The response to climate change is one of the greatest challenges facing the country. The National Planning Policy Framework sets out that the planning system should support the transition to a low carbon future, in a changing climate and support renewable and low carbon energy, by taking a proactive approach to mitigating and adapting to climate change.

5.11 Northampton is experiencing shorter, milder winters, but increasing incidents of extreme weather events, the most notable of these include the Easter floods of 1998. More recently, parts of Northampton suffered from surface water flooding in 2018. The Northampton Borough Council has declared a Climate Emergency. West Northamptonshire Council and is committed to making Northampton carbon neutral by 2030.

5.12 The core principles of sustainable design and construction are reflected in a number of policies within the WNJCS. In particular Policy S10 seeks to reduce the impact of climate change through sustainable development principles. WNJCS Policy S11 seeks greater energy efficiency in the building construction stage and the implementation of low carbon and renewable energy.

5.13 In the light of the Climate Emergency, this Local Plan must ensure that Northampton develops in the most sustainable way possible. This means delivering our social, economic and environmental aspirations without compromising the environmental limits of Northampton for current and future generations. For this to be achieved, development proposals must embrace sustainable development principles, including minimising their environmental impact.

5.14 This section of the Plan addresses the challenge of mitigating and adapting to climate change, and other resource management issues. Climate change mitigation focuses on designing new communities and buildings to be energy and resource efficient, using renewable and low carbon energy generation and promoting patterns of development that reduce the need to travel by less environmentally friendly modes of transport. Climate change adaptation focuses on ensuring that new developments and the wider community are adaptable to changes in climate. For Northampton, climate change may involve an increase in the urban heat island (UHI) effect due to increasing temperatures, and an increase in flooding, both from rivers and from surface water after periods of intense rainfall. Policies are included to address these points.

5.15 Following the Government's housing standards review which rationalised the large number of codes, standards, rules, regulations and guidance and subsumed the Code for Sustainable Homes into Building Regulations, the Council cannot implement the Code for Sustainable Homes in full. However, the Council can set and apply policies which ensure compliance with national standards. Policy H4 of the WNJCS set out that residential development must be designed to provide accommodation that meets the requirements of the Lifetime Home Standards.

5.16 The Government is working towards the implementation of Future Homes, a new set of standards for residential development which, by amending Part L of the Building Regulations, should dramatically improve the energy performance of new dwellings.

5.17 It is increasingly recognised that one of the most important factors in delivering a successful development scheme is ensuring that sustainability is integrated into the design from the outset. This tends to lead to better design and lower lifetime cost, as options are greater at an early stage and there is more scope to identify options that achieve multiple aims. For this reason, Policy 5 requires that, for all major developments, a Sustainability Statement is included as part of the Design and Access Statement for submission with the planning application. A Sustainability Statement may also include Embodied Carbon Construction Calculations and whole-life costing in design and procurement processes. Sustainable design and construction takes into account the resources used in construction, the environmental, social and economic impacts of the construction process and how buildings are designed and used.

5.18 The choice of sustainability measures and how they are implemented may vary substantially from development to development. In addition to the criteria set out in Policy 5 Sustainability Statements should also address how they meet the other sustainability-related policies set out in this Plan.

5.19 There are two scales of renewable energy. It may take the form of building integrated schemes or micro-renewable installations and larger scale strategic projects or infrastructure schemes. As Northampton is a predominantly urban area, the renewable energy potential for Northampton is more likely to consist of Solar PV. These are versatile with deployment possible in a wide range of locations including on domestic and commercial buildings. The UK has seen a significant level of solar PV deployment over recent years and with the major sustainable urban extensions planned for Northampton there is a real potential for detailed design to optimise passive solar gain and, where appropriate, integrated photovoltaics. Also the majority of new buildings are now being designed to maximise the potential for roof top solar gain.

5.20 The greatest reductions of CO₂ will be achieved by reducing energy use and improving energy efficiency but also increasing the proportion of energy from renewable energy. The potential energy resource from renewable technologies in Northampton can make a contribution to reducing carbon emissions from fossil fuels.

POLICY 5

CARBON REDUCTION, COMMUNITY ENERGY NETWORKS, SUSTAINABLE DESIGN AND CONSTRUCTION, AND WATER USE

- A. Applications for major development, including redevelopment of existing floorspace, must include a Sustainability Statement submitted with their planning application, setting out their approach to the following issues:
 - i. Adaptation to climate change
 - ii. Carbon reduction
 - iii. Water management
 - iv. Site waste management
 - v. Use of materials
 - vi. How the proposals meet all other policies in this plan that relate to sustainability including:
 - a. Biodiversity and ecology;
 - b. Land, water, noise and air pollution;
 - c. Transport, mobility and access;
 - d. Health and wellbeing;

e. Culture, heritage and the quality of the built form

All development proposals should:

- i. Where possible, incorporate decentralised energy networks
 - ii. Ensure that new buildings and refurbishment of existing building stock adopt sustainable construction methods
 - iii. Actively promote energy efficiency and use of renewable energy sources where there is an opportunity to do so.
- B. 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.

Delivering WNJCS:

Policy S10 (Sustainable Development Principles)

Policy S11 (Low Carbon and Renewable Energy)

5.21 The Council is committed to tackling climate change by reducing energy consumption and thereby reducing carbon emissions, through the process of sustainable development and design and the encouragement of the use of low carbon energy technologies such as solar technology on all suitable developments.

5.23 The Environment Agency considers that the area served by Anglian Water, which includes Northampton, is an area of serious water stress. On the recommendation of Anglian Water, Policy 5 includes a requirement for new residential development to achieve the optional higher water efficiency standard set out in Building Regulations.

Healthy and Inclusive Communities

5.24 An important part of wider efforts to achieve sustainable development is to ensure that communities are healthy and inclusive. There are substantial disparities in health and wellbeing between different parts of Northampton the Borough. As part of a wider approach across the health and local government sectors, local plans can play an important role in working to address these disparities and to improve people's health.

5.25 Locally, Northamptonshire's Joint Health and Wellbeing Strategy 2016-2020¹⁸ highlights matters that are specific to the county such as the rapid growth in the number of people aged 70 or over and the relatively high proportion of the population aged under 16 years. It makes it clear that health deprivation is concentrated in urban areas such as Northampton. It sets out a range of measures to reduce health inequalities, some of which can be addressed by local plans. For example, in encouraging people to take responsibility for their health and make informed choices, the strategy has an objective to create spaces, facilities and infrastructure to enable people to make healthier choices by, for example, improving access to leisure facilities, guiding planners on how to help in creating healthy weight and food environments, and reviewing the licensing of unhealthy establishments. Another priority of the strategy is to create an environment for all people to flourish, with objectives to ensure that people have access to leisure spaces, green and natural spaces, recreational facilities and community assets that promote health and wellbeing as well as improving walking, cycling and public transport as part of an integrated transport infrastructure.

5.26 ~~The Northampton Borough Council's Corporate Plan 2018-2020~~¹⁹ ~~has had a~~ strategic priority to achieve resilient communities and one of the ways it sets out to achieve this is to ensure that mechanisms are in place to guarantee inclusion.

5.27 The Council continues to work with healthcare providers, partners and the National Health Service to:

- Ensure the provision of additional and appropriately configured health and social care facilities;
- Identify the anticipated primary care needs of local communities;
- Identify the capacity needs of local communities; and
- Meet the healthcare needs of local communities

5.28 Planning 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: The design of new developments can have an impact on the community's health and wellbeing, through the shaping of the local environment and influencing the lives of the existing and future residents. It is therefore important to ensure that major development proposals include assessments on the impacts of the schemes on the health and wellbeing of the community. One way in which this can be achieved is through a health impact assessment on major development proposals. The applicant should demonstrate how the scheme promotes the provisions outlined below, and how~~

¹⁸ <https://www3.northamptonshire.gov.uk/councilservices/health/health-and-wellbeingboard/Documents/NCC149648%20Health%20Wellbeing%20Board%20Report%20A4%2024pp%20AW2%20NoBleed-Singles.pdf>

¹⁹ <https://www.northampton.gov.uk/downloads/file/10585/corporate-plan-2018-2020>

these would benefit existing and future residents in terms of the impacts on their health and wellbeing. Good design can do this through:

- Physical activity – creating environments that encourage and support people to be active, through active travel, play, informal and formal leisure and sporting activities
- Social interaction – providing facilities and spaces that can be used for formal and informal social interaction and community activity
- Green infrastructure – effective incorporation of multi-functional green infrastructure, providing benefits such as access, play and recreation, attractive environments and wildlife habitat, flooding, climate and air quality management, relaxation and enhanced mental wellbeing
- Streets and public spaces that are safe, interesting and attractive, accessible and not polluted
- Homes – which support health and wellbeing by providing adequate internal and external space, attractive, accessible design and flexible to meet changing needs
- Movement and access – providing infrastructure to encourage and enable access by walking, cycling and public transport
- Food – providing access to healthy food and to local food growing opportunities
- Economy and employment – providing access to employment and learning opportunities and creating workplace environments which support employee health and wellbeing
- Social infrastructure – providing suitable infrastructure to support health and wellbeing, including appropriate healthcare infrastructure
- Hazards – ensuring that hazards to health and wellbeing have been designed out or minimised to an acceptable level.

~~5.29 Health impact assessments enable the identification and assessment of the likely effects that a proposed development will have on the health and wellbeing of the community. By using this, positive health and wellbeing impacts can be maximised and negative health and wellbeing impacts can be avoided and minimised. In order that Health Impact Assessments are proportionate to the scale of a scheme, and hence its potential impacts, with its partners, the Council has developed a Rapid Health Impact Assessment tool for assessing likely health impacts of development proposals of up to 100 dwellings, to be used at the earliest practicable stage of the planning process to influence proposals as they are being developed. It has been designed in such a way as to help meet the objectives of local strategies and plans to improve health and wellbeing including the Northamptonshire Joint Health and Wellbeing Strategy.~~
~~Development proposals for 100 or more dwellings will be expected to include a more substantial health impact assessment to support their application. Applicants for major development schemes of up to 100 dwellings are strongly encouraged to use this tool to support their proposals and demonstrate compliance with Policy 6.~~

Applicants for developments over 100 dwellings will need to complete a full Health Impact Assessment.

POLICY 6

HEALTH AND WELLBEING

- A. The health and wellbeing of communities will be maintained and improved by requiring major development to demonstrate, through an appropriate health impact assessment, that it will contribute to creating an age friendly, healthy and equitable living environment through:
- i. Creating an inclusive built and natural environment;
 - ii. Promoting and facilitating active and healthy lifestyles;
 - iii. Preventing negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality;
 - iv. Providing access for all to health and social care facilities; and
 - v. 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 standards set out in Policy 28 of this Plan; and
 - vi. Use of design tools such as Building for a Healthy Life (BfHL)
- B. The Council will support the provision of health facilities to accommodate primary and secondary needs in sustainable accessible locations which contribute towards health and wellbeing.

~~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 complete a more substantial health impact assessment to support their application.~~

Delivering WNJCS:

Policy RC1 (Delivering Community Regeneration)

Policy RC2 (Community Needs)

Flood Risk and Water Management

5.30 The River Nene and its tributaries are a significant feature of the town, with new development having the potential to increase the risk of flooding from a range of different sources. West Northamptonshire Joint Core Strategy Policy BN7 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.

5.31 The Environment Agency has an overview of flooding from all sources and is the lead on flooding from main rivers, reservoirs and the sea. West Northamptonshire County Council (NCC WNC) is the lead local flood authority (LLFA) and is responsible for the coordination and management of flood risk from surface water and ground water. Since the adoption of the West Northamptonshire Core Strategy, two further documents have been introduced to assist in the reduction of flood risk. ~~The Environment Agency is responsible for flood risk management activities on main rivers across Northamptonshire.~~ The Northamptonshire Flood Toolkit provides details on the relevant agencies and their responsibilities.²⁰

5.32 It is not possible to eliminate all the risk of flooding. The Northamptonshire Local Flood Risk Management Strategy produced by the LLFA, sets out a framework of measures to manage local flood risk. The strategy sets out a collaborative approach to reducing flood risk within Northamptonshire. ~~In addition, within the Upper Nene Catchment for surface water drainage, there is a need to incorporate a 1 in 200 year standard with an additional allowance for climate change to protect against pluvial flooding. The design standard for the Upper Nene Catchment (through Northampton and within the Nene catchment upstream of Northampton) is the 0.5% probability (1 in 200 chance of occurring in any given year) event plus climate change. Surface water attenuation should be provided up to this standard.~~

5.33 In addition, NCC has published its Local Standards and Guidance for Surface Water Drainage (SUDs) in Northamptonshire²¹. 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 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.

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. ~~Anglian Water's SUDs Adoption handbook and the water sector Design and Construction~~

²⁰ <https://www.floodtoolkit.com>

²¹ <https://www.floodtoolkit.com/wp-content/uploads/2017/09/Local-Standards-for-publication-v1.3September-2017.pdf>

Guidance sets out the circumstances in which SUDs features would be adopted by Anglian Water.

5.35 SUDS should be multi-use rather than set aside solely for the purpose of water storage. Building for a Healthy Life states that well designed multi-functional sustainable drainage may incorporate play and recreational opportunities.

POLICY 7

FLOOD RISK AND WATER MANAGEMENT

Proposals that:

- ~~assist in the management of flood risk and ensure flood risk is not increased elsewhere and provide flood risk reduction/ betterment; and~~
- ~~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 documents)~~

~~will be supported.~~

- A. All proposals must demonstrate that they will assist in the management of flood risk, ensure flood risk is not increased elsewhere and provide flood risk reduction / betterment. Proposals must have regard to relevant guidance for flood risk management and standards for surface water produced by the Lead Local Flood Authority and Anglian Water (or successor documents).
- B. For all major development:
 - i. Suitable access must be provided and maintained for water supply and drainage infrastructure
 - ii. Sustainable drainage systems must be incorporated into the design
- C. Surface water attenuation should be provided to the design standard for the Upper Nene Catchment (through Northampton and within the Nene catchment upstream of Northampton) i.e. a 0.5% probability (1 in 200 chance of occurring in any given year) event plus climate change.

**Delivering WNJCS:
Policy BN7 (Flood Risk)**

CHAPTER 6: NORTHAMPTON REGENERATION STRATEGY

The role of the Town Centre

6.1 Local Plans continue to play a key part in supporting the role that town centres perform at the heart of the communities and this is emphasised in the current National Planning Policy Framework (NPPF). The superseded 2012 NPPF sought to support town centres to generate local employment, and promote beneficial competition within and between town centres. However, there is now a degree of recognition that the role of town centres may be changing due to the nationwide changes associated with changing spending patterns and the impact of technology on shopping behaviours.

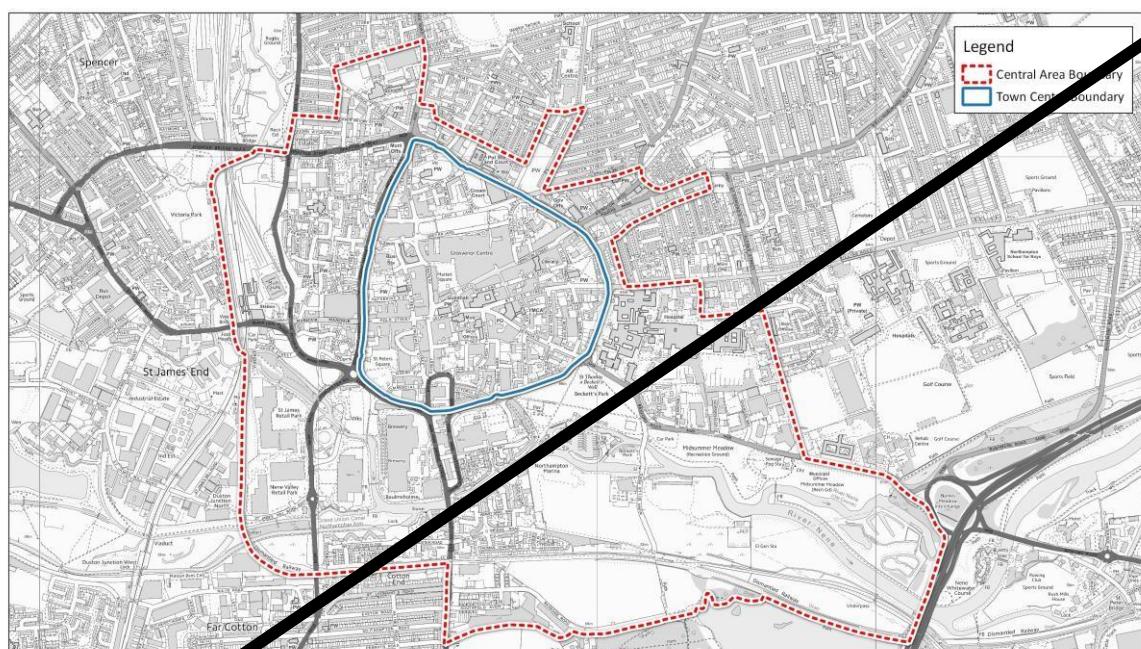
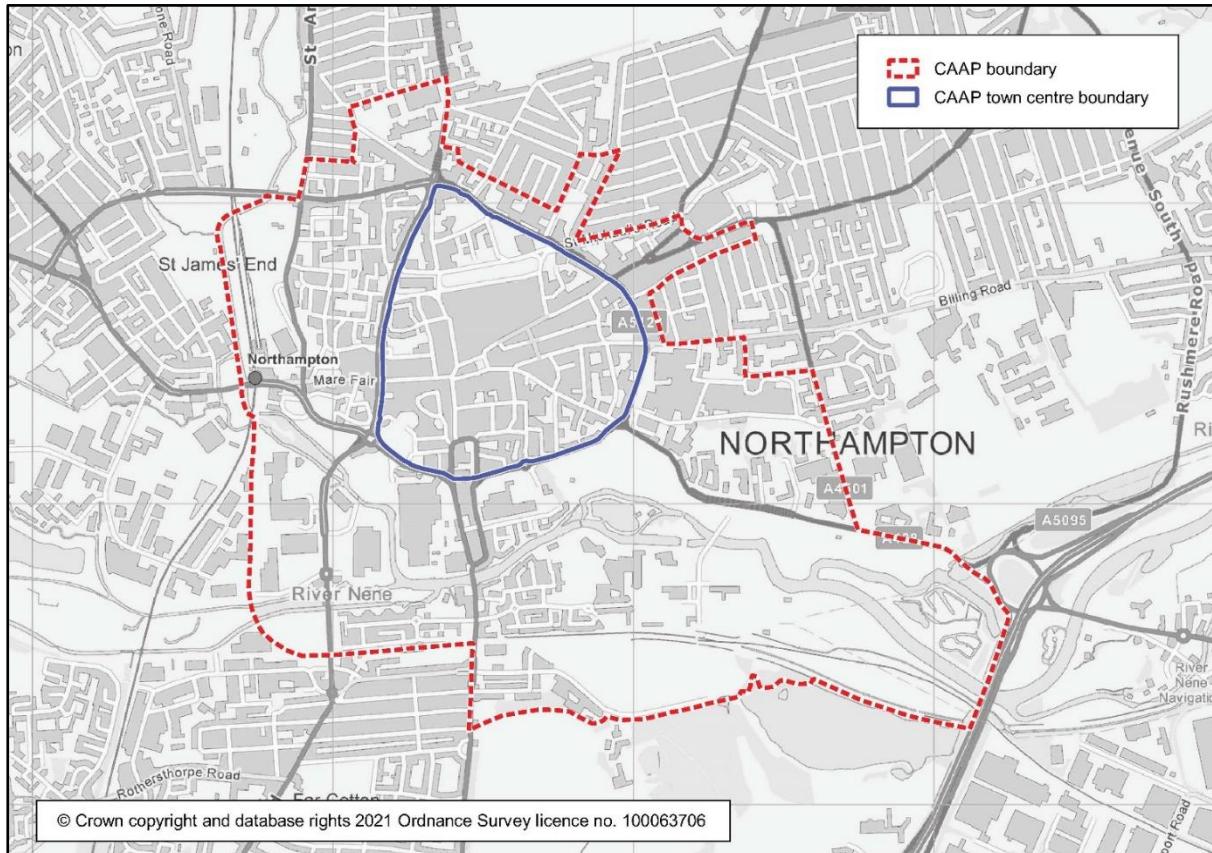
6.2 Planning policies should therefore take a positive approach towards town centre growth, management and adaptation. This emphasises the critical point that the roles of town centres are changing and the plan needs to provide a degree of flexibility which will allow the town centre to adapt accordingly and grow in accordance with the needs of the investors, visitors and residents. Northampton town centre has opportunities and the potential to adapt to these changes. There are opportunities for growth within development sites including the former Greyfriars Bus Station. The potential exists to capitalise on the town centre's heritage, cultural offer, the Enterprise Zone, proximity to bus and train stations and the existence of a University within the Central Area.

6.3 Northampton's Central Area incorporates the town centre and its immediate surroundings (see Figure 10).

6.4 The West Northamptonshire Joint Core Strategy identified the town centre as a regional town centre, stating that Northampton is the largest urban area and the main commercial, administrative, cultural and retail centre for Northamptonshire.

6.5 The Joint Core Strategy adds that Northampton has a particular influence across Northamptonshire and due to its size, function and location in the national context, the town will continue to generate and attract in-migration. Joint Core Strategy Policy N1 states that the regeneration of Northampton will be supported by a range of measures including a focus on Northampton's town centre and Central Area for office, retail, leisure and service development providing high quality urban design and public realm and protecting its heritage assets and historic character.

Figure 10: The Central Area and the Town Centre boundaries



Central Area and Town Centre Boundaries

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Date: 03-12-2018

Scale: 1:10,000

Drawn by: -----

6.6 Northampton's Retail and Leisure Study²² concluded that Northampton town centre is, on the face of it, performing well, with a strong leisure sector. It is particularly well provided for in terms of retail, leisure and financial/ business services, which have grown substantially as a proportion of the centre's units and floorspace since 2010, responding to changing shopper demands for a centre that seems to cater well for both the resident population and the wider region. As a primary designated centre within Northamptonshire the ~~borough~~ and a Regional Town Centre, Northampton is ideally placed to respond to the ever-evolving retail market and changing shopping habits. However, it also notes that the town centre faces particular challenges in terms of the loss of large retailers, vacancies being concentrated in certain areas and consisting of large units and that the town would benefit from improvements to the public realm with suggestions for further branding areas that currently appear somewhat disconnected.

6.7 The study also recommended that the Council continues to support the town centre's cultural activities, leisure and retail services to accommodate its changing role to a more experience-focused destination. This is in light of the general trend for future town centres which is heading towards a more flexible, mixed use offer, with a particular focus towards leisure and "experience" based trips. The study added that retail shopping is expected to remain an important function of centres but will evolve into more of an ancillary offer, with stores operating as curated showrooms and exhibition spaces offering information and advice to complement online shopping with both click-and-collect and home delivery providing an "omni channel" retail experience.

6.8 Northampton town centre, and the Central Area do, however, have a number of opportunities. They accommodate some very important heritage assets that give the town centre a distinctive identity, including the Scheduled Monument relating to the former Northampton Castle, several conservation areas and a number of listed buildings. The recent move of the University of Northampton to a new campus close to the town centre means that there is a new sector of potential consumers now using the town centre. Opportunities also exist to turn the town centre into a connected centre with high speed broadband facilitating new ways of working and doing business.

6.9 In the light of the above, Northampton town centre has the opportunity to recast itself as a historic town centre with attractive places to work, live and spend leisure time rather than trying to compete with the more traditional large scale retail offer at Central Milton Keynes and Rushden Lakes.

²² Northampton Retail and Leisure Study, Nexus Planning, (September 2018)

Central Area Regeneration

6.10 The West Northamptonshire Joint Core Strategy acknowledges the importance of the town's Central Area in accommodating a variety of town centre uses such as offices, retail and leisure as well as providing homes. In particular, the Northampton Waterside Enterprise Zone is considered to be the area that will act as a catalyst to accelerate growth and regeneration opportunities.

6.11 The Retail and Leisure Study recommended that the Local Plan allocate a range of suitable sites to meet the scale and type of development likely to be needed over the next 10 years. Sites like the former Greyfriars bus station, Market Walk and Sol Central were considered to have potential for development and refurbishment. It was recommended that any future Masterplan or strategy should assess the potential for delivery and occupation of these sites for retail and alternative uses. The Study also recognised that residential development often plays an important role in ensuring the vitality of town centres and therefore encourages this use on appropriate sites. In addition, economic growth in the town centre will also attract and retain a greater number of graduates²³. A strategy which actively promotes and supports investment in regeneration will contribute to the attraction of the town centre and subsequent growth in student retention.

6.12 Within the town centre and the wider Central Area, there are prime sites which provide opportunities to deliver a range of town centre uses as well as provide additional housing to meet local housing needs. The Central Area has six designated Conservation Areas - St Giles, Holy Sepulchre, All Saints, Derngate, Billing Road and the Boot and Shoe Quarter. There are also other heritage assets which will need to be taken into account when considering development proposals.

6.13 In addition, ~~West Northamptonshire~~ Northampton Borough Council, with its partners on the Northampton Forward board (an informal partnership made up of ~~executives from the Borough Council, County Council, South East Midlands LEP, University of Northampton, private business representatives, Northamptonshire Chamber of Commerce and Northampton Town Centre Business Improvement District~~), has decided to take action in addressing the challenges facing the town. The strategic objectives are identified in the consultation process are:

- a. Addressing an over reliance on retail
- b. Infrastructure challenges
- c. Safety concerns of residents
- d. Poor quality commercial space
- e. Poor quality of public realm
- f. Levels of vacant units
- g. Increasing footfall and activity

²³ The Great British Brain Drain (Centre for Cities, November 2016)

h. Locate alternative housing sites

6.14 Building on some of the recommendations of the Retail and Leisure Study, Northampton Forward has produced a Masterplan covering the town centre, and the main gateway route into the town centre from the west. The Masterplan identifies a series of catalyst projects, within long term strategic objectives, which are intended to set the tone for the future direction of Northampton's town centre. It identifies challenges in terms of vacancy rates for shop units, now over 15%, the relatively high proportion of discount / value retailers (34%), low levels of high quality office space in the town centre, low levels of residential and office uses in the town centre and a recent survey identifying the town centre as having the sixth most unhealthy high street in the country²⁴. This Masterplan is being used to bid for the Future High Street Fund which, if successful, will secure the funding necessary to meet the aims for the town centre. The consultation on the plan concluded that stakeholders are broadly supportive of the proposed changes.

6.15 The town centre masterplan focuses on 5 opportunity areas:

1. The Arrival: Marefair and Gold Street
2. Market Square, the heart of the town
3. Greyfriars
4. Fish Street and St. Giles Street
5. Abington Street

6.16 Policies 8 and 9, below, set the context the context for proposals across the town centre and the wider Central Area.

POLICY 8 SUPPORTING NORTHAMPTON TOWN CENTRE'S ROLE

In the town centre, as defined on the policies map, the Council will continue to support proposals and schemes which contribute positively towards the range of retail, leisure and service-based offers and the town's regeneration. In particular, schemes which provide a balanced mix towards meeting the requirements for town centre uses and housing delivery whilst respecting and enhancing the heritage assets will be welcomed. The achievement of a highly digitally connected centre, to accommodate the changing role of Northampton's town centre and to improve visitor experience, will also be supported.

²⁴ Health on the High Street – Royal society for public health, 2018

Delivering WNJCS:
Policy N1 (the regeneration of Northampton)
Policy N2 (Northampton Central Area)

POLICY 9
REGENERATION OPPORTUNITIES IN THE CENTRAL AREA

The Council will also support the regeneration of sites within the town centre and the wider Central Area, which will deliver opportunities for housing and economic development for the benefit of Northampton's residents and the local economy. In particular, regeneration schemes on the following sites will be particularly welcomed:

- i. Northampton Railway Station – any proposals should conform to Policy 39 this Local Plan
- ii. Four Waterside – any proposals should conform to Policy 44 of this plan
- iii. St Peter's Way – ~~to the south of Gas Street roundabout~~ any proposals should conform to Policy 44 of this plan
- iv. Ransome Road – to the south of the University of Northampton Waterside campus. Any proposals should conform to Policy 43 of this Local Plan.

Delivering WNJCS:
Policy N1 (the regeneration of Northampton)
Policy N2 (Northampton Central Area)

University of Northampton

6.17 The University of Northampton's Waterside campus, which opened in September 2018, is located in the Northampton Waterside Enterprise Zone, covering an area of around 20 hectares alongside the River Nene and is within 10 minutes' walk of the town centre. A relatively new university, Northampton University was formed in 1999 by an amalgamation of a number of training colleges and gained full University status in 2005. Originally based on two campus sites, the new University campus draws all its facilities onto a single, more accessible location, bringing with it over 12,000 students. The presence of the relocated University is likely to be influential in the direction of the economic growth of the town centre and its wider area.

6.18 The Waterside campus provides not just teaching facilities at all levels from undergraduate degrees to doctorate qualifications, it also has facilities which will support students, staff and students' families through the provision of a hotel, student accommodation and sports facilities. The University, its staff, students and

their families therefore make a positive cultural and economic impact on Northampton and its surrounding areas. It has been reported that the institution as a whole has created a £290m boost to the County of Northamptonshire and generated more than 2,700 jobs.²⁵

6.19 The University plays a crucial role in ensuring that Northampton produces graduates with the right skills to contribute towards the town's economy. However, it will also have a major role in attracting investment through housing growth and employment opportunities. Under the outline planning permission, there is approval for up to 35,000 sq.m of commercial (B1) floorspace on the north eastern part of the site.

6.20 It is essential that the University be supported in order to ensure that a ready-made supply of graduates, capable of meeting local labour requirements, is met. In addition, its location in the town centre will contribute to its viability and vitality, because students and their families will be taking advantage of the offer within the area including its cultural, heritage, leisure and retail provision, adding to their investment and growth.

POLICY 10 SUPPORTING AND SAFEGUARDING THE UNIVERSITY OF NORTHAMPTON WATERSIDE CAMPUS

The role and contribution of Northampton University will be supported through the safeguarding of the site for education and ancillary purposes. Any enhancements to the existing facilities, and improved connectivity to the town centre, will be welcomed provided the schemes meet the other requirements of this Plan.

Delivering WNJCS: Policy E6 (Education, Skills and Training)

Tourism and Hotels

6.21 Northampton will capitalise on the tourism sector as part of its town centre strategy supporting the needs generated by the sector, primarily in the accommodation sector. The borough Northampton has a number of facilities which are not just tourist attractions. Some also perform a role in community facility provision, for example, offering venues for special occasions.

²⁵ <https://www.northampton.ac.uk/news/new-jobs-for-northamptonshire-residents-thanks-to-watersidecampus/>

6.22 This principle is embedded in the West Northamptonshire Joint Core Strategy Policy E7, which supports proposals for tourism, visitor and cultural developments provided certain criteria are met. It applies the sequential test by requiring attractions and facilities of a significant scale to be located firstly within town centres, then edge of town centres and then at other locations.

6.23 The Hotel Study²⁶ concluded that the Borough Council could prioritise full service, international brand 3 and 4 star hotels with conference, banqueting and leisure facilities, to help in attracting major national and international companies to the Enterprise Zone and to develop Northampton as a conference destination.

POLICY 11 MANAGING HOTEL GROWTH

- A. Proposals for new hotel development including apart-hotels and serviced apartment complexes will be supported in the following locations:
- i. Within the town centre boundary as defined in the Policies Map
 - ii. Within the Enterprise Zone boundary as defined in the Policies Map

~~Developments for hotels in any other locations which apply the sequential test and demonstrate that the scheme will attract new leisure and business tourism demand without substantially undermining the potential for new hotels to be delivered in the town centre and in the Enterprise Zone will also be supported.~~

- B. Hotel proposals in other parts of the plan area will be the subject of the sequential test.

Delivering WNJCS: Policy E7 (Tourism, Visitor and Cultural Industries)

Regeneration in Areas outside the Central Area

6.24 The West Northamptonshire Joint Core Strategy acknowledges that a combination of factors including the regeneration and reuse of previously developed land and sustainable urban extensions will add high calibre housing, local services and facilities as well as sustainable transport connections to the town centre. It adds that Northampton will be a major regional and cultural economic driver for a wider area. Northampton's regeneration is expected to be supported by a range of measures including a focus on the town centre for commerce, leisure, service and heritage as well as addressing pockets of deprivation in areas such as Spring Boroughs, Kings Heath and Northampton East.

²⁶ Hotel Study (Hotel Solutions, 2016)

6.25 The Retail and Leisure Study recommended that where suitable and viable town centre sites are not available for main town centre uses, the Local Plan should allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre.

6.26 In addition to development opportunities identified through the local plan, Neighbourhood Plans also include policies to address deprivation and encourage regeneration. So far, ~~three four~~ Neighbourhood Plans have been made. They are the Duston Neighbourhood Plan (made 2015), the Spring Boroughs Neighbourhood Plan (made 2016) and the Growing Together Neighbourhood Plan (made 2018) and Great Houghton (made 2022). Three other areas have been designated as Neighbourhood Plan areas – Semilong & Trinity, Queens Park and Great Houghton.

6.27 The eight Sustainable Urban Extensions within Northampton (some of which straddle the borough boundary of the plan area) which have been allocated in the Joint Core Strategy with a view to delivering housing requirements as well as address the shortage of education, support the establishment of local facilities including retail for day to day needs and employment, as well as open spaces.

6.28 Policy N2 of the West Northamptonshire Joint Core Strategy focuses on the Northampton town centre boundary, the Primary Shopping Area and the Central Area (CA). This policy has now been superseded by Policy 12 and Policy 19 of this Local Plan because:

- Policy 12 supports main town centre uses in the town centre. Evidence shows that the role of the town centre is changing and more emphasis should be given to promoting main town centre uses within the town centre boundary. The reference to the Central Area therefore is no longer relevant for main town centre uses
- Policy 19 (Chapter 9) supports the provision of about 8,900sq.m net of convenience retail floorspace, and about 7,300 sq.m of comparison floorspace by 2029. The revised provision is based on updated technical evidence base.

POLICY 12 DEVELOPMENT OF MAIN TOWN CENTRE USES

The Council supports the development of an appropriate mix of main town centre and residential uses in the town centre. ~~and the Central Area~~. Where suitable and viable sites are not available for main town centre uses in the town centre, support

will be given for appropriate edge of centre sites that are well connected to the town centre, and sites within the District Centres and Local Centres.

Delivering WNJCS:

Policy N1 (The Regeneration of Northampton)

Policy N2 (Northampton Central Area)

CHAPTER 7: RESIDENTIAL

Housing Delivery

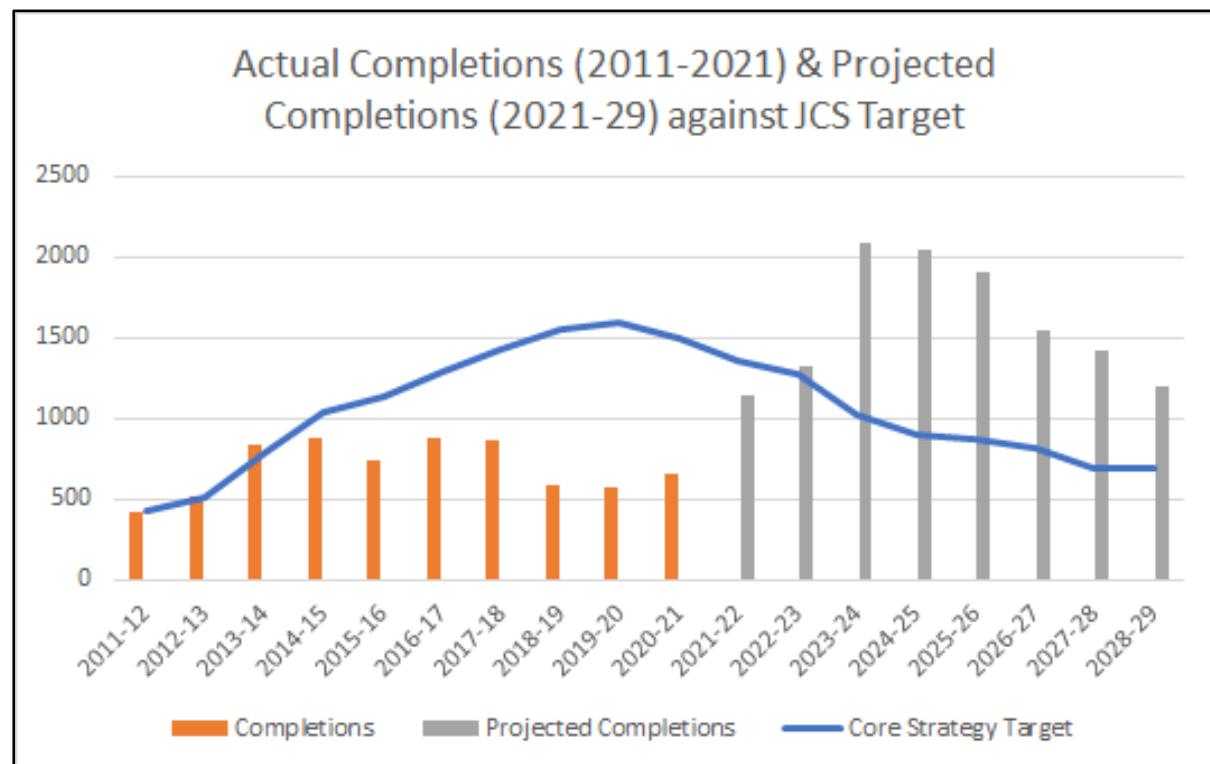
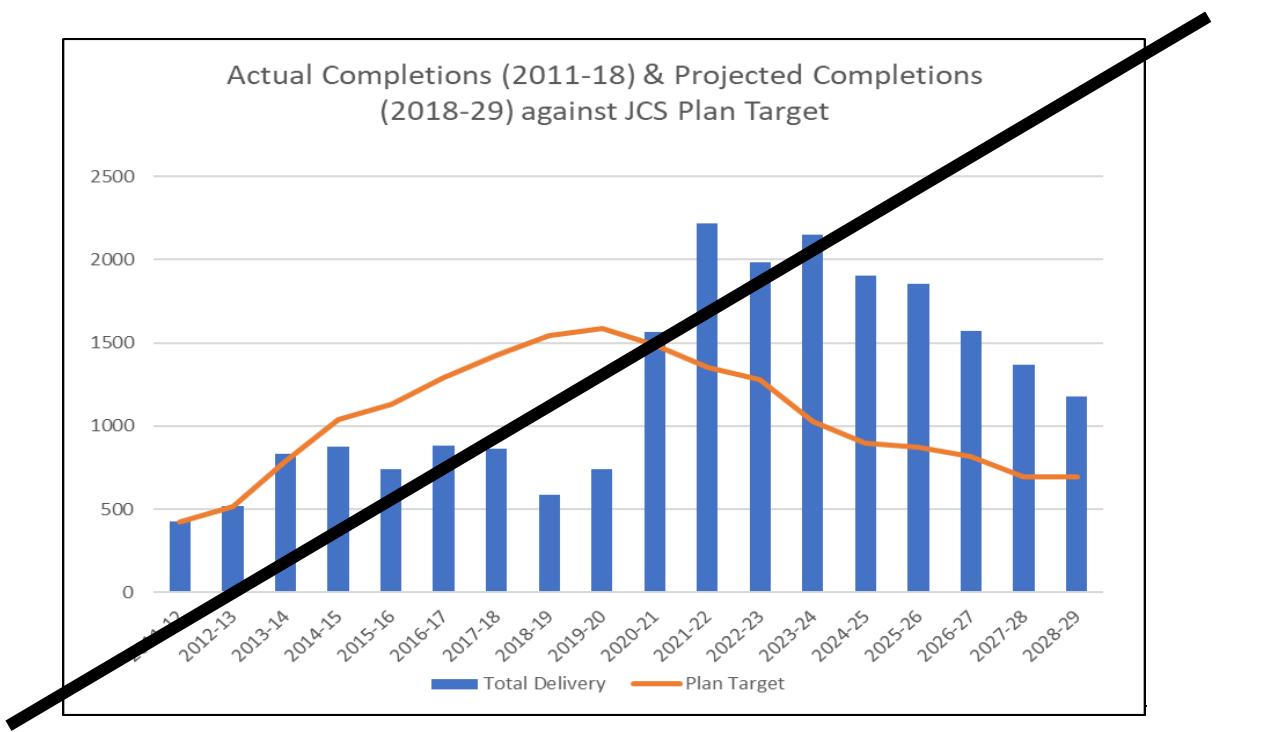
Current Provision

7.1 The West Northamptonshire Joint Core Strategy (JCS) established an objectively assessed need of 25,758 dwellings for Northampton between 2011 and 2029. JCS Policy S3 sets the housing requirement for Northampton Borough from 2011 to 2029 at about 18,870 dwellings. 7073 of these dwellings (37%) are set to be provided in the Sustainable Urban Extensions (SUEs) allocated in the JCS. By 1st April 2021 2019, ~~6,957~~ 5,727 dwellings had been delivered, against a JCS requirement to allocate sufficient sites (allowing for windfall) to accommodate 11,236 ~~8,157~~ new dwellings in Northampton by that time. The number of dwellings delivered by 1st April 2021 2019 falls some ~~4,279~~ 2,430 units short of the delivery trajectory²⁷ set out in the JCS (see Table 6).

7.2 The profile of the JCS delivery trajectory was heavily influenced by economic conditions and intelligence at the time it was being progressed. The trajectory envisaged that between 2014/15 and 2023/24, an annual completion rate of over 1,000 dwellings (peaking at 1,588 in 2019/20) was deliverable. This has not materialised. This is mainly because delivery of new dwellings at the SUEs has been relatively slow. Therefore, it is now expected that not all of the dwellings to be delivered by the SUEs, will be completed before 1st April 2029. Table 6 below shows the housing commitments for the SUEs. Graph 1 illustrates this persistent under-delivery against the JCS proposed housing delivery trajectory. Table 6 below shows the housing commitments for the SUEs. The JCS assumed that all of the SUEs would be fully built out by 1st April 2029, but Table 6 shows that 2,624 dwellings will be delivered after that date.

²⁷ West Northamptonshire Joint Core Strategy (adopted 2014)

Graph 1: Housing delivery in Northampton against the Joint Core Strategy proposed housing delivery trajectory



7.3 Northampton's Five Year Housing Land Supply Assessment for April 2019 shows that Northampton has under-delivered against the JCS target over the last five years.²⁸ It was anticipated that, to accord with the NPPF, a buffer of 20% would have needed to be added to the supply of deliverable sites. However, in 2018, the Ministry of Housing, Communities and Local Government introduced a new methodology for measuring housing delivery.²⁹ The first two Housing Delivery Tests concluded that Northampton Borough passed and therefore only needed a 5% buffer for the first 5 years.³⁰ An assessment of Northampton's five year housing land supply also confirmed that windfall sites of under 200 dwellings have the capacity to generate in the region of 300 dwellings per annum. This is a figure that has consistently been delivered over the last 10 years. It is anticipated that this trend will continue, and potentially increase, in the short to medium term due to Government changes to permitted development rights (which include flexibility for changes of use from employment and other commercial uses to residential).

Table 6: Housing commitments (including Joint Core Strategy allocations), proposed allocations and windfall

	JCS requirement 2011- <u>2021</u> <u>2019</u>	Net completions 2011- <u>2021</u> <u>19</u>	Delivery of dwellings compared to JCS requirement
Total dwellings	8157-11,236	5727-6,957	-2430--4,279

Site name	Status as at 1st April <u>2019-2021</u>	Dwellings completed as at 1st April <u>2019</u> <u>2021</u>	Remaining capacity to 1st April 2029	Remaining capacity forecast to be delivered after 1st April 2029
N5 (Northampton South SUE	Not implemented. Under construction N/2013/1035 (outline permission) and N/2017/1566 Reserved matters for phase 1 – 349 dwellings approved	0	636-1,000	364-0

²⁸ Northampton Housing Technical Paper (Northampton Borough Council, March 2019)

²⁹ Housing Delivery Test measurement rulebook (MHCLG, July 2018)

³⁰ Northampton Housing Technical Paper (Northampton Borough Council, March 2019),

N6 (Northampton South of Brackmills)	Not implemented. <u>Under construction</u> N/2013/0338 (appeal allowed), N/2017/1369 and N/2019/0048	0	1115-911	0-204
N7 (Northampton Kings Heath SUE – Dallington Grange)	Not implemented. N/2014/1929 (live application)	0	2000-950	1000-2,050
N9 (Northampton Upton Park SUE)	Not implemented. N/2011/0997 (outline approval for up to 1,000 dwellings) N/2018/0426 (reserved matters in progress for 860 dwellings)	0 4	861-856	0
N9A (Northampton Upton Lodge SUE)	N/2017/0091 (live application for 1,400 dwellings)	0 33	1347-1,115	53-370

Completions	Existing commitments (as of 1 st April 2019)	Windfall allowance	Sustainable Urban Extensions	LP2 Allocations	Total Delivery	Plan Target
5728	4377	2,400	5959	3,804	22,267	18,873
Difference between Plan Target and Total Delivery						
3,394						

Source	Net additional dwellings
Completions	6,957
Existing commitments as at 1 st April 2021	1,889
Windfall allowance	1,800
Sustainable Urban Extensions	4,832
Allocations	3,838
Total	19,316

7.4 In formulating this local plan, the Council has undertaken a robust Land Availability Assessment. This detailed investigation concluded that the Council had sufficient supply to meet the requirement of about 18,870 net additional dwellings across the plan period to 2029, without over reliance on delivery of housing at the

~~SUE's and therefore complies with Policy S3 of the adopted Joint Core Strategy. In addition, despite the results of the Housing Delivery Test and the changes to Northampton's position on housing delivery, across the five years of the Local Plan (2019/20 – 2023/24), there is still a predicted immediate shortfall.~~

7.5 The following needs to be considered:

- Much of the identified under delivery so far has been the result of slower rates of housing completions in the Sustainable Urban Extensions than anticipated
- The short term housing supply is constrained by the JCS's heavy reliance on large SUEs for substantially meeting Northampton areas the Borough's housing needs
- The Council has researched alternative sites in Northampton the borough exhaustively through its Call for Sites and Land Availability Assessments. There are no other sources of supply that could address this short-term shortfall

7.6 In the face of long term under delivery, which the Council has tried to overcome, it is unreasonable to envisage that historic under delivery against the JCS's proposed housing delivery trajectory can be addressed in the first five years of the Local Plan Part 2, particularly at a time when that same proposed delivery trajectory set out in the JCS sets unprecedented levels of housing delivery.

7.7 The Council has therefore considered it necessary to have a housing trajectory that differs significantly from the proposed housing trajectory set out in the JCS.

7.8 The housing assessment for Northampton Borough concluded that there is sufficient capacity to deliver 22,267 dwellings over the period 2011 to 2029 (this figure includes all planning approvals and commitments, a proportion of homes through the Sustainable Urban Extensions, windfalls and the housing capacity identified through the proposed Local Plan Part 2 developments). The Joint Core Strategy only requires the delivery of 18,873 dwellings over this same period. This means that sufficient capacity has been identified to deliver 3,394 dwellings more than is required by 2029. Further information can be found in the Housing Technical Paper (Northampton Borough Council, May 2020).

7.9 Taking into account the fact that delivery rates have proven to be low since 2011, particularly in Sustainable Urban Extensions, this surplus of 3,394 dwellings has been deducted from the requirement for 2019 – 2024 and a flat rate delivery rate of 1,030 dwellings per year has been applied to those years. This is a conservative approach which allows some contingency in case the SUEs continue to underdeliver,

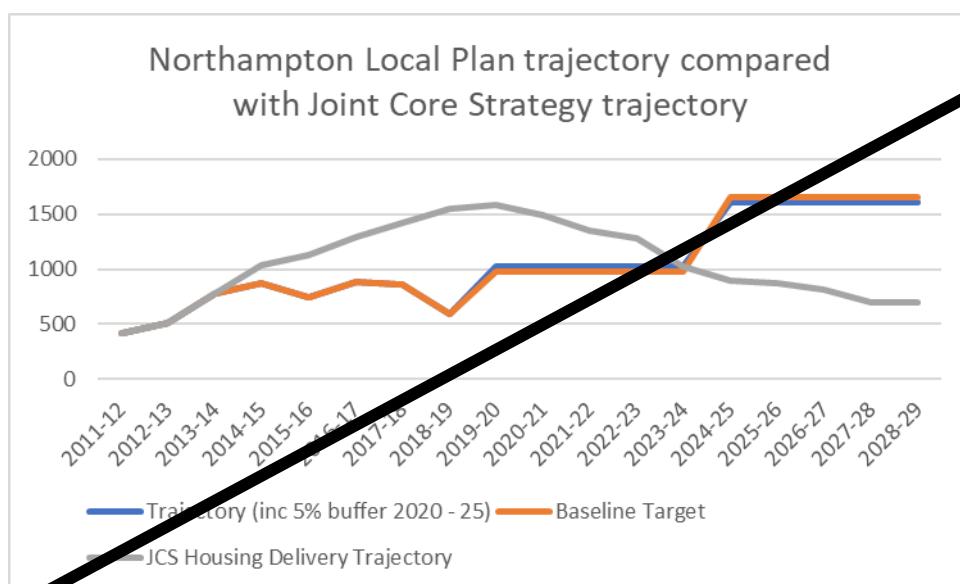
but it is also challenging given that it exceeds previous years' rates of delivery since 2011.

7.10 From 2024/25 onwards, the annual requirement will step up to 1,609 dwellings per year. Clearly, the higher delivery level envisaged for the last five years of the Plan period is ambitious, but this matter can be addressed in the West Northamptonshire Strategic Plan, which is timetabled to have reached adoption in 2022. This will enable an early review of the Northampton Local Plan Part 2 to take place. This revised housing delivery trajectory is set out in Table 7 and Graph 2.

Table 7: Local Plan Part 2 Housing Delivery Trajectory

Year	Trajectory (including 5% buffer for 2019– 2024), dwellings	Baseline Target, dwellings	Proposed Housing Trajectory from West Northamptonshire Joint Core Strategy, 2014, dwellings
2011–12	423	423	423
2012–13	516	516	516
2013–14	834	834	785
2014–15	877	877	1,039
2015–16	739	739	1,132
2016–17	884	884	1,292
2017–18	865	865	1,426
2018–19	673	673	1,544
2019–20	1,030	981	1,588
2020–21	1,030	981	1,491
2021–22	1,030	981	1,355
2022–23	1,030	981	1,278
2023–24	1,030	981	1,025
2024–25	1,609	1,658	900
2025–26	1,609	1,658	875
2026–27	1,609	1,658	815
2027–28	1,609	1,658	695
2028–29	1,609	1,658	694
Total	18,873	18,873	18,873

Graph 2: Northampton Local Plan housing delivery trajectory



7.11 Sites have been allocated in this Plan to deliver about 3,804 3,838 new dwellings. Appendix A shows the trajectory for sites allocated in the Local Plan Part 2, which excludes the SUEs and sites already committed through planning approvals. The sites below are allocated on the Policies Map for housing and residential-led mixed use development.

POLICY 13 RESIDENTIAL AND OTHER RESIDENTIAL LED ALLOCATION

The following sites are allocated for residential and / or residential led development. The capacities identified are indicative only and are dependent on compliance with other policies in this and other development plan documents. Other policies of particular relevance in this plan (non-exhaustive) are indicated.

Reference	Location	Indicative Dwelling Capacity	Relevant policies (non-exhaustive)
0168	Rowtree Road	131	
0171	Quinton Road	19-14	Policy 7 - Flood risk and Water Management
0174	Ransome Road Gateway	24	Policy 7 Policy 31

			<u>BN5 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u> <u>BN9 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
0193	Former Lings Upper School, Birds Hill Walk	60 (5YHLS)	
0195	Hunsbury School, Hunsbury Hill	73 (50 in HLS) 38	
0204	The Farm, Hardingstone	100 55	<u>Policy 30</u> <u>Policy 31</u> <u>BN5 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
0205	Parklands Middle School, Devon Way	132 (5YHLS)	
0288*	Northampton Railway Station car park	68 (5YHLS) 280	<u>Policy 39</u> <u>Policy 31</u> <u>BN5 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
0333*	Northampton Railway Station (railfreight)	200-188	<u>Policy 7</u> <u>Policy 39</u> <u>Policy 31</u> <u>BN5 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
0335	Chronicle and Echo North	42 (6 in 5YHLS)	<u>Policy 31</u> <u>BN5 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
0336	Chronicle and Echo South (rear of Aldi)	14 (5YHLS)	
0338	Countess Road	68 (64 in 5YHLS) Net:4	
0403	Allotments Studland Road	23-	
0629	British Timken	138 (5YHLS) 121	
0657	Fraser Read	140-	
0685	Adj 12 Pennycress Place, Ecton Brook Road	12-	
0719	Car garage workshop, Harlestone Road	35	<u>BN9 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
0720	Ryland Soans garage, Harlestone Road	62	<u>BN9 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
0767	Spencer Street	25 (5YHLS)	<u>Policy 7</u>

0903	Hawkins Shoe Factory, Overstone Road	105 (5YHLS)	<u>BN9 of the West</u> <u>Northamptonshire Joint Core Strategy</u>
0910	379 Harlestone Road	14	
0932	Site 1 Southbridge Road	45 (5YHLS)	Policy 7
0933	Site 2 Southbridge Road	28 50 (5YHLS)	Policy 7
1006	Pineham	80 106	Policy 7
1007	Land south of Wooldale Road, east of Wootton road	16 22	Policy 7
1009	<u>Land west of Policy N5</u> <u>Northampton South SUE (site 1)</u>	100	
1010	Land at St Peter's Way/ Court Road/ Freeschool Street	5	<u>Policy 31</u> <u>BN5 of the West</u> <u>Northamptonshire Joint Core Strategy</u>
1013	University of Northampton Park Campus	585 653 (5YHLS)	
1014	University of Northampton Avenue Campus	170 200	
1022	Belgrave House	122 99 (5YHLS)	<u>BN9 of the West</u> <u>Northamptonshire Joint Core Strategy</u>
1025	Land to the west of Towcester Road	180 230	<u>BN9 of the West</u> <u>Northamptonshire Joint Core Strategy</u>
1026	Eastern land parcel, Buckton Fields	14	<u>BN9 of the West</u> <u>Northamptonshire Joint Core Strategy</u>
1036	Derwent Drive garage site, Kings Heath	8-5	
1037	<u>Swale Drive garage site and rear/ unused land</u>	6 (5YHLS)	
1041	<u>Newnham Road, Kingsthorpe</u>	15-	
1048	Stenson Street	6 2	Policy 7
1049	Land off Arbour Court, Thorplands garage block	11 6	
1051a	<u>Land between Waterpump Court and Billing Brook Road</u>	8	
1052	Land rear of garages in Coverack Close	13	
1058	<u>Land off Oat Hill Drive, Ecton Brook</u>	11-	
1060	<u>Hayeswood Road, Lings</u>	6	
1071	2 sites off Medway Drive, near Meadow Close	9	
1086a	2 parcels of land in Sunnyside Estate (Cosgrove Road)	6	

1086b	2 parcels of land in Sunnyside Estate (Chalcombe Avenue)	7	
1094	Land off Holmeecross Road	15-	
1096	Land off Mill Lane	14	Policy 31 BN5 of the West Northamptonshire Joint Core Strategy
1097	Gate Lodge	30-	
1098*	The Green, Great Houghton	800 (A minimum of 225 of which will be provided within the plan period)	Policy 41 Policy 30 Policy 31 BN5 of the West Northamptonshire Joint Core Strategy
1099	Upton Reserve site	40	
1100	Hill Farm Rise, Hunsbury Hill (50% of the site)	80	Policy 29 Policy 45
1102	Site east of Towcester Road	60	Policy 29
1104	Watering Lane, Collingtree	265 (A minimum of 200 of which will be provided within the plan period)	BN9 of the West Northamptonshire Joint Core Strategy
1107	Former Abington Mill Farm, land off Rushmere Road	125	Policy 7 Policy 29 Policy 30 Policy 45
1108	Former Dairy Crest depot, Horsley Road	35	
1109	Mill Lane	6 (5YHLS)	Policy 31 BN5 of the West Northamptonshire Joint Core Strategy
1113*	Greyfriars	400 (delivery could be post plan period)	BN9 of the West Northamptonshire Joint Core Strategy Policy 42
1114	Cedarwood Nursing Home, 492 Kettering Road	2-(5YHLS) 31	
1117	133 Queens Park Parade	6 (5YHLS) 8	
1121	Upton Valley Way East	34 (5YHLS)-	
1123	83-103 Trinity Avenue	9 (5YHLS)	
1124	41 – 43 Derngate	7-(5YHLS) 31	Policy 31 BN9 of the West Northamptonshire Joint Core Strategy
1126	5 Primrose Hill	6 (5YHLS)	Policy 31

			<u>BN9 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
1127	32 Connaught Street	6	
1131	The Leys Close, 39 Mill Lane	6 3	<u>Policy 31</u> <u>BN9 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
1133	Eastern District Social Club	5 (5YHLS)	<u>Policy 29</u>
1134	St John's Railway Embankment	12	<u>Policy 29</u>
1137	Wootton Fields	74	
1138	Land south of Bedford Road	7	
1139*	Ransome Road	200 (500 in 5YHLS) 500 (A minimum of 224 of which will be provided within the plan period)	<u>Policy 43</u> <u>Policy 31</u> <u>BN9 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
1140	Land north of Milton Ham	224	<u>BN9 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
1142	Land west of Northampton South SUE (site 2)	130	
1144	Land to the west of Northampton South Sustainable Urban Extension	361 (A minimum of 90 of which will be provided within the plan period)	<u>BN9 of the West</u> <u>Northamptonshire Joint</u> <u>Core Strategy</u>
<p>Development proposals marked with an asterisk (*) will need to conform to the relevant site specific policies 39, 40, 41, 42, 43 or 44, in addition to other relevant planning policies, planning objectives and material considerations.</p> <p>Delivering WNJCS: Policy S34 (Scale and Distribution of Housing Development) Policy S4 (Northampton Related Development Area)</p>			

Type and Mix of Housing

7.12 Consistent with the National Planning Policy Framework and the WNJCS, this plan seeks to ensure that the housing provided in Northampton is of the size, type and tenure needed for different groups in the community including people who require affordable housing, families with children, older people, students, disabled people, Gypsies and Travellers, people who rent their homes and people wishing to commission or build their own homes.

Affordable housing

7.13 JCS Policy H1 sets criteria for the density, mix and type of dwellings for Northampton the borough. Since the adoption of the WNJCS, further housing market evidence, to supplement and update the West Northamptonshire Strategic Housing Market Assessment that informed the Joint Core Strategy has been commissioned and reported. Crucially, the West Northamptonshire Housing Market Evidence report³¹ (WNHME) concluded that 33.45% of housing need from 2016 to 2029 needed to be affordable housing and that any losses from current stock would increase the number of affordable dwellings needed by an equivalent amount. On this basis, there is no reason to change the stipulation in JCS Policy H2 that, for Northampton, the proportion of affordable housing required on developments of 15 or more units should be 35%.

Housing Mix

7.14 For both market housing and affordable housing, the WNHME has modelled the objectively assessed need for housing by type of dwelling from 2016 to 2029 for Northampton as shown in Table 8. One trend that was particularly noted in the report was that demand in Northampton for 1- and 2-bedroom affordable housing flats has reduced significantly to be replaced by a commensurate increase in demand for 2-bedroom houses.

Table 8: Housing mix of objectively assessed need for market and affordable housing, 2016 to 2029

		Market Housing		Affordable Housing		Total (rounded)
Flat	1 bedroom	560	5%	1,080	19%	1,600
	2 bedroom	630	5%	680	12%	1,300
House	2 bedroom	2,470	20%	1,830	32%	4,300
	3 bedroom	6,680	53%	1,580	27%	8,300
	4 bedroom	2,010	16%	500	9%	2,500
	5+ bedroom	170	1%	120	2%	300
	Total (rounded)	12,500		5,800		18,300

Self-build and custom build housing

7.15 In accordance with Government guidance, the Council keeps a register of individuals and associations of individuals who are seeking to acquire serviced plots

³¹ West Northamptonshire Joint Planning Unit – Housing Market Evidence 2017, Opinion Research Services

of land in Northampton for those individuals to occupy as their sole or main residence. ~~The register of self-build and custom build projects also provides the council with evidence when making provision for serviced plots of land. As at 30th October 2021, there were 39 entries on the register of self-build and custom build projects, giving an indication of the level of demand for which the Council needs to ensure provision. On the basis that the market has not made provision for self-build or custom build housing to address this identified demand, the Council requires that 3% of plots on development sites of more than 100 dwellings be provided as serviced plots for self-build and custom build dwellings, as set out in Policy 14.~~

Specialist Housing

7.16 When planning for specialist housing for older people and people with disabilities, it is important that it provides an environment where residents can care for themselves, retain independence for as long as possible and have a security of tenure.

7.17 The Housing Market Evidence shows that, across West Northamptonshire, the number of people aged 65 or over is expected to equate to about half of the overall housing growth. Most of these people will be local and many will want to stay in their existing homes. However, there will be a demand among some of these people, as they get older, for more accessible housing. Furthermore, it is anticipated that a third of the increase in households in West Northamptonshire will include at least one person aged 65 or over.

7.18 In part, these needs can be addressed by ensuring a proportion of new dwellings meet the optional accessibility standards of either M4(2) accessible and adaptable dwellings or M4(3) wheelchair user dwellings to help ensure that certain forms of specialist accommodation are provided. The Housing Market Evidence recommends that a minimum of 4% of all market housing and 8% of affordable housing be built to wheelchair user Building Regulations standard (M4(3)). In addition, national guidance allows the application of M4(2) wheelchair accessible homes only where the Local Authority is responsible for allocating or nominating a person to live in that dwelling.

7.19 The West Northamptonshire Housing Market Evidence³², the County's Joint Strategic Needs Assessment (JSNA) work, and modelling toolkits³³ show that for Northampton, the following provision is required to meet the needs of older people:

³² Study of housing and support needs of older people across Northamptonshire (Northamptonshire Councils and CCGs), (Three Dragons and Associates, March 2017)

³³ <https://www.poppi.org.uk/> - Projecting Older People Population Information

³³ <https://www.pansi.org.uk/> - Projecting Adult Needs and Service Information

³³ <https://www3.northamptonshire.gov.uk/councilservices/adult-socialcare/policies/Documents/Transforming%20Care%20Accommodation%20Plan.pdf>

³³ NCC JSNA - <https://www3.northamptonshire.gov.uk/councilservices/health/health-and-wellbeingboard/northamptonshire-jsna/Pages/default.aspx#GlossaryGroupOverview>

Table 9: Specialist housing requirements

	Total amount (timespan)	Amount per annum
Wheelchair User Dwellings – M4(3) – Category 3	964 (2016 – 2029)	74
Specialist Housing identified by HOPSR	1061 (2019 – 2030)	96
Care beds identified by HOPSR	902 (2019 – 2030)	82
Accessible and adaptable homes – M4(2) – Category 2	8186 (2016 – 2029)	630
Number of units required for people with moderate or severe learning disabilities	66 (2018 – 2023)	13

Specialist Housing

7.20 Accordingly, a significant proportion of new dwellings will need to be accessible and adaptable dwellings to built to Building Regulations Part M Category 2 and 3 standards in Building Regulations. The Northampton Specialist Housing SPD (or its successor document) provides further detail on the figures contained in Table 9 in terms of provision of Category 2 and 3 dwellings and should be referred to at the outset when considering specialist housing within schemes. Further work needs to be carried out to establish the proportion of Category 2 dwellings that would be most appropriate. The Housing Market Evidence also recommends that a minimum of 4% of all market housing and 8% of all affordable housing be built to M4(3) of the Building Regulations. However, Planning Practice Guidance sets out that the requirement for wheelchair accessible homes (Category M4(3) (2) (b) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, wheelchair user dwelling standard (Category 3 of the Building Regulations) and 8% of all affordable housing.

POLICY 14 TYPE AND MIX OF HOUSING

- A. In order to deliver a choice of homes and help create sustainable, inclusive and mixed communities, provision will be made for a range of housing to support the needs and requirements of different households.
- B. Proposals for 10 or more new dwellings should demonstrate how the mix of tenure, type and size of housing proposed on sites will reflect the Council's

latest evidence of housing need and market demand and contribute towards meeting the varied needs of different households including single person households, couples, families with children, older people, people with disabilities and people wishing to build their own homes.

Self-build and custom build housing

- C. On sites of more than 100 dwellings, 3% of the total number of plots should be provided as serviced plots for self and custom build provision should be made for a proportion of serviced plots of land to contribute towards meeting the evidenced demand for self-build and custom build housing in Northampton. Serviced plots of land for self-build and custom build housing will also be supported on other allocated sites or permitted windfall sites where, overall, this would not result in an over-provision of this type of housebuilding when compared to the Council's supply / demand balance.
- D. Plots which have remained vacant for 3 years 12 months after the installation of roads and utilities, sufficient to make them serviced plots, can revert to other forms of housing provision if marketing evidence following a marketing strategy agreed by the local planning authority demonstrates that there have been no expressions of interest for the plots for the purposes of self-build and custom build housing.
- E. The Council will support proposals for self-build and custom build housing which include the creation of low cost and affordable housing.

Specialist and Accessible Housing

- F. The Council will support schemes that provide specialist accommodation that promotes independent living. Such schemes are particularly supported in areas with easy access to services and facilities, including public transport and retail and service centres. Proposals should be designed in a manner which will meet the specialised nature and care requirements of prospective occupiers.
- G. To meet the needs of Northampton's 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.
- H. 4% of all new market dwellings should be constructed to Building regulations M4(3) (2) (a) and 8% of affordable dwellings where the Council is responsible for allocating or nominating occupants should be constructed to Building

Regulations Part M4(3) (2) (b) (~~Wheelchair user dwellings~~) standards, or their successor, to enable wheelchair adaptability and accessibility.

- I. Applicants will need to provide evidence when site constraints prohibit the ability to deliver the required amount of specialist housing. Constraints include sites that are vulnerable to flooding, site topography, instances where the provision of a lift to dwelling entrances is unachievable and other circumstances which may make a site less suitable for M4(2) and / or M4(3) housing, and where viability considerations would not allow for this provision.

Delivering WNJCS:

Policy H2 (Affordable Housing)

Policy H1 (Housing Density and Mix and Type of Dwellings)

Policy H2 (Affordable Housing)

Houses in Multiple Occupation

7.21 Houses in multiple occupation (HMOs) continue to contribute towards ~~Northampton's the Borough's~~ housing supply and perform a vital role within the community. This sector provides accommodation primarily for people who are seeking short to medium term lettings including students, young professionals seeking work opportunities but not necessarily a commitment to a mortgage, deprived social groups who are unable to afford their own homes and international migrants. The West Northamptonshire Joint Core Strategy is clear that the Council will need to make provision for a variety of housing requirements including HMOs.

7.22 For Northampton, there are a range of contributory factors that impact on the demand for HMOs. Northampton is a university town, has employment opportunities tied to logistics/ distribution centres and industrial estates and is relatively close to London for key workers and professionals to commute. In addition, there is increased demand for private rented housing from individuals and families. The relocation of the University of Northampton to its Waterside campus has resulted in a shifting in geographical demand for HMOs.

7.23 Evidence shows that over-concentrations of HMOs can lead to detrimental social, economic, cultural and environmental conditions, leading to adverse impacts on local neighbourhood characteristics³⁴. These include increased noise levels, parking issues and litter, all of which can have a negative impact on people's health and wellbeing. There are also concerns associated with the impact on the community mix, following changes of use from dwellinghouses to HMOs, whereby there is a perception that there are fewer families living permanently within the streets. Parts

³⁴ A Study of Houses in Multiple Occupation Policy (Loughborough University, November 2018)

of Northampton, such as areas within Semilong, Abington, Delapre and Far Cotton have experienced these adverse impacts³⁵.

7.24 To address this, the Council has introduced Article 4 Directions to regulate the proliferation of high concentrations of HMOs. In areas with Article 4 Directions, planning permission is required for the change of use from dwellinghouses to houses in multiple occupation for 3 – 6 unrelated people. Normally, these changes of use are permitted development, which mean that such conversions can be undertaken without the need for planning approval. A Supplementary Planning Document on houses in multiple occupation was adopted in November 2019, which provides details, amongst others, on the requirement to determine planning applications against a specified threshold.

7.25 A study³⁶ on HMOs has confirmed that, to effectively plan for the distribution of HMOs, and to regulate the possible formation of new over-concentrations, a new and more stringent saturation threshold of 10% of dwellings within a 50-metre radius should be adopted. The study also recommended a blanket Article 4 Direction across the former within the Borough.

POLICY 15 DELIVERING HOUSES IN MULTIPLE OCCUPATION

All planning applications for change of use from dwellinghouses to a small house in multiple occupation (Class C4) or a large house in multiple occupation (*sui generis*) will be supported provided that less than 10% of the dwellings within a 50m radius of the application site are houses in multiple occupation. Schemes should be compliant to the Council's existing space standards for houses in multiple occupation, and provide sufficient refuse storage which will be available within the curtilage of the site and within a secure facility. They should not result in an increase in flood risk and risks arising from surface water drainage. The applicant needs to demonstrate that the future occupants of any ground floor bedrooms are protected from flood risk. Appropriate provision should be made for car parking and cycle storage.

**Delivering WNJCS:
Policy H1 (Housing Density and Mix and Types of Dwellings)**

Gypsies and Travellers

³⁵ Interim Planning Policy Statement on Houses in Multiple Occupation, NBC November 2014 and Cabinet Report on Article 4 Directions, NBC March 2017

³⁶ Houses in Multiple Occupation (Loughborough University, November 2018)

~~7.26 The West Northamptonshire Travellers Accommodation Needs Study³⁷ concluded that Northampton did not need to cater for additional pitches in the Local Plan for households that meet the planning definition of Gypsies and Travellers³⁸. There are also no requirements to provide plots for travelling showpeople. However, temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations attended by Gypsies and Travellers. The Study concluded that a charge may be levied as determined by the Council although they only need to provide basic facilities including cold water supply, portaloos, sewage disposal point and refuse disposal facilities, to include cleansing of the site when vacated.~~

~~7.27 This Travellers Accommodation Needs Study updates the requirements set out in Policy H6 of the West Northamptonshire Joint Core Strategy, so there is a need to replace this policy in this Plan, as set out in Policy 16. Policy 16 sets out development management criteria for any future provision that is required as result of any future evidence about requirements for Gypsy and Traveller provision.~~

POLICY 16

GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

- ~~A. Provision will be made for the accommodation of Gypsies, Travellers and Travelling Showpeople in the period 2016 to 2029 to meet the needs identified in the most recent Gypsy, Traveller and Travelling Showpeople needs assessment.~~
- ~~B. Applications for planning permission must meet the following criteria:~~
 - ~~i. The site has safe and convenient vehicular access from the public highway, and provides adequate space for parking, turning and servicing on site.~~
 - ~~ii. The site is reasonably accessible to a range of services set out in national policy, i.e. shops, public transport, primary health care and schools.~~
 - ~~iii. The site will provide an acceptable standard of amenity for the proposed residents. Sites which are exposed to high levels of flood risk and noise and air pollution are not acceptable.~~
 - ~~iv. The site will be capable of providing adequate on-site services for water supply, power, drainage, sewage disposal, waste disposal, composting and recycling facilities.~~

³⁷ West Northamptonshire Travellers Accommodation Needs Study (Opinion Research Services, January 2017)

³⁸ Planning Policy for Travellers Sites (Department for Communities and Local Government, August 2015)

- v. The scale and location of the site will not have an unacceptable impact on the landscape, local infrastructure and existing communities.
- vi. In the case of sites for travelling showpeople there will be sufficient space for the storage and maintenance of equipment and the parking and manoeuvring of all vehicles associated with the occupiers. Additional screening may be required having regard to the nature of the equipment that is being stored.

Replaces Policy H6 of the Joint Core Strategy

CHAPTER 8: ECONOMY

The Local Economy

8.1 Northampton is the County's main employment area. Situated in the East Midlands, with immediate access to the M1 motorway, the town is a strategic location for logistics and distribution with wider Northamptonshire playing a key role in sectors such as motorsports, research into Artificial Intelligence and autonomous vehicles³⁹. Northampton is also positioned within the Oxford to Cambridge Arc which is home to some of the UK's most productive and fast-growing cities, and an area of significant economic potential as outlined by central Government⁴⁰.

8.2 Geographically, Northampton is strategically located and is easily accessible to the majority of UK cities within a 4 hour drive time. The town is also well connected by rail with regular train services from Northampton Station to both London and Birmingham which both can be reached within the hour. Luton, Birmingham and Heathrow airports are all within an hour and a half drive.

8.3 Northampton is home to a range of major employers including headquarters for large companies like Barclaycard, Cosworth, Carlsberg UK, Panasonic UK Ltd, Nationwide Building Society, Avon Cosmetics and Mahle Powertrain and GE Precision Engineering. It also has an Enterprise Zone (see Figure 11), designated in 2011, with just under 64,000sq.m of new built development since its creation. By 2018, approximately 2,000 new jobs had been created within the Enterprise Zone.

8.4 Northampton sits within the South East Midlands Local Enterprise Partnership (SEMLEP) area. The key sectors considered by SEMLEP to be strong are high performance technology, next generation transport, manufacturing and advanced technology, logistics and creative/ cultural, with some of these high performance technology firms located in the Enterprise Zone.

8.5 In 2017 the National Infrastructure Commission⁴¹ prepared a report, 'Partnering for Prosperity' which considered the economic potential of the Cambridge – Milton Keynes – Oxford Arc. The report highlighted the importance of the Arc in relation to the concentration of research, innovation and technology firms within it, noting that Northampton in particular is a centre for high performance engineering.

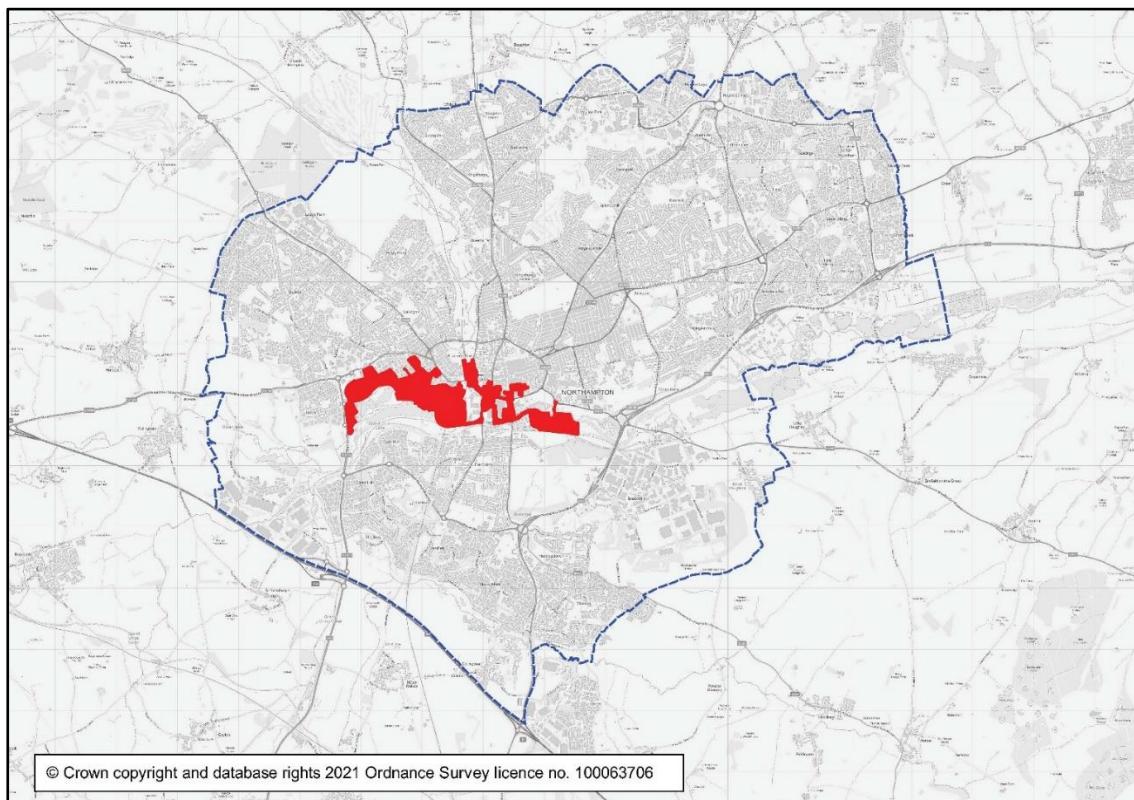
³⁹ South East Midlands Local Industrial Strategy - <https://www.semlep.com/industrial-strategy/>

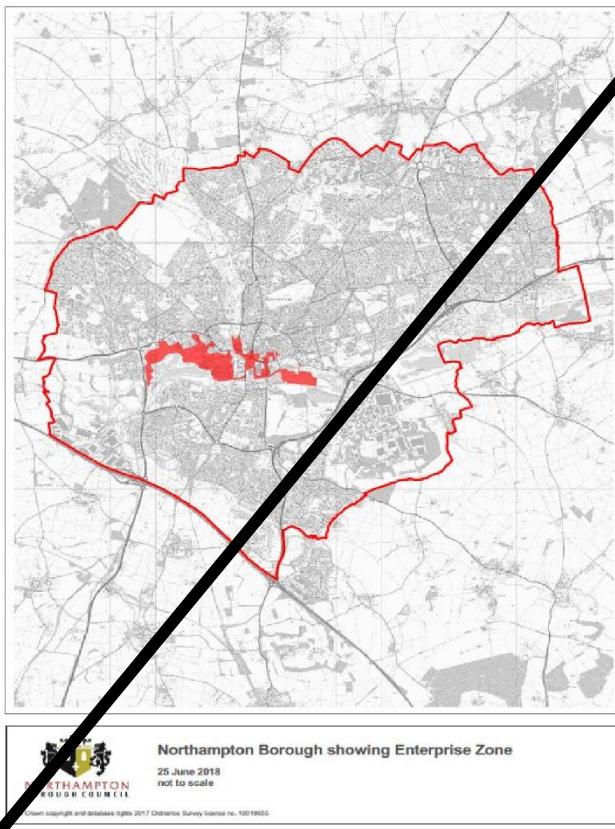
⁴⁰ <https://www.gov.uk/government/publications/the-oxford-cambridge-arc-government-ambition-and-jointdeclaration-between-government-and-local-partners>

⁴¹ Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes-Oxford Arc (National Infrastructure Commission, November 2017)

In March 2019 the Government restated its commitment, alongside local partners, to long term economic and housing delivery across the Arc.

Figure 11: Northampton Waterside Enterprise Zone





8.6 In the Centre for Cities 'Cities Outlook 2019'⁴², Northampton came sixth in the rankings of cities with the highest start-up rate for businesses (per 10,000 population, 2017). In the rankings for cities with the highest number of businesses (per 10,000 population, 2017), Northampton came tenth and in relation to net private sector jobs growth, Northampton was first with an increase of 6.7% between 2016 and 2017.

8.7 This level of confidence in Northampton was strengthened by the development of the new University of Northampton campus in the Enterprise Zone, which opened in September 2018. Town centre regeneration schemes, ranging from the development of the Innovation Centre, the new Northampton Station and the St Johns student accommodation, have all contributed towards securing job creation and retention for Northampton across a wide range of sectors.

8.8 The construction, transport and storage, professional, and scientific and technical industries each make up 14% of the registered businesses within Northampton. Of businesses in Northampton the Borough, 79% employ 0 to 4 people, 28% have a turnover of £50,000 to £99,000 and 31%, a turnover between £100,000 and £249,000⁴³.

⁴² <https://www.centreforcities.org/wp-content/uploads/2019/01/19-01-28-Cities-Outlook-2019-Full.pdf>

⁴³ UK Business: activity, size and location (Office of National Statistics, 2019)

8.9 The latest Government data⁴⁴ shows that nearly 80% of Northampton's population aged 16 – 64 were in employment (July 2018 to June 2019), which is slightly higher than the East Midlands and national averages. This means that Northampton's jobs market is relatively healthy, however, ongoing support for creating the right number and quality of jobs is required in order to ensure that Northampton's residents can continue to have access to jobs. In terms of educational attainment, the number of people with qualifications at NVQ Level 4 and above is 32.6%, which is slightly less than the East Midlands and national average.

8.10 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 comparison⁴⁵. Class B uses (offices, general industrial, storage and warehousing) provide a substantial proportion of Northampton's employment, but an increasing proportion of employment occurs in other uses, such as retail, leisure and the construction industry⁴⁶. 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.

8.11 In May 2020, the Council adopted the Northampton Economic Growth Strategy 2020-2025. Its priorities are:

- Supporting innovators, entrepreneurs and social enterprise
- Creating a 21st century Town Centre
- Maximising the economic benefits of culture and heritage
- Raising Northampton's profile
- Employers at the heart of the skills system
- Northampton as a digital town
- Effective and efficient infrastructure
- Supporting our key sectors
- Tackling the Climate Emergency

8.12 The policies in this Plan support those priorities.

Safeguarding Development

8.13 The Council places significant weight on supporting economic growth and productivity, which accords with Government guidance and the vision and objectives

⁴⁴ <https://www.nomisweb.co.uk/reports/lmp/la/1946157159/report.aspx#tabempunemp>

⁴⁵ Northampton Employment Land Study (NBC/ PBA February 2018)

⁴⁶ NOMIS

of the West Northamptonshire Joint Core Strategy. Comprehensive assessments and reviews of each employment site were undertaken to assess whether the allocated land for employment use in the previous adopted Local Plan should be safeguarded. To maintain a balance of employment provision in the local economy, it is important to continue to support the retention of sites which accommodate the distribution and general industrial market sectors. At the same time, there is a need to continue to promote focused growth in the office sector to ensure that there is a balance in the provision of jobs across all key employment sectors.

8.14 It is acknowledged that there will be ancillary uses which will need to be provided on site to support the employees including childcare provision and gyms. Where there is justification for these to be provided, and it can be demonstrated that there are no existing facilities or that existing facilities are not sufficient, then they are considered to be suitable and likely to be supported. Before the loss of any safeguarded employment site into another use, applicants will be expected to demonstrate that the site has been marketed for a relevant employment use for at least 12 months with no suitable interest being generated. The marketing should be undertaken in accordance with a strategy which ensures that the property is actively marketed to all those likely to be interested in it. Evidence could be provided in terms of advertisements placed in professional journals as well as online. There could also be advertisements placed on the sites/ properties themselves to ascertain local interests in employment uses.

POLICY 17

SAFEGUARDING EXISTING EMPLOYMENT SITES

To facilitate the creation of new jobs, attract inward investment and deliver economic prosperity to Northampton residents and investors, the Council will:

- i. Safeguard all existing employment sites, including the Enterprise Zone, as shown on the Policies Map, for employment use within the office, general industrial and warehousing and distribution sectors. Employment generating uses which are ancillary to and/ or support the above employment sectors will also be supported if evidence associated with need is provided.
- ii. Support the change of use to alternative non-employment-generating uses only if evidence can be provided to demonstrate that the existing use and other employment-generating uses are no longer viable. Evidence to be supplied includes details of active marketing undertaken over a continuous period of 6—12 months which shows that the site has been actively and extensively marketed for employment use and that no suitable interest has been expressed.

Delivering WNJCS:**Policy S7 (Provision of Jobs)****Policy S8 (Distribution of Jobs)****Policy E1 (Existing Employment Areas)****Policy E2 (New Office Floorspace)****Policy E3 (Technology Realm, SEMLEP Northampton Waterside Enterprise Zone)****Policy E8 (Northampton Junction 16 Strategic Employment Site)**

Supporting Job Creation and Retention

8.15 The West Northamptonshire Joint Core Strategy requires the creation of around 28,500 jobs over the plan period to 2029 to ensure that there is a balance between labour supply and housing growth. Northampton is expected to deliver the majority of new jobs in West Northamptonshire. In safeguarding the existing Northampton employment sites, there will be ongoing opportunities for extensions, intensification, redevelopments and churn.

8.16 The West Northamptonshire Joint Authorities Annual Monitoring Report 2017/18 concluded that as a whole West Northamptonshire now provides significantly more employee jobs than at the time of the recession in 2008, with all local authority areas showing gains in employment. The overall net gain of 21,500 jobs indicates that the West Northamptonshire area as a whole is on track to deliver the overall target of 28,000 additional jobs by 2029. The report adds that the 2017 data shows particularly significant increases in jobs compared to 2016 for Northampton (+11,000). If this trend continues, Northampton will be in a better position to contribute further to the creation of jobs in West Northamptonshire.

8.17 The monitoring conclusions are verified by the most recent total employee jobs figures from NOMIS

(<https://www.nomisweb.co.uk/reports/lmp/la/contents.aspx>). In addition, it demonstrates that as a whole, West Northamptonshire now provides significantly more employee jobs than at the time of the recession in 2008, with all local authority areas showing gains in employment. The net gain of 21,500 jobs indicates that the West Northamptonshire area is on track to deliver the overall target of 28,000 additional jobs by 2029.

8.17 The Joint Authorities Monitoring Report for 2019/20 concluded that a net gain of 19,500 net jobs were created between 2008 and 2019 (see Table 10) compared to 22,500 in the period 2008 and 2018. This is the first fall in the number of new jobs since 2012. There are further job losses expected as a result of the Covid pandemic but the overall net gain up to 2019 indicates that West Northamptonshire is still on track to deliver the target set by the Joint Core Strategy. The allocated commercial and employment sites in this local plan are expected to deliver around 2,950 jobs, and

the Pannatoni Northampton site at Junction 16 is expected to deliver a further 2,800 new jobs. Around 7,300 jobs are expected to be created at Northampton Gateway, where the development of a railfreight terminal is underway. Although it is located next to the Northampton area boundary, it will function as part of Northampton and will boost the number of jobs that Northampton will contribute to the overall requirement.

8.17A These, together with significant job opportunities that will be generated in the Daventry area (including the Daventry International Railfreight Terminal 3 which is expected to create around 7,500 jobs and allocations in the Part 2 plan), South Northamptonshire area (including employment allocations in the Part 2 plan) and Sustainable Urban Extensions, all demonstrate that the West Northamptonshire area is on track to deliver the overall target of 28,500 jobs by 2029.

8.17B To support the local economy and to help new job creation opportunities, sites are allocated in this plan for employment led uses. These sites are identified on the policies map.

POLICY 17A **EMPLOYMENT ALLOCATIONS**

The following sites are allocated for employment use. Other policies of particular relevance in this plan (non-exhaustive) are indicated.

<u>Reference</u>	<u>Address</u>	<u>Area (Ha)</u>	<u>No. of jobs (indicative)</u>	<u>Relevant Policies (Non-exhaustive)</u>
LAA0167	Tanner Street	0.38	500*	Policy 44 Policy 7 Policy 31
LAA0594	Sixfields East	10.18	871	Policy 29a Policy 29b
LAA0598	Car Park, Victoria Street	0.63	286	Policy 31
LAA0615	Crow Lane	2.92	94	Policy 7
LAA0818	St Peters Way		*	Policy 7 Policy 31 Policy 44
LAA0870	Sixfields, Upton Way	2.17	170	Policy 7

<u>LAA0931</u>	<u>Sites in Green Street</u>	<u>0.5</u>	*	<u>Policy 44</u> <u>Policy 31</u>
<u>LAA1005</u>	<u>North of Martins Yard</u>	<u>1.4</u>	<u>194</u>	<u>Policy 40</u> <u>Policy 29a</u> <u>Policy 29b</u>
<u>LAA1101</u>	<u>Land at Waterside Way</u>	<u>0.98</u>	<u>445</u>	<u>Policy 29a</u> <u>Policy 29b</u> <u>Policy 30</u>
<u>LAA1112</u>	<u>Milton Ham</u>	<u>9.88</u>	<u>494</u>	<u>Policy 7</u> <u>Policy 29a</u> <u>Policy 29b</u>

(*) these job numbers apply to LAA0818, LAA0167 and LAA0931

Delivering WNJCS:

Policy S7 (Provision of Jobs)

Policy S8 (Distribution of Jobs)

Policy E2 (New Office Floorspace)

Policy E3 (Technology Realm, SEMLEP Northampton Waterside Enterprise Zone)

Table 10: Net job changes in West Northamptonshire⁴⁷

Year	Daventry District	Northampton Borough	South Northamptonshire	West Northamptonshire
2008	38,500	125,000	29,000	192,500
2009	35,000	120,500	28,500	184,000
2010	34,500	122,500	28,500	185,500
2011	35,500	122,500	28,500	186,500
2012	34,000	121,500	28,500	184,500
2013	35,500	123,000	29,000	187,500
2014	35,500	125,000	31,000	191,500
2015	38,000	124,000	32,000	194,000
2016	40,000	128,000	32,000	200,000
2017	41,000	136,000	34,000	211,000
2018	42,000	136,000	36,000	214,000
Change	+3,500	+11,000	+7,000	+21,500

⁴⁷ West Northamptonshire Joint Annual Monitoring Report (2017/18)

2008				
2017				

	Daventry	Northampton	South Northamptonshire	West Northamptonshire
2008	38,500	125,000	29,000	192,500
2009	35,000	120,500	28,500	184,000
2010	34,500	122,500	28,500	185,500
2011	35,500	122,500	28,500	186,500
2012	34,000	121,500	28,500	184,000
2013	35,500	123,000	29,000	187,500
2014	35,500	125,000	31,000	191,500
2015	38,000	124,000	33,000	195,000
2016	40,500	128,000	33,000	201,500
2017	42,000	136,500	34,500	213,000
2018	43,000	135,500	36,500	215,000
2019	42,500	134,500	35,000	212,000
Change				
2008 - 2019	+4,000	+9,500	+6,000	+19,500

8.18 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 enough to accommodate needs not anticipated in the plan including allowing new and flexible working practices.

8.19 In addition, the active promotion of training opportunities and apprenticeships with local employers will be encouraged. This will increase the skills of Northampton's workforce and secure the retention of workers, as well as students who choose to pursue higher education, within the locality.

8.20 New employment related developments within the safeguarded employment sites and the Waterside Enterprise Zone will be positively welcomed. There is some employment land within these safeguarded sites that has the capacity to deliver more employment growth. These sites include land within:

- Northampton Town Centre including land at FOUR Waterside
- Brackmills Industrial Estate
- Swan Valley and Pineham
- Moulton Park

- Lodge Farm
- Crow Lane

POLICY 18

SUPPORTING NEW EMPLOYMENT DEVELOPMENTS AND SCHEMES OUTSIDE SAFEGUARDED SITES

To ensure a vibrant economy, proposals for new employment provision, outside safeguarded employment sites, will be supported provided they meet the following criteria:

- i. The site has been comprehensively assessed as being suitable for employment and is consistent with other relevant policies in this plan and other development plan documents, and the proposed uses and associated employment activities can be carried out without causing harm to adjoining land uses and occupiers, including residential amenity;. The Council supports windfall employment development proposals provided the site has been comprehensively assessed as being suitable for employment purposes. These assessments should include a statement detailing the nature of the proposal, the number of jobs expected to be created, the potential impacts on the uses and occupiers of the surrounding area, and environmental (such as noise and pollution) and traffic considerations. The potential impacts on the surrounding areas should also cover matters such as impacts on the natural environment and heritage and non-heritage assets.
- ii. The site can demonstrate good accessibility by walking, cycling and public transport.

Delivering WNJCS:

Policy S7 (Provision of Jobs)

Policy S8 (Distribution of Jobs)

Policy E1 (Existing Employment Areas)

Policy E2 (New Office Floorspace)

Policy E3 (Technology Realm, SEMLEP Northampton Waterside Enterprise Zone)

Policy E8 (Northampton Junction 16 Strategic Employment Site)

CHAPTER 9: HIERARCHY OF CENTRES, RETAIL AND COMMUNITY SERVICES

Hierarchy of Centres

9.1 Retail provision remains one of the dominant themes of discussion in the last few years, as town centres continue to experience higher rates of vacancies, national retailers have been closing down stores or going out of business and customer have shown increased propensity to shop online. The challenges set by online retailing are substantial.

9.2 Evidence⁴⁸ suggests that the high street is no longer solely driven by retail offerings. The growth in the food and beverage sector is a significant change in UK high streets as town centres adapt to the changing way that people live, socialise, eat and shop. There is also an increase in the number of multi-faceted stores, for example, clothing shops that have barbers and vape shops that serve coffee. It is increasingly recognised that town centres and high streets across the UK need to reshape their role and become more of a hub for the community, incorporating leisure, entertainment, office space, health uses and housing.

9.3 Northampton has a compact town centre which performs a regional role within Northamptonshire. Apart from retail, other uses, including residential, offices and leisure have an important role to play towards ensuring the vitality and viability of the town centre. In addition to the town centre, Northampton's retail hierarchy has District Centres at Weston Favell and Kingsthorpe and Local Centres at St James End, Far Cotton, Wellingborough Road (Abington) and Kettering Road (Kingsley). These centres are shown on the policies map. The Retail and Leisure Study concluded that vacancies in the town centre, despite having fallen since 2010, give rise to some concern given their spatial concentration.

9.4 There are also around 60 neighbourhood centres providing for day-to-day needs and substantial areas of out-of-town shopping at Sixfields, Riverside, St James Retail Park and Mereway which are not in the retail hierarchy. The Retail and Leisure Study concluded that 40% of resident spend is in out of centre locations.

New Retail Provision

9.5 The Council aims to maintain and enhance the vitality and viability of Northampton's ~~the borough's~~ town centre, district centres and local centres. Focusing investment in Northampton's ~~the borough's~~ existing centres will help to promote their economic prosperity as well as help to ensure that economic activity

⁴⁸ Northampton Retail and Leisure Study (Nexus Planning, October 2018)

takes place in the most sustainable locations easily accessible by modes of travel other than the private car.

9.6 The Retail and Leisure Study⁴⁹ includes a health assessment of all the centres designated through the West Northamptonshire Joint Core Strategy. Aside from the town centre, the designated centres are:

- Weston Favell District Centre
- Kingsthorpe District Centre
- Kettering Road Local Centre (Kingsley)
- St James Local Centre
- Far Cotton Local Centre
- Wellingborough Road Local Centre

9.7 The assessments found these centres, including the town centre, to be healthy. It concluded that each district and local centre has a role and function that complements the town centre. Wellingborough Road, for example, has a strong leisure position including restaurants and bars which allow it to function as an ancillary leisure destination, particularly given its proximity to the town centre. Both Weston Favell and Kingsthorpe District Centres continue to perform well, the former having low vacancy rates and the latter being strong on convenience goods. The Plan needs to ensure that the roles and functions of these centres continue to be supported and enhanced.

9.8 The study also identified the quantitative capacity for new convenience and comparison floorspace across Northampton Borough over the plan period, using information available on expenditure and current market shares from the resident population within the study area. The following table shows the conclusion in terms of retail capacity which needs to be reflected in the local plan:

Table 11: Retail floorspace capacity

Year	Convenience goods floorspace capacity (sq.m)		Comparison goods floorspace capacity (sq.m)	
	Min	Max	Min	Max
2018	2,700	3,400	-2,300	-3,100
2021	4,200	5,300	-1,900	-2,600
2025	5,800	7,400	1,200	1,700
2029 (plan period)	7,000	8,900	5,300	7,300

⁴⁹ Northampton Retail and Leisure Study (Nexus Planning, September 2018)

2036	8,900	11,300	12,900	17,600
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9.8A The retail provision figures set out in Policy 19 for convenience floorspace and comparison floorspace reflect the maximum figures to 2029 set out in Table 11 above.

Primary Shopping Area

9.9 The Retail and Leisure study recommended a slight reduction to the Primary Shopping Area (PSA) so that retail could focus on the areas of highest footfall and attractiveness. This reduction will allow other complementary town centre uses, such as office space and residential units, to occupy areas closer to the centre that are currently underperforming and suffering from a high number of vacancies, increasing footfall and ensuring a consistent customer base.

9.10 It was stressed that any applications for retail developments above the locally set threshold and outside of the designated primary shopping area would need to be considered in accordance with the sequential approach and retail impact assessment methodology.

Retail Impact Assessment

9.11 The Retail and Leisure study undertook a review of the retail impact assessment which had been set at a threshold of 1,000 sq.m. for new retail development outside Northampton Town Centre's Primary Shopping Area. Issues such as the overall scale and draw of the centres, the number of available opportunity sites and market patterns were considered to assess what scale of proposal would be likely to impact upon the vitality and viability of a centre. It concluded that the centres across Northampton the Borough are potentially vulnerable to competing edge-of-centre and out-of-centre retail developments that would jeopardise the vitality and viability of the centres. It was recommended that the threshold for retail impact assessment be set at 500 sq.m across Northampton the Borough.

POLICY 19 NEW RETAIL DEVELOPMENTS AND RETAIL IMPACT ASSESSMENT

- A. The Council will support the provision of between 7,000 sq.m and about 8,900 sq.m net of convenience retail floorspace and between 5,300 sq.m and about

7,300 sq.m net of comparison floorspace to meet forecast retail expenditure to 2029 in the defined retail hierarchy as set out in the table below.

Retail Hierarchy:

Regional Town Centre	Northampton town centre
District Centres	Weston Favell
	Kingsthorpe
Local Centres	St James End
	Far Cotton
	Wellingborough Road (Abington)
	Kettering Road (Kingsley)
	Local Centres provided within SUEs

B. The Council will support proposals which meet the following criteria:

- i. Will deliver retail firstly in the Primary Shopping Area, followed by the Town Centre as shown on the Policies Map. Priority will be given to additional comparison retail in the town centre. If no suitable, viable and available sites exist in the centres identified in this policy (taking account of reasonable flexibility in the format of the proposal), then proposals for sites in the District and Local Centres, as shown on the Policies Map, will be considered. It is not accepted that specific classes of goods cannot be sold from in-centre locations. Developments will need to demonstrate flexibility in their operational requirements in terms of their form.
- ii. Any retail proposals on sites outside centres in the retail hierarchy will be required to demonstrate compliance with the sequential approach to site selection. For those proposals exceeding 500 square metres gross floorspace, it will have to be demonstrated that the proposal will not have an unacceptable impact on existing centres in the retail hierarchy through the preparation of a Retail Impact Assessment.
- iii. Within the defined Primary Shopping Area, development proposals should provide an active frontage and be open for business during the day.
 - a. ~~Not result in the loss of Class A1 retail floorspace within a frontage unless the alternative town centre use contributes to the vitality and viability of the town centre. In assessing whether a proposal contributes to the vitality and viability of the town centre, regard will be had to avoiding the over concentration of non-Class A1 town centre~~

- ~~uses within a frontage to the extent that the retail character of the frontage is undermined; and~~
- b. ~~Provide an active frontage and be open for business during the day~~
- C. 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.

Delivering WNJCS:

Policy S2 (Hierarchy of Centres)

Policy S9 (Distribution of Retail Development)

~~Hot Food Takeaways~~

9.12 Nationally, it is estimated that obesity is responsible for more than 30,000 deaths each year. Public Health England anticipates that in the future, obesity could overtake tobacco smoking as the biggest cause of preventable death. Obese people are:

- At increased risk of certain cancers including colon cancer
- More than 2.5 times more likely to develop high blood pressure (risk factor for heart disease)
- 5 times more likely to develop type 2 diabetes

9.13 A Public Health Northamptonshire report⁵⁰ referred to the following as being linked to the rise in obesity:

- We are living in an obesogenic environment where less than healthier choices are the default, which encourages excess weight gain and obesity
- While achieving and maintaining calorie balance is a consequence of individual decisions about diet and activity, our environment, and particularly the availability of calorie rich food, now makes it harder for individuals to maintain healthier lifestyle
- The increasing consumption of out-of-home meals, that are often cheap and readily available at all times of the day, has been identified as an important factor contributing to rising levels of obesity

9.14 The report states that in Northampton, 68.1% of the adult population over 16 are overweight or obese (compared to 62% in England), with children showing levels of 22.7% (4-5 years old) rising to 36.4% (10-11 years old). Analysis of national data shows that there is a statistical correlation between the density of fast food outlets

⁵⁰ Obesity and health and wellbeing in Northampton (Public Health Northamptonshire, March 2020)

and the prevalence of obesity. Northampton has the 3rd highest density in the country, at 86.9 per 100,000 population. It is therefore important for the Local Plan to address these challenges associated with health and wellbeing, and its relationship with poor diet and accessibility to facilities that contribute to this.

9.15 According to Public Health England⁵¹, takeaway foods tend to contain high levels of fat, saturated fat, sugar and salt, and lower levels of micronutrients. Some takeaway food can represent a low cost option to the consumer, which may enhance its appeal, including to children. Evidence shows that regular consumption of takeaway food over time has been linked to weight gain. Government guidelines support actions (like exclusion zones) to limit the proliferation of certain unhealthy uses within specified areas such as proximity to schools. Exclusion zone buffer sizes are usually set at 400m which is considered to be a reasonable 5 minute walk.

POLICY 20 HOT FOOD TAKEAWAYS

The health and wellbeing of Northampton communities will be maintained and improved by managing the locations of, and access to, unhealthy eating facilities.

Proposals for new hot food takeaways (Class A5) which are situated within close proximity to a primary or a secondary school will only be permitted if the takeaway facility is located at least 400m from any entrance to the a primary or secondary school.

Delivering WNJCS: Policy

Residential Development on Upper Floors

9.16 In addition to main town centre uses in designated centres, evidence shows that residential provision in the town centre would assist in introducing a resident customer base into these centres, increasing footfall, vitality and viability. However, not all units are suitable for conversions and only schemes in acceptable locations, where a suitable standard of residential amenity with regard to noise, air quality and odour can be achieved, will be supported.

⁵¹ Using the planning system to promote healthy weight environment (Public Health England, 2020)

POLICY 21

RESIDENTIAL DEVELOPMENT ON UPPER FLOORS

~~In suitable locations, proposals that seek to deliver residential accommodation on upper floors in the town centre, district centres and local centres will be supported, subject to all other material considerations.~~

Residential development within the town centre will be specifically supported where this is above ground floor and has access which does not require people to pass through a business use.

Delivering WNJCS: Policy S2 (Hierarchy of Centres)

Neighbourhood Centres

9.17 In addition to ensuring that Northampton the Borough is better equipped to deal with meeting people's health requirements, the Local Plan also has an important role to play in achieving a much healthier lifestyle and an inclusive community.

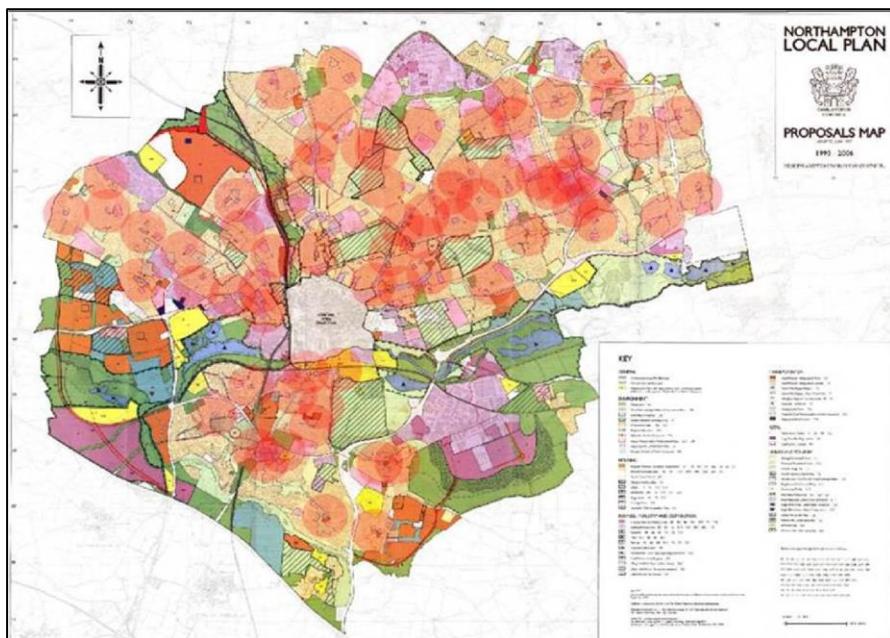
9.18 There are around 60 neighbourhood parades in Northampton which cater for the day to day needs of the local community. They are smaller in size than the local centres defined through the West Northamptonshire Joint Core Strategy. However, they vary in terms of success, sizes, occupancy and facilities.

9.19 These parades predominantly accommodate shops and services which cater for people's day to day needs such as a small convenience store, newsagent, hairdressers, a hot food takeaway and a post office. Some also include community facilities and leisure such as a pub.

9.20 These centres perform a variety of roles including promoting social interaction and supporting a healthier lifestyle. They provide a valuable service to the people living nearby within their catchment, supporting community links as well as providing services for less mobile members of the community. These local facilities also promote sustainable living, allowing people to walk to these centres. In Northampton, the majority of the residential areas are located within 400m of a neighbourhood parade. The Chartered Institution of Highways and Transportation guidance⁵² states that 400m (5 minutes' walk) would be an acceptable walking distance to a neighbourhood centre and 800m (10 minutes' walk) would be the maximum.

⁵² Retail and Neighbourhood Centres Study, NBC/ Peter Brett Associates 2014)

Figure 12: Existing Neighbourhood Centres



9.21 It is accepted that these shops and services, whilst operating as individual businesses, are very much affected by the prospect of the whole parade⁵³. These parades build relationships with their communities and know their market well. There is therefore a need to be both flexible and responsive, allowing businesses to use spaces innovatively and respond to changing needs.

POLICY 22 NEIGHBOURHOOD CENTRES

In supporting the retention of neighbourhood centres, any proposals that would result in the loss of a centre will need to demonstrate the following:

- i. There is an existing neighbourhood centre within a 400m radius
- ii. A viability assessment, to include robust marketing and evidence of community interest, has been undertaken which provides evidence that it is not viable for the parade to continue operating

Delivering WNJCS: Policy RC2 (Community Needs)

⁵³ Parades to be proud of: Strategies to support Local Shops (CLG, June 2012)

Sports Facilities, Playing Pitches and Community Facilities

9.23 Community and sports facilities are important in ensuring that the needs of the communities are met in an accessible manner. These facilities are usually integrated, for example, sports facilities can be used for events like birthday celebrations or community led meetings. Likewise, schools with sports facilities can allow clubs to use these facilities for tournaments. These facilities can therefore have dual purposes. As communities expand, so do their requirements for a range of provision such as local shops, doctors surgeries, health centres, schools, childcare, sports and playing pitches, and community centres. The West Northamptonshire Joint Core Strategy (policies RC1 and RC2) sets out the approach that applies to the provision of new community facilities and the loss of existing ones.

Sports Facilities

9.24 Studies show that sports facilities and playing pitches which are used by the community not only promote health and wellbeing but also foster a sense of community. It is therefore important for sufficient facilities to be provided to serve the community, and delivered early and on time.

9.25 A study⁵⁴ was commissioned to forecast the future needs for sports facilities up to 2029. The approach to this assessment and the development of the recommendations reflected guidance from Sport England (2014). The study assessed all the sports facilities in Northampton including sports halls, swimming pools, athletics grounds, squash courts, golf and tennis courts. It also assessed village and community halls as well as leisure facilities. This study took into consideration the population increase in the Northampton Related Development Area as well as the cross-border movement of people to take part in sport. The study concluded that the sports facilities should be retained and enhanced to ensure that the needs of future communities in Northampton can be met. For the purposes of the policy, "sports facilities" cover sports halls, swimming pools, health and fitness, athletics, squash, gymnastics, bowls, tennis, golf, village and community halls, cycling, netball, judo, countryside and water sports, rowing, canoeing and orienteering.

Playing Pitches

9.26 Further evidence dealing specifically with playing pitches was also commissioned⁵⁵ to better understand the supply and demand for grass and artificial

⁵⁴ Planning the future of open space, sport and recreation in West Northamptonshire – Part 2 Sports Facilities (Nortoft, February 2018)

⁵⁵ Planning the future of open space, sport and recreation in West Northamptonshire – Part 2 Playing Pitch Strategy (Nortoft, March 2018)

pitches used by communities across Northampton, including the Sustainable Urban Extensions and the wider West Northamptonshire area as well as Daventry and South Northamptonshire. Examples of playing pitches in Northampton include those in secondary schools (such as Northampton School for Boys, Northampton High School and Malcolm Arnold), as well as the larger grounds within Northampton such as Northampton Town Football Club and the Old Northamptonian sports ground which are used for rugby, football and cricket. The study notes that artificial grass pitches are becoming an increasingly important element of pitch sport provision. In addition, some pitches can also be shared between the different sports. The study concluded that there is a significant shortfall of smaller playing pitches in Northampton but there is surplus capacity of larger (senior) pitches. It adds that there should be sufficient secure and accessible pitch space to meet all of the future demand but this will depend on some senior sites to be remarked and reused for minis and youth teams. For the purposes of policy, the term "playing pitches" covers football, cricket, rugby union, hockey, baseball, rugby league and gaelic football.

POLICY 23

SPORTS FACILITIES AND PLAYING PITCHES

- A. Sports facilities and playing pitches, as defined in the justification text, should be safeguarded from development unless:
 - i. An assessment has been undertaken which has clearly shown the open space, buildings or land to be that the facility is surplus to requirements; or
 - ii. The loss resulting from the proposed development would be replaced by an equivalent or better provision in terms of quantity and quality in a suitable location; or
 - iii. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use
- B. Development resulting in the loss of an existing sports related community facility, which is well used and valued, will only be acceptable in the following circumstances:
 - i. Adequate alternative provision exists within 800m (10 minutes) walking distance; and
 - ii. All reasonable efforts have been made to preserve the facility but it has been demonstrated that it would not be economically viable or feasible
- C. Proposals for major developments are expected to have regard to contribute towards providing facilities in line with the recommendations

provided in 'Sports facilities for West Northamptonshire' report and Part 3 of the 'Planning the future of open space, sport and recreation in West Northamptonshire – Playing Pitch Strategy' or subsequent updates.

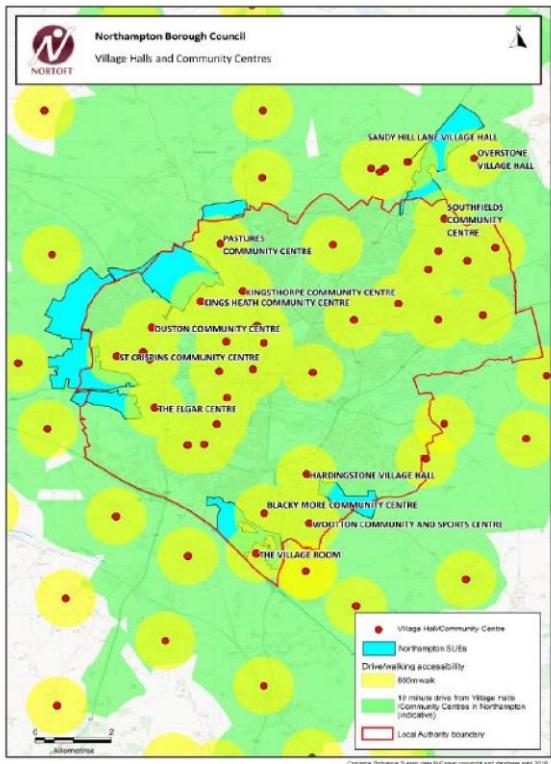
Delivering WNJCS: Policy RC2 (Community Needs)

Community Facilities

9.27 Northampton's growing population will result in an increasing demand for community facilities including doctor's surgeries, health centres and places of worship. It has already been mentioned that some community facilities, such as village halls and community centres, are designed to be multi-purpose and can be used for sports.

9.28 There are currently more than 34 village or community halls in Northampton (see figure 13 below). All of Northampton's residents have access to at least one village or community hall within 10 minutes' drive time. Many people have access within 10 minutes' walking time (800m catchment). These multi-use centres are easily accessible and are both sustainable and beneficial to communities. It is essential that these facilities are retained, unless there are clear justifications for their loss. The Fields in Trust guidelines recommend that the loss of a community facility would only be acceptable if there is an alternative facility within 800m or within 10 minutes' walk⁵⁶.

Figure 13: Village and community hall locations in Northampton and its adjoining area



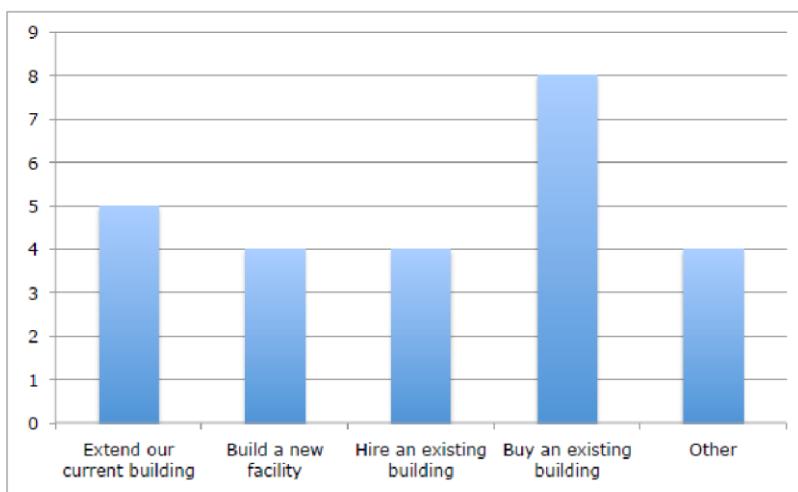
9.29 The Built Facilities Study⁵⁶ notes that new community centres are proposed in the West Northamptonshire Joint Core Strategy for Sustainable Urban Extensions for Kings Heath, Northampton West and Northampton North. It is important for new facilities to be delivered in a timely manner.

9.30 Northampton's faith communities play an important role in the voluntary and community sector, providing, amongst other things, local and neighbourhood facilities and support for those in need. Key to delivering these roles is the availability of places of worship. Evidence commissioned⁵⁷ concluded that the various faith groups who responded to the survey (25 in total) have various approaches to meeting this requirement (see figure 13). The study concluded that there is a substantial demand for new facilities amongst faith groups with 48% stating that they needed additional space or facilities.

⁵⁶ Northampton Open Space, Sport and Recreation Study – Part 2 (Nortoft, March 2018)

⁵⁷ Northampton Faith Communities Profile and Places of Worship Audit and Needs Assessment (CAG, June 2013)

Figure 14: Meeting community needs



9.31 The need for the above community services and facilities can be met in a variety of ways including extension of existing facilities, maximising the opportunities offered by vacant units, conversion of buildings and from new developments. For religious groups in particular, the ability to hire facilities could play an important role as would shared facilities.

POLICY 24

COMMUNITY FACILITIES

~~Development of new, or alterations to existing, community facilities will be viewed favourably where they are in a sustainable location and contribute positively to the well-being and social cohesion of local communities.~~

~~Proposals for new or extended community, and for change of use to such facilities, including places of worship, will be considered against the following:~~

- i. ~~The property/ site should be accessible by public transport and other sustainable transport modes including walking and cycling~~
 - ii. ~~Any proposal should not result in any significant, adverse impact on the residential amenity of the area including impacts associated with noise and traffic~~
- A. Proposals for new community facilities, alterations or extensions to existing facilities and change of use to such facilities, will be viewed favourably where they:
- i. are located where the property / site is accessible by public transport and other sustainable transport modes including walking and cycling
 - ii. contribute positively to the well-being and social cohesion of local communities, and
 - iii. do not result in any significant adverse impact on the residential amenity of the area including impacts associated with noise and traffic.
- B. Development resulting in the loss of a community facility, which is well used and valued, will only be acceptable in the following circumstances:
- i. Adequate alternative provision exists within 800m (10 minutes) walking distance; and
 - ii. All reasonable efforts have been made to preserve the facility but it has been demonstrated that it would not be economically viable or feasible

Delivering WNJCS:
Policy RC1 (Delivering Community Regeneration)
Policy RC2 (Community Needs)

Childcare Provision

9.32 Children benefit from social, physical and cognitive development and outcomes helping them to prepare for school. Evidence shows that attending high quality early education has a lasting impact on social and behavioural outcomes.

9.33 A number of major housing projects have either started or are due to start in the period to 2029. It is assumed that these housing developments will lead to an increase in the population locally, increasing the demand for childcare. The Childcare Act 2006 puts a duty on Local Authorities to provide sufficient childcare for working parents or parents who are studying or training for employment and to ensure there are early years funded education places for all eligible children up to compulsory school age.

9.34 The Northamptonshire Childcare Sufficiency Assessment (Interim Jan 18) outlines that there is currently sufficient provision across the country for 2, 3 and 4 year olds that are entitled to free places and that this is sufficient for the next two years. However, there are areas which have a surplus of these childcare places. This is attributed to parents not choosing a childcare place near to where they live but instead, choosing providers close to their workplaces. In Northamptonshire, take up of free entitlement place is below the national rate. Northampton has the highest number of children eligible for 2 years funding (75%) but has the lowest take up (60%). The Assessment concluded that there seems to be sufficient capacity across the County as a whole. However, with the requirement to deliver a high number of dwellings in Northampton, it is anticipated that there will be impacts on childcare provision.

POLICY 25 CHILDCARE PROVISION

To ensure the supply of childcare within Northampton is strategically managed, and to ensure that there is sufficient, high quality, flexible childcare that is affordable and meets the needs of parents and carers, development for childcare provision should:

- i. Locate premises within sustainable locations—with good public transport facilities, access to cycling and walking routes, and away from major roads
- ii. Maximise the use of current educational establishments
- iii. Ensure that new developments are accessible and inclusive for a range of users, including disabled people
- iv. Ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing need or future demand.

Delivering WNJCS:

Policy RC2 (Community Needs)

Burial Space and Provision

9.35 Northampton's population has grown significantly from 212,500 (2011) to 225,500 (2016). This growth is set to continue, with the West Northamptonshire Joint Core Strategy's target of 18,870 homes to be delivered in Northampton by 2029. This means that demand for burial space and cremations will also increase over the plan period, highlighting the need to plan for future requirements. Evidence shows that there are changing representations of faith communities in Northampton and this will need to be reflected in the future provision of burial space.⁵⁸

9.36 The Borough of Northampton accommodates mainly large burial sites which are owned and managed by the Council, including Towcester Road cemetery and Kingsthorpe Cemetery, and a private crematorium. In addition, several churches also provide some burial/ interment capacity, but space is very limited and insufficient to cater for need. This Plan therefore aims to ensure that sufficient land is allocated and safeguarded to meet the identified requirements for burial space. A study commissioned by the Council⁵⁹ concluded that, by 2029, there will be a deficit of burial space capacity of 4,011 plots. It is therefore important that the deficit is addressed in this plan.

POLICY 26 SITES FOR BURIAL SPACE

- A. To meet the need for future burial spaces, the following sites, as indicated on the Policies Map, will be are allocated for this use:
 - i. Land adjoining Kingsthorpe cemetery
 - ii. Land adjoining Dallington cemetery
 - iii. Land adjoining Towcester Road cemetery
- B. When considering any proposals for extensions, consideration should be given to securing the enhancement of the roles that burial grounds play in the wider community, including its greenspace / amenity / ecological and heritage values. Opportunities to improve the provision to accommodate the requirements of religious groups and people of no religion, such as washing facilities, should also be included in any design considerations.

⁵⁸ Northampton Faith Communities Profile and Places of Worship Audit and Needs Assessment (CAG, June 2013)

⁵⁹ Northampton Burial Space Need and Provision Study (Enzygo, 2018)

- C. Ecological assessments should 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 result in a net gain in biodiversity.

**Delivering WNJCS:
Policy RC2 (Community Needs)**

CHAPTER 10: BUILT AND NATURAL ENVIRONMENT

The Natural Environment

Green and blue infrastructure

10.1 The National Planning Policy Framework (NPPF) defines Green Infrastructure (GI) as a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of ecosystem services and quality of life benefits for local communities. Green infrastructure includes assets such as parks, open spaces, playing fields, woodlands, churchyards, field boundaries, archaeological sites, street trees, allotments and private gardens. Blue infrastructure provides the same benefits as GI and includes streams, ponds, canals and other water bodies. The Green Infrastructure framework, including blue infrastructure provides a range of ecosystem services which provide benefits to Northampton. This Plan provides further guidance on the detailed requirements for the creation, enhancement and management of green infrastructure, in line with the requirements set out in the West Northamptonshire Joint Core Strategy and associated Infrastructure Delivery Plan.

10.2 In Northampton the environmental and historic features have provided a rich green and blue infrastructure legacy of historic parks like Delapre and the Racecourse, amenity green spaces set in the framework of places where people live and work, natural and semi natural landscapes including Kingsthorpe Nature Reserve and green / blue corridors like the River Nene, Grand Union Canal and Brampton Valley Way. Other places of note include allotments such as Berrywood Road, play areas and teen facilities such as Radlands Plaza Skate Park and places for quiet reflection like the grounds of the Holy Sepulchre.

10.3 Green Infrastructure provides a range of benefits including opportunities for sustainable movement by cycle or on foot, positive impacts on the health and wellbeing of residents and visitors, quality environments that attract investment in terms of housing and jobs, as well as perform important functions relating to the natural environment, climate change, mitigation and adaptation.

10.4 Northampton's Green Infrastructure provides a range of benefits and contributes to:

- the protection, conservation, enhancement, management of and net gain in biodiversity resources by reducing fragmentation and increasing and enriching species diversity
- improving connectivity and access by linking natural assets and encouraging modal shift to walking and cycling

- better community and public health by improving air quality and open-air surroundings to encourage outdoor activity which lowers stress levels and improves mental and physical health and well-being
- the protection, conservation, enhancement and management of historic landscapes, archaeological and built heritage assets and their settings
- climate change adaptation through water management, reducing the impact of flooding, higher temperatures, drier summers and counteracting the heat island effect
- the development and delivery of ecosystem services

10.5 The Northampton Green Infrastructure Plan (GIP) (2016) defines a Local Level Green Infrastructure (LLGI) Network for the Northampton Related Development Area (NRDA) ~~borough~~. Comprising nine components, the GIP sets out a number of projects for the Northampton Related Development Area which will deliver multi-functional benefits to people and wildlife. Alongside this GIP, other habitat opportunity mapping tools and natural capital solutions can be used to identify potential areas for expansion of key habitats. These tools have been used to supplement the specific site policies.

10.6 Natural England defines 159 character areas in England. These are areas that share similar landscape characteristics, and which follow natural lines in the landscape rather than administrative boundaries. Northampton sits within the Northamptonshire Vales National Character Area.

POLICY 27

SUSTAINING AND ENHANCING EXISTING, AND SUPPORTING THE CREATION OF, NORTHAMPTON'S GREEN INFRASTRUCTURE

- A. New developments must ensure that existing green and blue infrastructure assets will be protected, managed, maintained and connected to enhance their multi-functionality.
- B. All major housing and commercial developments of ~~15 dwellings or more~~ will be expected to deliver and / or contribute to the green and blue infrastructure projects. Applications must be accompanied by a site-specific green and blue infrastructure strategy and /or plan to illustrate how green and blue infrastructure is integrated within the development proposal and how it seeks to improve connectivity to the Local Level Green Infrastructure network beyond the site boundary.
- C. In accordance with Best Practice Principles, Aims and Objectives set out in the Northampton Green Infrastructure Plan (or subsequent updated documents), development proposals will demonstrate how they make a positive

contribution to the projects identified within the 9 Green Infrastructure Components and associated projects contained in the Northampton Green Infrastructure Plan.

Delivering WNJCS:

Policy S10 (Sustainable Development Principles)

Policy BN1 (Green Infrastructure Connections)

Policy BN2 (Biodiversity)

Policy BN3 (Woodland Enhancement and Creation)

Policy BN8 (The River Nene Strategic River Corridor)

Open Space, Sport and Recreation

10.7 The National Planning Policy Framework (2019) recognises that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Alongside other Green Infrastructure assets, areas of open space, and sports and recreation land provide an important community function and can make a significant contribution to health and wellbeing.

10.8 Northampton has 21 designated parks, over 200 amenity green spaces, over 85 natural or semi natural areas, over 100 children or young people equipped play spaces, 22 allotment sites and 43 cemeteries and churchyards⁶⁰. Figure 16 provides a snapshot of their locations within Northampton the Borough. Together, these provide around 1,396 hectares of open spaces contained within the Local Level Green Infrastructure Network, identified in the Northampton Green Infrastructure Plan⁶¹. There is a significant variation in the distribution, quality, accessibility and connectivity of these open spaces.

10.9 The Open Space, Sport and Recreation Study⁶² (OSSR) outlined the baseline of open spaces in Northampton, determined the classification and set the quality, quantity and accessibility standards for Northampton the Borough. The types were

⁶⁰ Open Space, Sport and Recreation Study (Northampton Borough Council, with technical evidence supplied by Nortoft, March 2018)

⁶¹ Northampton Green Infrastructure Plan (Fiona Fyfe Associates, 2016)

⁶² Open Space, Sport and Recreation Study (Northampton Borough Council, with technical evidence supplied by Nortoft, March 2018)

based on the guidance set in Planning Policy Guidance 17 (PPG17) which is still used to inform revised audit and needs assessment. The classification of types is set out below.

Figure 15: Open space classification for Northampton

Parks and Gardens (P&G)	Urban parks, country parks and formal gardens, open to the general public providing opportunities for informal recreation and community events
Amenity green space (AGS)	Informal recreation and green spaces in and around housing, with a primary purpose of providing opportunities for informal activities close to home or work
Natural/ semi natural space (NSN)	Woodlands, scrubland, orchards, grasslands (eg meadow and non-amenity grassland), wetlands and river corridors, nature reserves and brownfield land with a primary purpose of wildlife conservation and biodiversity
Play provision for children and young people (CYP)	Equipped play areas with the primary purpose of providing opportunities for play, physical activity and social interaction involving both children and young people
Allotments (ALL)	Allotments providing opportunities for people to grow their own produce
Cemeteries and churchyards (C&C)	Private burial grounds, local authority burial grounds and disused churchyards
Civic spaces	Including civic and market square and other hard surfaced community areas designed for pedestrians

10.10 It is essential that these facilities are maintained and increased as studies have shown that the provision of green and open spaces can have positive effects on health and wellbeing⁶³.

10.11 Based on the Open Space study undertaken jointly by consultants and Northampton Borough Council, standards have been derived to ensure that the requirements of the future residents are catered for when new development proposals are considered. The formulae for calculating these standards are set out

⁶³ Green Space and Health (Parliamentary Office of Science & Technology, POSTnote 538 October 2016)

in the Planning Obligations Supplementary Planning Document 2013. Any updates to the SPD will incorporate the formulae.

10.11A Suitable Alternative Natural Greenspaces (SANGS) are existing areas of open land which are improved to attract residents of new developments away from designated sites such as Special Protection Areas and Special Areas of Conservation. SANGS need to be suitably designed for recreation, accessible and usually provide circular footpaths. As set out in Policy 28, the provision of a SANG may meet or contribute to the provision of other types of open space.

POLICY 28 PROVIDING OPEN SPACE

- A. New major developments must ensure that open spaces defined on the Policies Map are sustained or enhanced.
- B. Major developments will be required to contribute to open space provision as per the standards below.

Open space type	Planning standards for new development		
	Quantity per population	Maximum distance of provision from all parts of proposed development Accessibility	Reference quality standard to be applied Quality
Parks and gardens	1.43ha per 1,000	710m <u>walk</u>	Green Flag ⁶⁴ standard in association with the Local Quality Vision Statement
Amenity green space	1.45ha per 1,000	480m <u>walk</u>	NBC Assessment Framework in association with the Local Quality Vision Statement Green Flag Standard

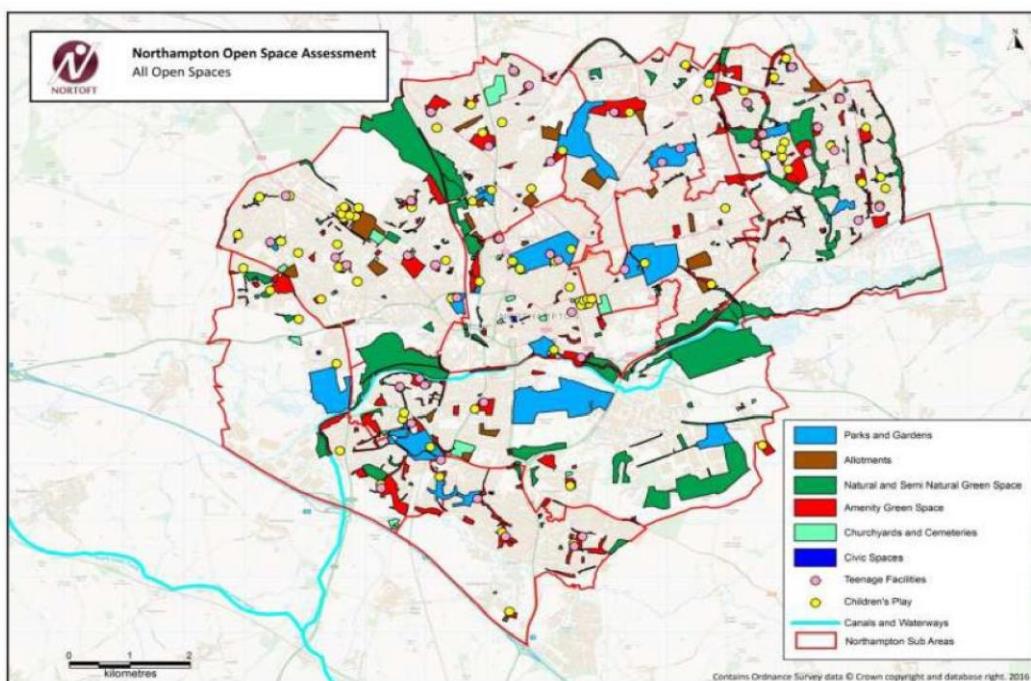
⁶⁴ <https://www.greenflagaward.org/>

Natural and Semi Natural Green Space	1.57ha per 1,000	720m walk	<u>NBC Assessment Framework Green Flag Standard</u>
Children's Play and provision for young people	0.25ha per 1,000 of Designated Equipped Playing Space including teenage provision	400m <u>walk</u> for teenage LEAP 1,000m <u>walk</u> for NEAP 1,000m <u>walk</u> for teenage facilities	New LEAPs and NEAPs should meet the Fields in Trust ⁶⁵ standards as relevant to the individual site. New youth provision should reflect current best practice, and also take into account the needs expressed by young local people.
Allotments	0.36ha per 1,000	1,000m <u>walk</u>	Allotments should be secure with gates and fencing providing suitable and accessible areas for growing, and where applicable, an adequate water supply and car parking.
Civic Spaces	Specific to the locality. No set standard required.		<u>Green Flag Standard</u>
Cemeteries and closed churchyards	Specific to the locality. No set standard required.		<u>Green Flag Standard</u>
<p>C. Where standards cannot be met on site, developers are required to contribute towards off site provision.</p> <p>D. <u>Where Suitable Alternative Natural Greenspace (SANG) is required, it is accepted that this may meet or contribute to the requirements of open space set out in the table above.</u></p>			

⁶⁵ <https://www.fieldsintrust.org/>

Delivering WNJCS:
Policy S10 (Sustainable Development Principles)
Policy BN1 (Green Infrastructure Connections)
Policy BN2 (Biodiversity)
Policy BN3 (Woodland Enhancement and Creation)
Policy BN8 (The River Nene Strategic River Corridor)

Figure 16: Open spaces in Northampton (all typologies)



Biodiversity and Geodiversity

10.12 The Borough Northampton is predominantly an urban area, however, it is rich in biodiversity and accommodates the Upper Nene Valley Gravel Pits Special Protection Area (SPA), which is also a Ramsar site and Site of Special Scientific Interest, six Local Nature Reserves and 48 Local Wildlife Sites as well as a number of parks, open spaces and plentiful greenspaces. All of these sites are valuable natural and historic assets which contribute to the biodiversity (number, variety and variability of living organisms) and geodiversity of Northampton as well as the health and wellbeing of residents and visitors through accessibility to the natural environment.

10.13 Of international importance, in terms of biodiversity, are the Clifford Hill Gravel Pits, which form part of the Upper Nene Valley Gravel Pits SPA. Located in the south east of the borough and being of international importance for migrating birds, the site is also designated as a Site of Special Scientific Interest and a Ramsar Site.

The SPA is afforded specific protection which is outlined in Policy 30 to ensure that it is not adversely affected by new development.

10.14 Northampton is also home to priority habitats and species such as calcareous grasslands at Bradlaugh Fields and Kingsthorpe Meadows, and the biodiversity network along the River Nene and its associated wetlands, grasslands and tributaries, in particular at the Brampton Arm.

10.15 The 2015 Northamptonshire Biodiversity Supplementary Planning Document provides guidelines for planning applicants, policy makers and decision makers within partner authorities, and should be referred to (or its subsequent updates) when preparing or considering a proposal. Biodiversity maps for Northampton can be found on the West Northamptonshire Council website, as well as through the Northamptonshire Biodiversity Records Centre.

POLICY 29**SUPPORTING AND ENHANCING BIODIVERSITY**

1. 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. Development should avoid the fragmentation of habitats and links, and address the Northamptonshire Biodiversity Action Plan local priorities for habitats and species.
2. In particular, the Council will seek the protection or enhancement of ecological network in line with their status as set out below:
 - **Sites of national or international importance**
The Upper Nene Valley Gravel Pits is designated a Special Protection Area, a Ramsar site and a Site of Special Scientific Interest. All proposals must comply with Policy 30.
 - **Sites of local importance**
Development affecting the Borough's Local Nature Reserves and Local Wildlife Sites will be expected to avoid causing adverse effects unless it can be demonstrated that the benefits of development clearly outweigh the harm.
 - **Undesignated sites**
Development affecting sites that are not formally designated, but which make a positive contribution to biodiversity, will be required to take into account their current or potential role in the Borough's wider biodiversity network.
10. All applicants are expected to assess the impacts of their proposals on biodiversity, including indirect impacts such as recreational activities, the cumulative impact of developments and any potential effects on functionally linked land to the respective site. Applicants will be required to undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards. These will be required to support and inform development proposals that would affect sites for nature conservation, protected species, or species and habitats of principal importance demonstrating development will deliver a net gain.

Delivering WNJCS:
Policy BN2 (Biodiversity)

POLICY 29A

SUPPORTING AND ENHANCING BIODIVERSITY

- A. The Council will require all development proposals to provide a net gain in biodiversity through the creation or enhancement of habitats by:
 - i. Incorporating and enhancing existing biodiversity features on and / or off site;
 - ii. Consolidating, developing and enhancing functionality of ecological networks including those beyond the Local Plan's boundary; and
 - iii. Managing, monitoring and maintaining biodiversity within a development.
- B. Proposals should enhance natural capital and be designed around the existing components of the ecological network including sites of national or international importance, sites of local importance and other biodiversity assets.
- C. All applicants are expected to assess the impacts of their proposals on biodiversity, including indirect impacts such as recreational activities. Applicants should have regard to the Northamptonshire Biodiversity Action Plan and the latest guidance on biodiversity net gain when developing proposals. The Council requires applicants to use a recognised biodiversity calculator such as the DEFRA metric.
- D. Development that does not achieve biodiversity net gain, and fragments habitats and links will be refused.

Delivering WNJCS:

Policy BN2 (Biodiversity)

POLICY 29B
NATURE CONSERVATION

- A. The Council requires development to protect, maintain and enhance biodiversity and geodiversity. All proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment. If harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for, planning permission will be removed.
- B. Proposals should have regard to principles set out in the Northamptonshire Biodiversity SPD or successor document and where necessary undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards to inform development.
- C. The Council will seek the protection or enhancement of the ecological network in proportion to the site's designation status, the contribution it makes to the ecological network and take account of considerations set out below:
 - i. **Sites of national or international importance** – Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest are of international and / or national importance and development affecting them will be expected to avoid causing adverse effects.
 - ii. **Sites of local importance** – Development affecting Northampton's Local Nature Reserves, Local Wildlife Sites, Local Geological Sites and Potential Wildlife Sites will be expected to avoid causing adverse effects on these assets unless it can be demonstrated that the benefits of development clearly outweigh the harm.
 - iii. **Other biodiversity assets** – Development affecting sites that are not formally designated, but which make a positive contribution to biodiversity, will be required to take into account their current or potential role in Northampton's wider biodiversity network.

Delivering WNJCS:
Policy BN2 (Biodiversity)

Upper Nene Valley Gravel Pits Special Protection Area

10.16 The Upper Nene Valley Gravel Pits were designated as a Special Protection Area (SPA) in 2011 for their international importance as a wetland habitat for nonbreeding waterbirds. Unit 1 of the SPA is located within the south eastern part of

Northampton and is known as the Clifford Hill Gravel Pits or Northampton Washlands. It has also been included on the list of wetland sites of international importance (Ramsar sites) and is a Site of Special Scientific Interest (SSSI).

10.17 The Upper Nene Gravel Pits Special Protection Area (SPA) Supplementary Planning Document⁶⁶ (SPD) was adopted by West Northamptonshire Council in November 2021 the Council in 2015 and supplements the policies contained in the West Northamptonshire Joint Core Strategy (WNJCS). It highlights the requirement to consult Natural England on proposals that could affect the SPA and details consultation zones for different types of development. It should be referred to when preparing development proposals. A mitigation strategy has also been adopted (March 2022) will be prepared for the Upper Nene Valley Gravel Pits SPA which is appended to the above SPD. with a view to its subsequent adoption as an addendum to the SPD. It will advise applicants and ensure that development (standalone and cumulative) does not impact negatively on this biodiversity asset. This document will be adopted by produced within 12 months of the time of the adoption of the Northampton Local Plan Part 2. However, the broad principles and a draft of the mitigation strategy agreed with Natural England will be prepared prior to the adoption of the local plan.

10.18 Since the adoption of the WNJCS, Natural England has continued to monitor visitor pressure on the SPA. Evidence⁶⁷ shows that new housing within 3km of the SPA has increased recreational pressure, contributing to disturbance of 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. With the amount of potential development being progressed within the vicinity, Northampton Borough Council will prepare an appropriate mitigation strategy to prevent additional pressure and disturbance to the birds. The strategy will draw on evidence of existing recreational impact and forecast additional impact from proposed residential growth, it will then identify suitable mitigation measures such as access management and monitoring to minimise impact on the SPA. Without mitigation, any increase in the number of residential units near the SPA has the potential to increase the significance of the effect by increasing the number of visits to the designated site. To protect the SPA from recreational pressure as a result of residential development the mitigation strategy identifies a number of measures including provision of information panels and wardening of the SPA to educate visitors. Residential development is required to pay a Strategic Access Management and Monitoring (SAMM) contribution and / or provide bespoke mitigation to protect the SPA.

⁶⁶ Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document (Northampton Borough Council, August 2015)

⁶⁷ Natural England consultation response (June 2016)

10.19 Mitigation may involve:

- Development of and implementation of habitat and access management plans within the SPA
- Improvement of existing greenspace and recreational routes
- Provision of suitable alternative natural greenspace and recreational route
- ~~Monitoring of the impacts of new development on the SPA to inform the necessary mitigation requirements and future refinement of any mitigation measures~~

10.20 Other significant adverse effects such as loss or fragmentation of habitats and change to water quality can also arise from development. In addition, there could be impacts on areas of functionally linked land which support the bird species (golden plover and lapwing) for which the Upper Nene Valley Gravel Pits SPA has been designated. As such developers should engage early with Natural England regarding their proposals. For example, for sites in close proximity to the SPA, consideration should be given to phasing the construction period, whereby the most intensive/ noisy part of development avoids the sensitive winter season (1st October – 31st March inclusive).

10.21 Proposals directly impacting on green infrastructure connected to the Upper Nene Valley Special Protection Area are required to engage with the community to promote awareness and understanding of the important of the SPA.

POLICY 30

UPPER NENE VALLEY GRAVEL PITS SPECIAL PROTECTION AREA

Proposals must ensure that there is no adverse impact either alone or cumulatively on the Upper Nene Valley Gravel Pits SPA and Ramsar site.

Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.

Where development is likely to have significant effects on the Upper Nene Valley Gravel Pits Special Protection Area, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the SPA Supplementary Planning Document.

~~Applications comprising a net gain in residential units within 3 km of the Upper Nene Valley Gravel Pits SPA and Ramsar site will, in combination, have an adverse effect on the integrity of the SPA if not mitigated. need to demonstrate that the impact of any increased recreational activity or pet predation (indirect or direct) on the SPA and Ramsar site will not have a detrimental impact.~~

~~The Local Planning Authority has adopted a mitigation strategy for Unit 1 of the Upper Nene Valley Gravel Pits SPA which must be referred to when preparing an application that is located within 3km of Unit 1 of the SPA. Residential development will be required to pay a Suitable Access Management and Monitoring (SAMM) contribution and / or provide bespoke mitigation such as a Suitable Alternative Natural Greenspace (SANG) in order to mitigate recreational impact.~~

~~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~~

~~Other adverse effects could include the loss or fragmentation of functionally linked land supporting habitat, non-physical disturbance (noise, vibration or light), and impacts due to water runoff. Sites that could potentially be functionally linked land associated with the SPA will need to undertake overwintering bird surveys early in the planning process ahead of submitting an application., 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.~~

~~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.~~

In order to protect sightlines for birds included within the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar site, new development within a 250m zone of the Special Protection Area and Ramsar site shown on the policies map must undertake an assessment to demonstrate that it will not have a significant adverse effect on birds within the area or, if directly adjacent to existing buildings, should reflect surrounding building heights.

Delivering WNJCS: Policy BN4 (Upper Nene Valley Gravel Pits Special Protection Area)

Heritage and Historic Landscapes

10.22 Heritage assets, which can range from landscapes and historic street patterns to modest tombstones, make a positive contribution to the character of a place.

Their protection and enhancement can stimulate regeneration, resulting in economic and environmental benefits derived in part from people's capacity to access, enjoy and learn. They are a finite non-renewable resource which can be irreparably damaged by insensitive change to the asset or its setting.

10.23 For Northampton, they are a valuable resource which tell the story of the town, enabling people to appreciate how the town developed and evolved over time as well as the experiences encountered by residents at that specific time. For example, Delapre Abbey and Delapre Park provide a whole host of historical information. Delapre Abbey, built in 1145, accommodates one of only two Cluniac nunneries ever built in England. The funeral cortege of the body of Queen Eleanor, wife of King Edward I, stopped in only 12 places as it made its way from Lincoln to Westminster. One of the 12 places was Northampton, where the Eleanor Cross now stands. This is one of only three surviving Eleanor Crosses and was erected in the 1290s.

10.24 The four town centre conservation areas contain architectural and historical assets which are of significance to Northampton. Included in one of the conservation areas is the town's Market Square, which has remnants dating back to the late 17th century.

10.25 Northampton has over 500 listed buildings, 21 conservation areas, 7 scheduled ancient monuments and a Registered Battlefield. The Council is also collating a list of non-designated heritage assets that will be assessed against an agreed set of criteria and which are supported by an independent panel. The protection and appropriate management of these assets will assist in ensuring they survive and contribute towards sustaining the character and local distinctiveness of Northampton.

10.26 There is a need to set out a positive strategy for the conservation, enjoyment and enhancement of the historic environment as mentioned in Government guidance. The most appropriate way of managing heritage assets is to have a thorough understanding of the historic significance of the asset(s) and their setting, as well as the wider context of which they form part. This will assist in informing how development proposals are to be considered. All proposals should be developed consistent with guidance from Historic England and heritage best practice.

10.27 Northampton's geography and historic development has provided a legacy of over 1,670 ha of parks, open spaces and other green areas. The natural and manmade 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. Examples include Abington Park, Delapre Park,

Hunsbury Hill Country Park and the Racecourse. Added to these are the Special Protection Area/ Ramsar site at the Upper Nene Valley Gravel Pits, 6 Local Nature Reserves, over 50 Local Wildlife Sites, over 70 potential wildlife sites and 8 Geological sites. Collectively, these provide a diverse assembly of green spaces which contribute to Northampton's local character and sense of place.

10.28 A study⁶⁸ commissioned by the Council articulates the role that these urban fringe landscapes play in terms of:

- Recognising the intrinsic value of landscape in their own right, and also landscapes that make a strong contribution to the historic significance and setting of historic assets
- Opportunities for helping to protect and enhance local landscape distinctiveness through mitigation of development led change and appropriate land management practices
- Opportunities for restoring areas where the landscape character has been eroded or compromised by inappropriate or insensitive past development

POLICY 31

PROTECTION AND ENHANCEMENTS OF DESIGNATED AND NONDESIGNATED HERITAGE ASSETS

The Council will require development proposals to conserve and enhance the historic environment and designated and non-designated heritage assets, including historic landscapes, by:

- i. Ensuring that development proposals demonstrate a clear understanding of the significance of the asset and its setting, and the impact the scheme will have on that significance
- ii. Ensuring that this enhanced understanding has been considered and incorporated into the development proposal demonstrating how the scheme preserves and/ or enhances the asset
- iii. Requiring a clear and convincing justification for any harm or loss of an asset, supported by demonstrating how harm is outweighed by public benefits
- iv. Supporting high quality proposals which positively considers Northampton's local distinctiveness including aspects associated with siting, scale, massing, layout, form, materials and architectural detailing
- v. ~~Being consistent with Having regard to~~ guidance from Historic England and heritage best practice

⁶⁸ Northampton Urban Fringe Landscape Character & Sensitivity Study (Chris Blandford Associates, November 2018)

Proposals which will result in an increased and/ or improved accessibility to heritage assets will also be supported.

**Delivering WNJCS:
Policy BN5 (The Historic Environment and Landscape)**

CHAPTER 11: MOVEMENT

Overview

11.1 The transport network within and connecting to Northampton the Borough requires developing in the form of enhancement and expansion in order to accommodate the growing demand, but in a way that is consistent with addressing the Council's target of achieving carbon neutral development by 2030 and the need to encourage people to have active lifestyles as part of the drive towards improved public health.

11.2 A range of transport schemes have been identified by the Council, the Highway Authority and transport providers which will evolve over the Local Plan period. The West Northamptonshire Joint Core Strategy also provides strategic policies which support the retention and enhancement of strategic connections (rail, roads and water) and sets out the requirements to achieve modal shift and mitigate the impacts of developments on the highway network.

11.3 The Council will support planned growth and existing development with appropriate transport infrastructure, including for sustainable modes of travel and safety improvements. The Council will work together with the highway authority, Highways England, public transport operators, developers 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 (see Appendix C).

11.4 The Northamptonshire Transportation Plan⁶⁹ sets out the County Council's policies, objectives and vision for transport in Northamptonshire up to 2026. It is supported by a range of specialist strategy documentation which as a whole form the Local Transport Plan for Northamptonshire. The LTP has six main objectives including the creation of a transport system that supports and encourages growth and plans for the future impacts of growth, whilst successfully providing benefits for the County. Also, they aim to ensure that people have the information and options available to enable them to choose the best form of transport for each journey that they make.

11.5 The Northampton Low Emission Strategy (NLES; 2017-2025) sets out an integrated, long-term plan to improve air quality. It aims to achieve a reduction in vehicle emissions by accelerating the uptake of cleaner fuels and technologies. The Plan considers what needs to be done to shape the places where we live and work, how we travel and the choices we make so that low emission travel becomes part of life.

⁶⁹ Northamptonshire Transport Plan: Fit for Purpose (Northamptonshire County Council, 2012)

11.6 ~~Northampton Borough~~ West Northamptonshire Council is currently developing the Northampton Electric Vehicle Plan (NEVP), which will form part of the NLES. This document will outline key objectives, policy mechanisms and practical measures to help assist the accelerated growth in plug-in technology and secure inward investment as part of a transition to a low emission economy. This includes adopting a taxi emissions policy and to explore the possibility of installing a rapid EV charging network in Council owned and operated car parks.

Managing Northampton's Transport and Movement

Delivering Sustainable Transport

11.7 In line with Government guidance and the strategic policies contained in the West Northamptonshire Joint Core Strategy, the potential impacts of development on transport networks need to be addressed, such as an increase in noise for nearby residents and a negative impact on air quality. It is important to manage the impacts of growth, promoting opportunities for utilising sustainable modes of movement including supporting public transport provisions (trains, buses and taxis), and walking and cycling routes. These need to be considered alongside appropriate mitigation associated with the environmental impacts of traffic and transport infrastructure.

11.8 New developments are also expected to contribute to Northamptonshire's ~~County Council's~~ modal shift objectives, which are a 5% reduction in the share of private car trips across existing developments and a 20% reduction in the share of private car trips from all new developments.

11.9 The Council's Low Emission Strategy⁷⁰ (LES) aims to improve air quality and health across Northampton by reducing vehicle emissions through the accelerated take up of cleaner fuels and technologies and the implementation of mitigation measures in new developments. Evidence for the strategy found that whilst levels of nitrogen dioxide have improved in some areas of Northampton, concentrations of NO₂ and particulate matter (specifically PM 10s) at key locations have remained elevated over the last decade and at some locations, concentrations have increased resulting in declarations of Air Quality Management Areas. ~~NBC~~ Northampton Borough Council has revoked two Air Quality Management Areas designations where NO₂ levels have improved.

11.10 There are currently seven Air Quality Management Areas (see Figure 17). These are areas which exceed the Government's air quality objective and where there is relevant exposure to the public. ~~NBC and NCC~~ West Northamptonshire will also undertake a detailed assessment of current and future air quality to 2025, taking into account predicted traffic growth in Northampton the Borough. In addition, the

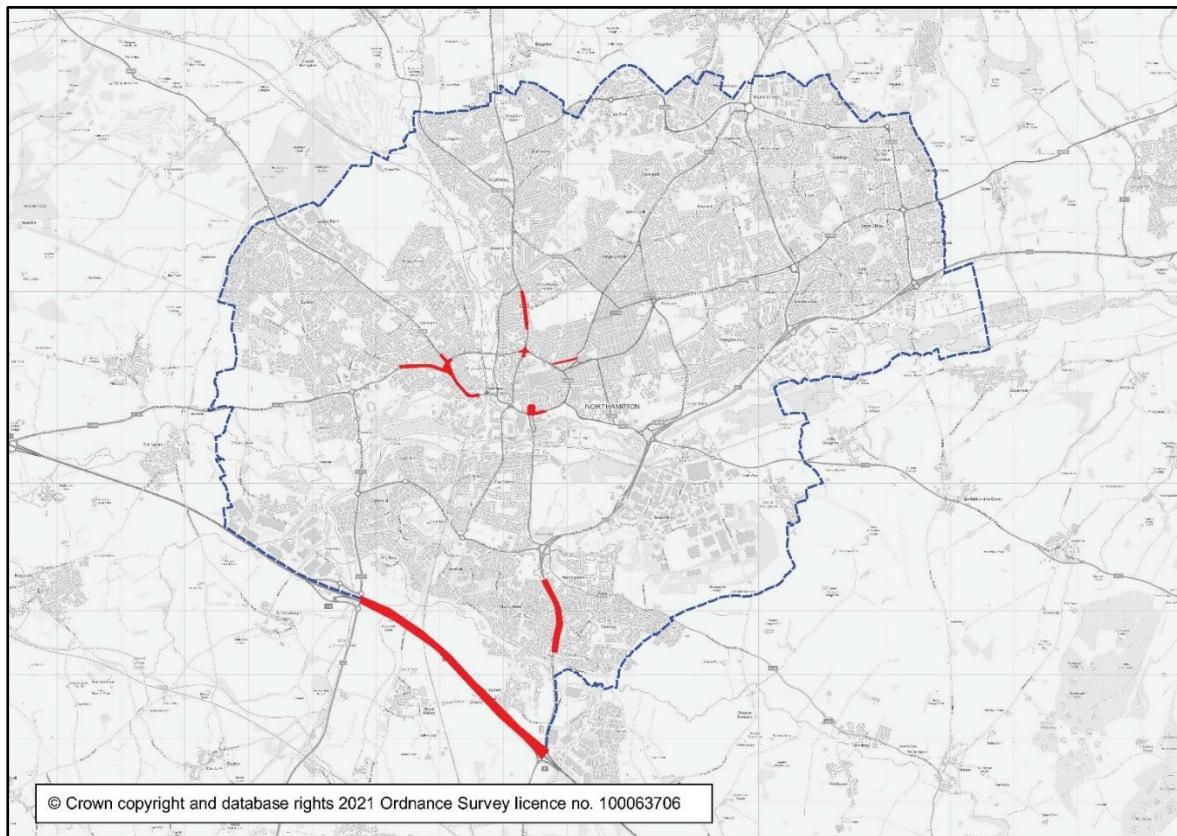
⁷⁰ Northampton Low Emission Strategy 2017 – 2025 (Northampton Borough Council, December 2017)

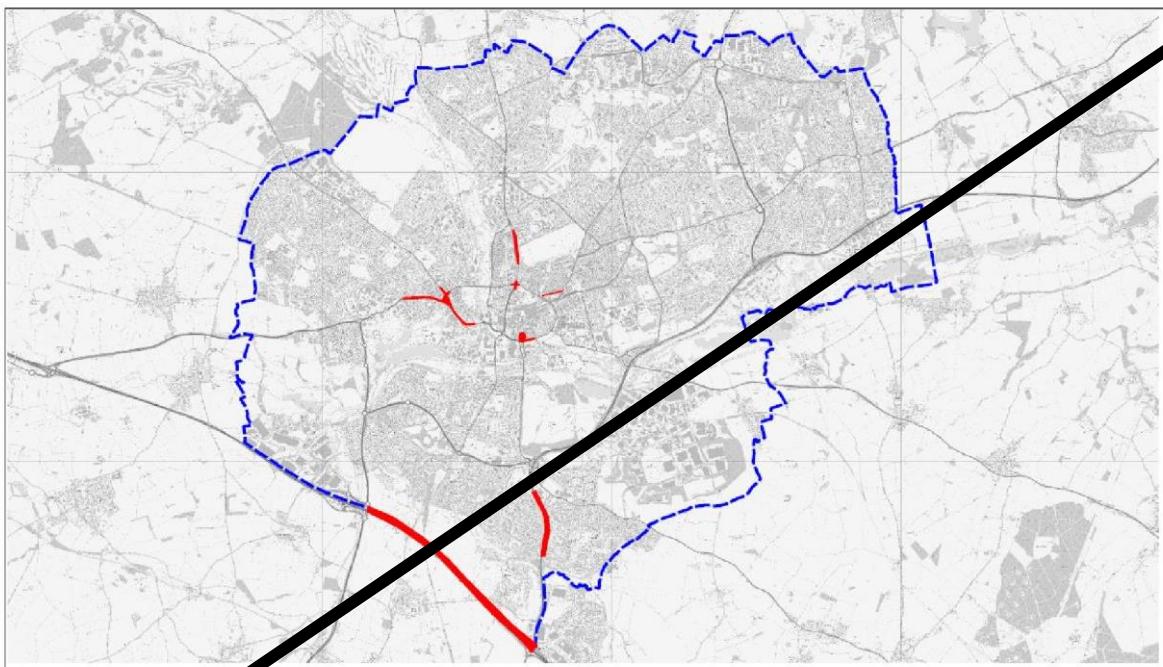
Borough Council is working on the development of a new town centre air quality management area which is planned to cover the central area of the town and the inner parts of the main arterial routes and Kingsthorpe. It is anticipated that this will ultimately replace five of the seven current AQMAs.

11.11 New developments are also expected to contribute to increasing the number of plug-in vehicle re-charging points as set out in the LES.

11.12 Facilities for walking, cycling and public transport and the charging of electric vehicles should be designed into schemes in an integrated manner at the start of the design process.

Figure 17: Locations of Air Quality Management Areas





Air Quality Management Areas

26 November 2019

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POLICY 32 DESIGNING SUSTAINABLE TRANSPORT AND TRAVEL

In order to deliver high quality, accessible sustainable transport network, the Council will require developers to fund and financially contribute towards a range of transport schemes through the relevant legal agreements and planning conditions, in order to meet the growth requirements of this local plan, to mitigate the impacts of developments and to ensure they create a high quality, sustainable, accessible development that is well connected to the rest of the Borough.

- A. In order to deliver a high quality, accessible and sustainable transport network proposals will be required to deliver or contribute to the infrastructure projects contained within Appendix D of this Plan which are necessary to make them acceptable as per the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (or subsequent policy / regulations).

~~All major applications will also be required to include a Travel Plan. Applicants will be required to demonstrate that they can mitigate the proposal's transport impact either on site or off site.~~

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

- i. To promote, improve and encourage active lifestyles and health and wellbeing
- ii. To promote modal shift away from and reduce car usage
- iii. To improve accessibility by, and usability, of sustainable transport modes including public transport
- iv. To maximise opportunities for integrated secure and safe walking and cycling routes which connect to the existing network (including public rights of way), as well as open spaces and green infrastructure
- v. To secure a high quality design of the street scene which creates a safe, secure and pleasant environment
- vi. To upgrade and improve the existing street scene
- vii. To design developments including the provision of streets, streetscapes and open spaces which enable and encourage children to walk, cycle and play within their local environments
- viii. To promote sustainable travel to day-to-day destinations including the town centre, the railway station, the bus station, places of work, schools and colleges, health facilities and local leisure and recreation facilities
- ix. ~~To provide electric vehicle re-charging points in line with Policy 34 and Policy 35~~

~~Major new developments of 10 dwellings or more, or 0.5ha or more, must include a long-term management strategy (travel plan) for integrating proposals to promote and encourage sustainable travel and reduce greenhouse gas emissions, including travel planning for new users.~~

C. Applications for major new developments will need to be accompanied by a Travel Plan. The Travel Plan needs to specify a long-term management strategy for integrating proposals to promote and encourage sustainable travel and reduce green house gas emissions. This will include travel planning for new users. Applicants will need to demonstrate that they can mitigate the proposal's transport impact either on site or off site.

D. Development in the town centre will be expected to contribute towards the creation of new public routes and the facilitation of access, circulation and ease of use.

Delivering WNJCS:
Policy C2 (New Developments)
Policy N12 (Northampton's Transport Network Improvements)

Securing Highway Safety

11.13 The West Northamptonshire Joint Core Strategy is clear that the design of new developments is an important factor in influencing travel behaviour. However, in considering the design of new developments, there is a need to take into consideration the impacts on the highway network in terms of safety.

POLICY 33
HIGHWAY NETWORK AND SAFETY

Subject to consideration of all other relevant plan policies and material considerations, development proposals will be permitted provided:

- i. There would be no unacceptable impacts on highway safety and that the residual cumulative impacts on the road network are not severe. adverse impacts on the local and/or strategic transport network which cannot be mitigated against. Major planning applications and All development proposals that generate a significant number of traffic movements must be accompanied by a Transport Assessment or Transport Statement; and
- ii. They are designed to allow safe and suitable means of access and site operation.

Delivering WNJCS:
Policy C2 (New Developments)
Policy N12 (Northampton's Transport Network Improvements)

Managing an effective network

11.14 The West Northamptonshire Joint Core Strategy is clear that West Northamptonshire's strategic road and rail connections have made the area economically attractive. To ensure that the network remains efficient and capable of serving future demand, improvements need to be supported and carefully managed.

Mitigation is key to ensure that capacity is enhanced without having unacceptable consequences.

11.15 There is a range of planned and potential future transport projects that will take place during and beyond the Local Plan period including the Brackmills &~~and Northampton Castle~~ Station Corridor improvements, the North West Relief Road, the Northern Orbital Route, the Northampton Growth Management Scheme affecting the A45 and the dualling of the A43 from Northampton to Kettering. In addition, a number of strategic opportunities have been identified that have the potential to improve the range of destinations served by direct trains from Northampton and to improve access between cities to the north of Northampton, Northampton and the wider OxfordCambridge Corridor. ~~Accordingly, the route of the former Northampton to Market Harborough railway has been safeguarded as a potential transport corridor.~~

11.16 The former Northampton to Market Harborough railway line now plays a significant role in the biodiversity network of Northampton and beyond, with a series of identified Local Wildlife Sites (LWS) located within / alongside it due to the species rich neutral grasslands (a Priority Habitat under the Natural Environment and Rural Communities Act, 2006) found within them, as well as itself, being a wildlife corridor. Any reopening of the former Northampton to Market Harborough railway line will be led by Network Rail and will need to be subject to relevant studies that consider alternative options and provide justification for the most sustainable option, bearing in mind its high biodiversity status. If further evidence emerges that the future use of this link for transport is viable, the use of this route will need to be investigated in a future local plan review.

11.17 A safeguarded corridor between Brackmills and ~~Castle~~ Northampton Station is identified for use as a continuous public transport, cycling and/or walking route. The Council needs to safeguard the land required for transport-related developments to be progressed. Any proposals affecting this corridor should mitigate against the potential adverse impacts on biodiversity, and seek to secure net gain, in compliance with the relevant policies in this local plan. If further evidence emerges that the future use of this link for transport is viable, the use of this route will need to be investigated in a future local plan review.

11.18 Through the Road Investment Strategy, the UK government has allocated a ring-fenced £100 million for an Air Quality Fund available through to 2021 for Highways England to help improve quality on its network and improve air quality. ~~NBC~~ The Council has designated an AQMA along the M1 corridor and will be working in partnership with Highways England to implement measures to reduce the impact of emissions from the motorway traffic on the affected communities.

11.19 In order to deliver a high quality, accessible sustainable transport network, the Council will require developers to fund and financially contribute towards a range of transport schemes through the relevant legal agreements and planning conditions, in

order to meet the growth requirements of this local plan, to mitigate the impacts of developments and to ensure they create a high quality, sustainable, accessible development that is well connected to the rest of Northampton the Borough. Developments will be supported where the developer can demonstrate that they do not have a severe transport impact, that they promote sustainable forms of travel and they include sufficient mitigation measures.

11.20 The Council will also safeguard areas of land for transport and sustainable travel related developments which have been agreed for implementation during and beyond the plan period, once their precise alignment has been defined.

POLICY 34

TRANSPORT SCHEMES AND MITIGATION

- A. The routes of the former Northampton to Market Harborough and Northampton to Brackmills railway lines, as shown on the Policies Map, is safeguarded may be investigated for future transport use in a local plan review.
- B. Proposals for schemes which are likely to cause pollution or likely to result in exposure to sources of pollution or risks to safety will need to demonstrate that they provide opportunities to minimise and where possible reduce pollution issues that are a barrier to achieving sustainable development and healthy communities.
- C. Proposals for future transport schemes must state how they will contribute to lowering emissions and contribute to the aim of achieving net-zero emissions by 2030.
- D. Transport schemes which provide an element of environmental protection will be prioritised. In some cases, it may be necessary to have regard to mitigation measures provide mitigation in line with table 10 of the Northampton Low Emission Strategy 2017 (or the appropriate part of a successor document) namely:-
 - i. Implementation and operation of Clean Air Zones (CAZ) or Low Emission Zone
 - ii. Development of Ultra-Low emissions Hubs and Corridors
 - iii. Northampton Electric Vehicle Plan
 - iv. Cycling Hubs
 - v. Plugged-in development and demonstration schemes
 - vi. Infrastructure for low emission, alternative fuels including refuse collection services

Delivering WNJCS: Policy C3 (Strategic Connections)

Parking

11.21 The Government states that patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places. Northamptonshire County Council adopted a Supplementary Planning Document for Parking in 2016, which has been used to determine planning applications. This has now been replaced by the Northampton Parking Standards Supplementary Planning Document produced by Northampton Borough Council.

11.22 The design of new developments will also need to change to accommodate the move towards electric vehicles, the requirement for increasing modal shift, to improve the quality of the environment and improve people's quality of life. New developments and extensions to existing developments will need to ensure they make provision for electric vehicle charging and associated infrastructure.

11.23 Subject to all other relevant local plan policies and material considerations, planning permission will be granted for proposals that meet the relevant adopted parking standards and any replacement standards formulated over the plan period. These standards include car parking, disabled parking, garage parking, visitor parking, cycle parking and storage and provision for deliveries and emergency parking. New residential and commercial developments will be required to cater for the provision and use of electric and hybrid vehicles.

POLICY 35 PARKING STANDARDS

New development must meet adopted parking standards and ~~accord with have regard to~~ the principles set out in the Parking Standards SPD, ~~including the provision of facilities for electric vehicle charging points. Proposals for tTransport schemes and major new developments should also provide a car parking management strategy.~~

Delivering WNJCS: Policy N12 (Northampton's Transport Network Improvement)

CHAPTER 12: INFRASTRUCTURE

Overview

12.1 Northampton's population growth will create an increase in the demand for key infrastructure. The Council will continue to work in partnership with adjacent councils, infrastructure providers and developers in order to assess, plan, deliver and implement the provision of the required infrastructure needed in Northampton the Borough.

12.2 The range of Infrastructure required to support and manage growth could include transport, telecommunications, water supply, sewage treatment and sewerage, flood risk and energy. As Northampton is required to accommodate 18,870 net additional dwellings and contribute to the delivery of 28,000 net additional jobs up to 2029, there will be a need to address current infrastructure deficiencies as well as planning to accommodate these proposed levels of development up to 2029.

12.3 The West Northamptonshire Infrastructure Delivery Plan⁷¹ contains details on strategic infrastructure items required to deliver growth. Summary tables showing lists of infrastructure requirements, covering transport, health, libraries and education, can be found in Appendices C to H. The Infrastructure that is required to serve the current and future needs of Northampton the Borough including developments that have been granted planning permission can be delivered and provided through a variety of organisations and mechanisms including Central Government, Highways England, South East Midlands Local Enterprise Partnership (SEMLEP) and developer contributions.

Electronic Communications

12.4 In relation to the provision of superfast broadband infrastructure, the Northamptonshire vision is for the county to be at the leading edge of the global digital economy. This therefore requires new developments to be directly served by high quality fibre networks. Access to a next generation network (speeds of greater than 30 mbs) will bring a multitude of opportunities, savings and benefits to the county. It also adds value to the development and attracts occupiers. Maximising full fibre coverage is the goal. The Council will work partners to promote faster, more reliable and more comprehensive coverage of electronic communications.

12.5 Provision of electronic communications across Northampton the borough to existing and new development is also critical to supporting continued economic development in Northampton and the wider Oxford to Cambridge Arc. There is a

⁷¹ Infrastructure Delivery Plan (West Northamptonshire Joint Planning Unit, 2017)

particular need to provide full fibre broadband and improved mobile connectivity including increasing coverage of 4G and enabling 5G access. The provision of high-quality broadband will also be important in supporting new ways of working such as flexible hours and working from home, helping to reduce pressure on the highway network and associated issues such as poor air quality.

12.6 Part R of the Building Regulations (Physical Infrastructure for high-speed electronic communication networks) require the provision of in-building physical infrastructure from the service provider's 'access point' to the occupier's 'network termination point'. Objective 13 of the Plan seeks to enhance local services and ensure technology infrastructure is adequately provided to meet the needs of people and business and to ensure that relevant utilities are provided prior to occupancy. Policy 36 ensures that in-building broadband infrastructure is connected to infrastructure provided in the vicinity. Developers will need to ensure that they have explored the connection with communications providers. This will be a conversation that needs to take place between the developer and providers at various points through the development process, starting from the earliest design and planning and on into the construction phase.

POLICY 36

ELECTRONIC COMMUNICATION NETWORKS

Proposals for 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.

Healthcare

12.7 The Northamptonshire Healthcare Foundation Trust provide care for the population of ~~Northampton Borough~~ (Northamptonshire). They deliver many of the NHS services that are provided outside of a hospital and within the community which include physical, mental health and speciality services.

12.8 The main local acute NHS Trust hospital is the Northampton General Hospital which serves ~~West Northamptonshire Borough, South Northamptonshire, Daventry~~ and provides specialist cancer services for people living in Northamptonshire, North Buckinghamshire and South Leicestershire. There are several private healthcare facilities in ~~Northampton the borough~~ as well, including St Andrew's Hospital, which provides specialist mental healthcare.

12.9 Evidence shows that some existing health care and wellbeing facilities are already short of capacity and will require expansion and also there will be the

requirement for the creation of new health and wellbeing facilities. A large amount of development is proposed within Northampton and on the edges of Northampton as part of the planned sustainable urban extensions.

12.10 Developer contributions for health care and well-being facilities and related provision will be sought and expected from developers and will be achieved through the use of Section 106 Agreements and CIL payments for the provision of improvements, extensions and the creation of new health care facilities to meet the needs of the occupants of a development.

Education

12.11 West Northamptonshire County Council is the Local Education Authority and is required to provide a sufficiency of school places to meet the needs of all children of school age that are located within its boundary. The Northamptonshire County Council had has a School Organisation Plan which covers a five-year period and their current plan covers the period 2018 to 2023.

12.12 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 growth allocated through the local plan process is expected however to place further pressure 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 funding agreements with the Secretary of State for Education. The majority of new schools delivered in Northampton will be free schools.

12.13 The funding provision for education new school places 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 Community Infrastructure Levy where schools are a 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 the development, where it is to be located and the associated cost. It will also 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.

Libraries

12.14 West Northamptonshire County Council provides the public library service in Northampton. It is important that new housing developments should contribute to mitigating its impact on existing library provision.

Infrastructure Delivery

12.15 The Council will work with its partners to ensure that funding opportunities are captured, and the required infrastructure is delivered accordingly.

POLICY 37 INFRASTRUCTURE DELIVERY AND CONTRIBUTIONS

- A. Major development proposals will be required to contribute towards the delivery of and where necessary provide land / suitable sites for any new infrastructure associated with and resulting from the scheme. Developers are also required to provide delivery of "full fibre" connectivity to new build development.
- B. These need to be funded and delivered in a timely manner. Where proposals have an impact on existing infrastructure, resulting in the need for enhancements, developers will be required to positively contribute towards its delivery.
- C. Applications for infrastructure will be required to identify and mitigate any possible impacts upon the environment. Construction activities should be kept to the minimum area required and restoration of the site must occur post-construction. Where applicants cannot demonstrate appropriate mitigation measures, the decision maker should consider imposing requirements or obligations on any consent.
- D. Funding provision will be sought from a number of mechanisms including from developer contributions and the Community Infrastructure Levy.

Delivering WNJCS:

Policy INF1 (Approach to Infrastructure Delivery)

Policy INF2 (Contributions to Infrastructure Requirements)

CHAPTER 13: SITE SPECIFIC ALLOCATIONS AND POLICIES

Development Plan Allocations

~~13.1 The West Northamptonshire Joint Core Strategy requires the development of at least 18,870 houses in the Borough and the contribution to the delivery of 28,500 jobs over its plan period which is to 2029. In addition, there are also requirements to provide for retail and leisure schemes which will continue to sustain and support economic and regeneration initiatives across the Borough.~~

~~13.2 The Council has undertaken a Land Availability Assessment (LAA), in accordance with Government's guidance and criteria, of sites and properties which may contribute to these requirements. The purpose of this assessment is to identify a future supply of land which is suitable, available and achievable for housing and economic development up to 2029. The Council is not required to identify every site, but it needs to demonstrate that it has made a robust assessment of the sources of housing land supply in order to meet its required target. In doing so, the Council has assessed all the following sites:~~

- ~~• Those that were assessed through the Strategic Housing Land Availability Assessment exercise during the production of the West Northamptonshire Joint Core Strategy 2014~~
- ~~• The safeguarded employment sites in the Northampton Local Plan 1997 and the Central Area Action Plan 2013~~
- ~~• The sites that came forward through the Call for Sites consultation in the spring of 2016~~
- ~~• Any sites that came forward following the Call for Sites consultation as requested by promoters~~

~~13.3 Following the initial LAA exercise, the Council concluded that there is sufficient land to meet the requirements of the Joint Core Strategy in terms of delivering housing and jobs growth. The Sites Consultation, held in the autumn of 2017, sought to gather opinions on the Council's decisions on the sites which will be taken forward for further investigations and those which will not. In 2018, further detailed site investigations were undertaken utilising the sites allocation methodology, which resulted in the identification of the Council's preferred options for development allocations. The investigations required a wide range of internal and external involvement ranging from the Environment Agency through to heritage specialists.~~

13.1 This plan makes allocations for housing and employment use in policies 13 and 17A. For most of the allocations, sufficient guidance on requirements for planning applications is provided by the polices in this and other development plan documents. Some sites have a number of constraints where additional policy guidance is necessary. The following sections of this plan provide this additional guidance.

POLICY 38**DEVELOPMENT ALLOCATIONS****(residential, employment, education and mixed-use)**

The sites set out below are allocated on the Policies Map for development. The Council will support the developments and proposals on these allocated sites, provided that they meet the requirements set out in the development management policies within this Plan.

0167*	Tanner Street
0168	Rowtree Road
0171	Quinton Road
0174	Ransome Road Gateway
0193	Former Lings Upper School, Birds Hill Walk
0195	Hunsbury School, Hunsbury Hill
0204	The Farm Hardingstone
0205	Parklands Middle School, Devon Way
0288*	Northampton Railway Station car park
0328	Cattle Market Road
0333*	Northampton Railway Station (railfreight)
0335	Great Russell Street / Chronicle and Echo North
0336	Site rear of Aldi, former Chronicle & Echo site
0338	Countess Road
0403	Allotments Studland Road
0594	Sixfields East
0598	Car park, Victoria Street
0629	British Timken
0657	Fraser Road
0685	Adj 12 Pennycress Place, Ecton Brook Road
0719	Car Garage Workshop, Harlestone Road
0720	Ryland Soans garage, Harlestone Road
0767	Spencer Street
0818*	St Peter's Way
0870	Sixfields, Upton Way
0903	Hawkins Shoe Factory, Overstone Road
0910	379 Harlestone Road
0931*	Sites in Green Street

0932	Southbridge Site 1
0933	Southbridge Site 2
1005	North of Martins Yard, Spencer Bridge Road
1006	Pineham
1007	Land south of Wooldale Road, east of Wootton Road
1009	Land west of Policy N5 Northampton South SUE (site 1)
1010*	Land at St Peter's Way/ Court Road/ Freeschool Street
1013	University of Northampton Park Campus
1014	University of Northampton Avenue Campus
1022	Belgrave House

1025	Land to the west of Towester Road
1026	Eastern Land Parcel, Buckton Fields
1036	Derwent Drive garage site, Kings Heath
1037	Swale Drive garage site and rear/ unused land
1041	Newnham Road, Kingsthorpe
1048	Stenson Street
1049	Land off Arbour Court, Thorplands garage block
1051a	Land between Waterpump Court and Billing Brook Road
1052	Land rear of garages in Coverack Close
1058	Land off Oat Hill Drive, Ecton Brook
1060	Hayeswood Road, Lings
1071	2 sites off Medway Drive, near Meadow Close
1086a	2 parcels of land in Sunnyside Estate (Cosgrove Road)
1086b	2 parcels of land in Sunnyside Estate (Chalcombe Avenue)
1094	Land off Holme Cross Road
1096	Land off Mill Lane
1097	Gate Lodge
1098*	The Green, Great Houghton
1099	Upton Reserve Site
1100	Hill Farm Rise, Hunsbury Hill (50% of the site)
1101	Land at Waterside Way
1102	Site east of Towester Road
1104	Watering Lane, Collingtree
1107	Former Abington Mill Farm, land off Rushmere Road
1108	Former Dairy Crest Depot, Hersley Road
1109	Mill Lane
1112	Milton Ham
1113*	Greyfriars
1114	Cedarwood Nursing Home, 492 Kettering Road
1117	133 Queens Park Parade

1121	Upton Valley Way East
1123	83–103 Trinity Avenue
1124	41–43 Derngate
1126	5 Primrose Hill
1127	32 Connaught Street
1131	The Leys Close, 39 Mill Lane
1133	Eastern District Social Club
1134	St Johns Railway Embankment
1137	Wootton Fields
1138	Land south of Old Bedford Road
1139*	Ransome Road
1140	Land north of Milton Ham
1142	Land west of Northampton South SUE (site 2)

Development proposals marked with an asterisk (*) will need to conform to the relevant site specific policies contained in policies 39, 40, 41, 42, 43 or 44, in addition to other relevant planning policies, planning objectives and other material considerations.

Delivering WNJCS: All strategic and Northampton based policies

Site Specific Policies

Northampton Railway Station, Railfreight and adjoining sites (LAA0288 And LAA0333)

13.4 Northampton's railway station currently accommodates a new two storey station building, provision for taxis and a temporary decked car park. To the north, the site is currently used for railfreight and further north is a small business area, and a café and lorry park. Also within the site is a scheduled monument and a listed building, which form part of a range of heritage assets within and surrounding the site. The southern half of the site is located within the Enterprise Zone.

13.5 To the north and south of the site are employment areas, and to the east is Spring Boroughs. To the west are a residential area and a park. The site is within 10 minutes' walk of Northampton town centre.

13.6 With a new railway station, there is an opportunity to capitalise on the site's location for development to meet future passenger requirements as well as housing and commercial development needs. Network Rail has indicated that subject to the current and future freight/ commercial operation being moved elsewhere provision of

a suitable replacement site to accommodate railfreight activities, this opens up the potential for the residual railway land to be developed. There is potential to consider a comprehensive and integrated development on this whole site, capitalising on its sustainable location on a rail network, close to the town centre and supporting modal shift. Its location also provides an opportunity for high density development to be delivered.

13.7 The railway station also needs to be able to accommodate additional services including those that may arise as a result of opportunities relating to released capacity on the West Coast Main Line, including fast, long distance services, East West Rail services and potential transport links to the north via the route of the former Northampton to Market Harborough railway.

13.8 Parts of the northern section are at moderate risk of groundwater flooding.

13.9 The Council commissioned a Heritage Impact Assessment⁷² to be undertaken for key development sites. The railfreight site is considered to have low/medium sensitivity, providing an opportunity for medium to high capacity development within its boundary. The station car park site is considered to have high/medium sensitivity to the south and medium sensitivity to the north. The site therefore has an opportunity for medium capacity development within the northern portion and low capacity within the southern development. In addition, given the high probability of archaeological remains within the site, development should only be progressed after appropriate archaeological investigation is undertaken, and that it accords to a mitigation strategy as agreed with Northamptonshire County Archaeologist and Historic England. Deep foundations such as piling may not be appropriate especially in the south of LAA0288 where they may impact upon the Castle and pre-Castle remains. Foundation position and depth may also need to be carefully considered in the northern part of LAA0288 and LAA0333 where deep cut features survive.

13.9A 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 this 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.

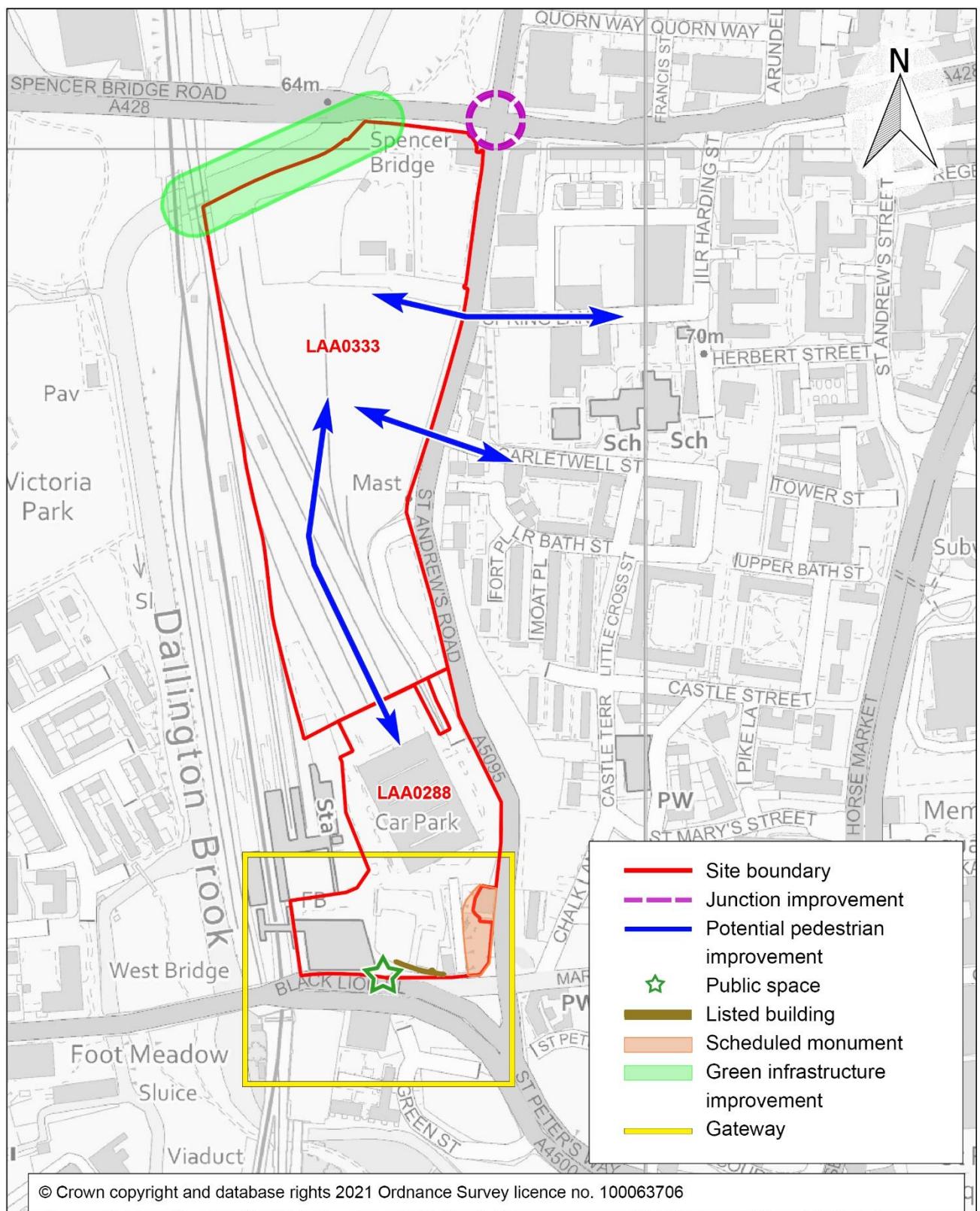
POLICY 39
NORTHAMPTON RAILWAY STATION (LAA0288), RAILFREIGHT AND
ADJOINING SITES (LAA0333)

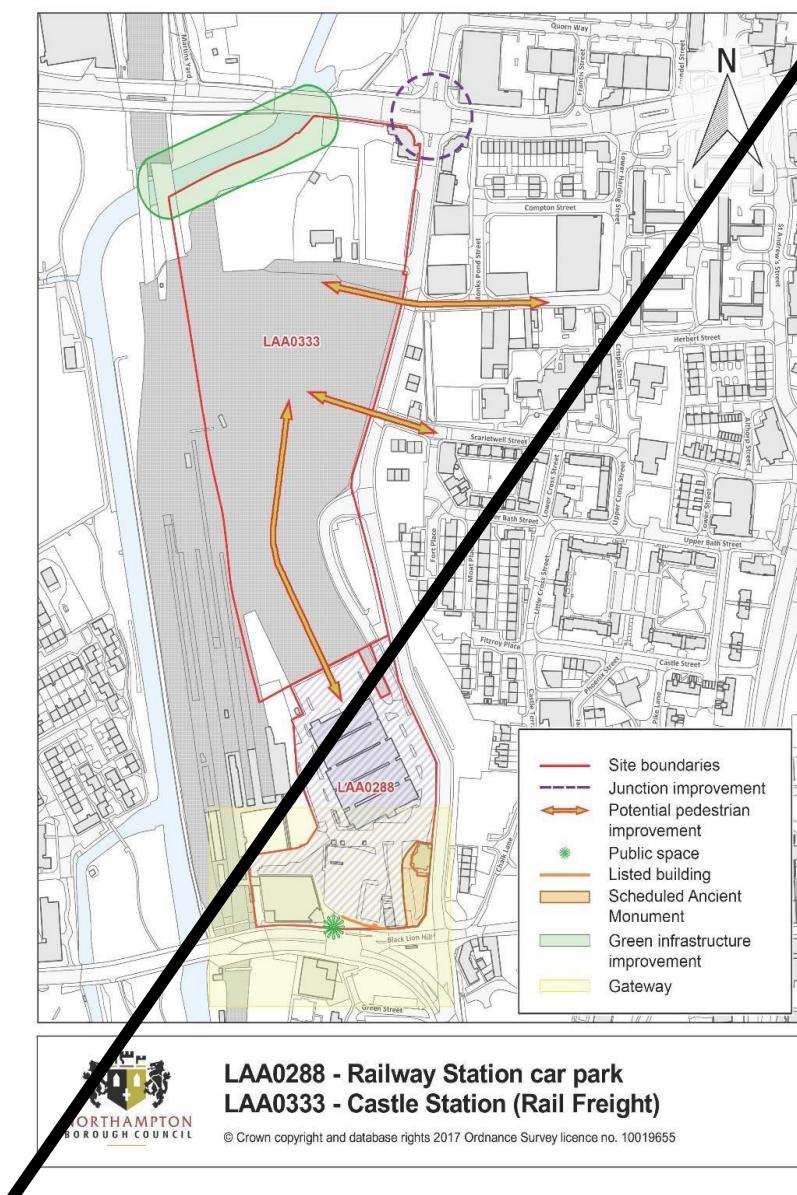
⁷² Heritage Impact Assessment (Iceni, June 2020)

- A. The existing Northampton Railway Station building and associated buildings, platforms, tracks, infrastructure, security measures, car parking and associated services and facilities will be safeguarded to ensure that the provision of current and future accessible passenger railway services to and from Northampton will be met. This will also continue to contribute towards an increased modal shift towards rail usage whilst supporting the provision of on site and related employment. These safeguarded areas will include safeguarded road accessibility to allow for 24 hour servicing and emergency access to Northampton Railway Station via St Andrew's Road.
- B. Subject to compliance with other policies in this plan and material considerations, proposals to provide additional capacity to facilitate improved passenger railway services at Northampton station will be supported.
- C. To secure the protection, enhancement and enjoyment of the character and setting of the adjacent listed building and its two adjoining listed walls that are located within the existing railway station site, public realm will be created between the heritage assets and the station building as shown in Figure 18. Any proposal should result in an improvement to the sense of arrival to the town centre.
- D. The development of a permanent and secure multi-storey car park on the Northampton Railway Station site with access to the main railway station building will be supported in order to create sufficient on-site car parking, bicycle and motorcycle parking to cater for the future growing demand of rail usage.
- E. On site LAA0288, the Council will support the delivery of mixed-use development including a multi-storey car park, offices, residential and ancillary Class A E uses.
- F. On site LAA0333, the Council will support the delivery of ~~at least 200~~ about 188 dwellings, subject to analysis of capacity, on the residual areas not required for commercial and/ or passenger rail services. Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS).
- G. Development proposals will need to provide details of how the accessible natural greenspace is to be provided at the northern end of the site. New development will also need to provide a contribution towards providing a woodland stepping stone (a connected habitat) to the north of the site.

- H. There are opportunities to improve water flow around the site by reducing surface-water runoff and introducing areas of floodplain to reduce the risk of flooding, absorb water and reduce sediment run-off through the introduction of Sustainable Drainage Systems (SuDS).
- I. The following design principles are to be incorporated into any master planning and/ or planning application proposals for the two sites:
 - i. A high quality development that preserves and enhances the significance and appreciation of the former castle site ~~and in particular the scheduled monument and listed Postern Gate and the setting of these heritage assets. , its designated components and their setting. Design and capacity will be informed by detailed archaeological investigations and assessments in advance of development.~~ The proposals should provide opportunities to enhance the significance of the identified heritage assets
 - ii. Development across the whole area needs to be considered in an integrated manner
 - iii. This high-quality development must secure permeability within the site for pedestrians and cyclists
 - iv. Improved and safe connectivity, including direct pedestrian routes, with the Spring Boroughs area and the town centre will need to be created. This will improve the relationship between the site and the town centre
 - v. Opportunities should be explored for development to enhance the site's relationship to the Brampton Arm of the River Nene.
- J. Both development proposals need to demonstrate how they are contributing to improvements in air quality in the surrounding area. Also there are opportunities to improve the water quality, particularly at the northern boundary of site LAA0333.
- K. 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 protect against pluvial flooding.
- L. The proposal should include the safeguarding of suitable access for the maintenance of foul drainage infrastructure.

Figure 18: Development Principles for Northampton Railway Station (LAA0288) and Railfreight Sites (LAA0333)





Martin's Yard Extension (LAA1005)

13.10 Martin's Yard is an employment area which is predominantly occupied by local light engineering, waste disposal and recycling companies. They provide a valuable service for the local community, and there are very few areas which offer these services in Northampton. There are ongoing requirements from existing and interested occupiers to expand and invest in the area. Its expansion will contribute towards meeting demand as well as modernise the area and improve the ecological value of the residual land not required for employment.

13.11 The area which is proposed for extension is a vacant site of around 1.4ha, which was previously used for landfill. It contains superficial deposits of clay, silt and gravel. It is currently scrubland and marshland, and is dominated by semi-improved grassland and scrub containing Japanese knotweed and disturbed ground. It is located within a Local Wildlife Site and the Brampton Valley Arm of the sub regional Green Infrastructure corridor. There needs to be careful management for the lifetime of the development to ensure that the LWS does not become degraded. To the north is the Kingsthorpe Local Nature Reserve.

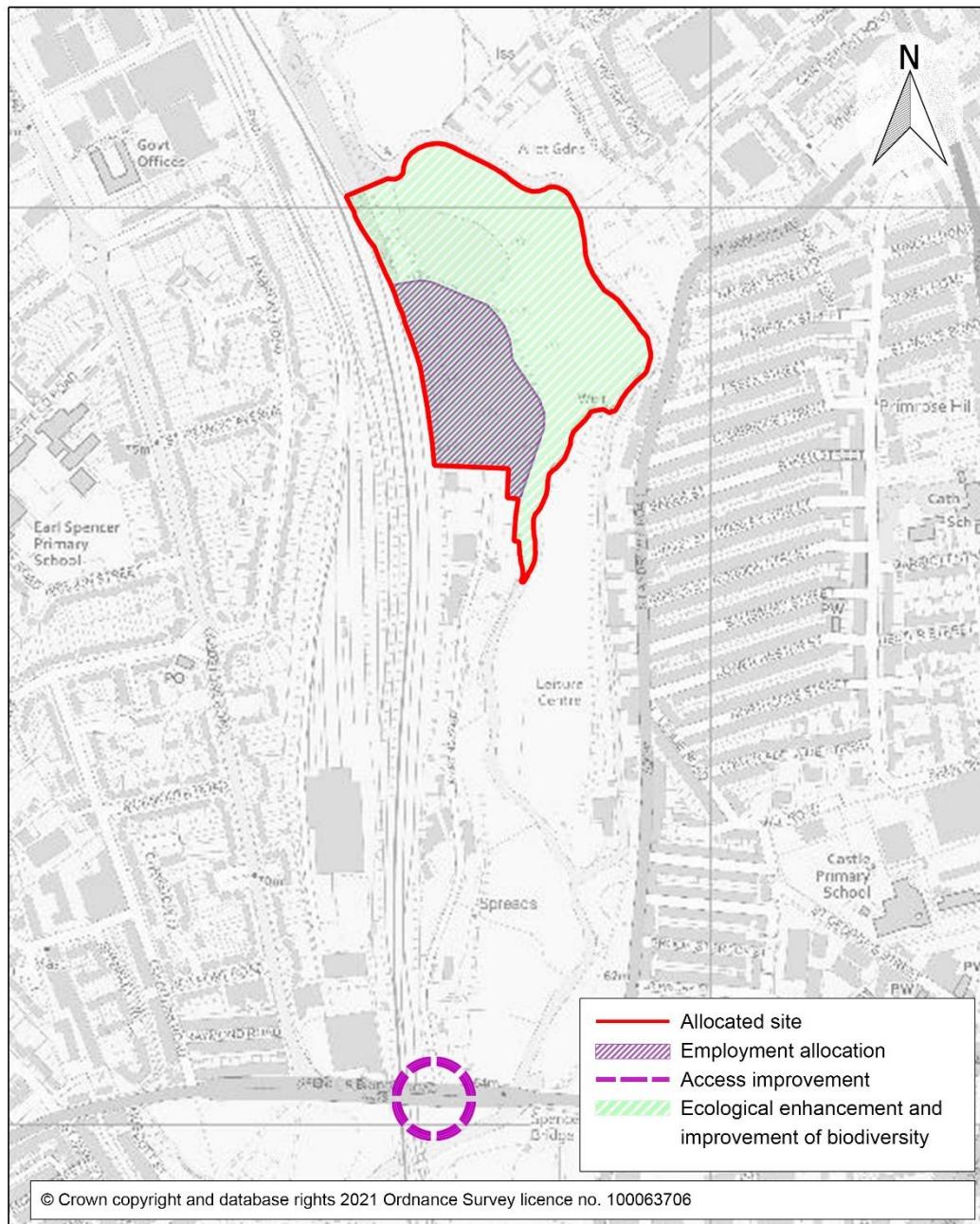
POLICY 40

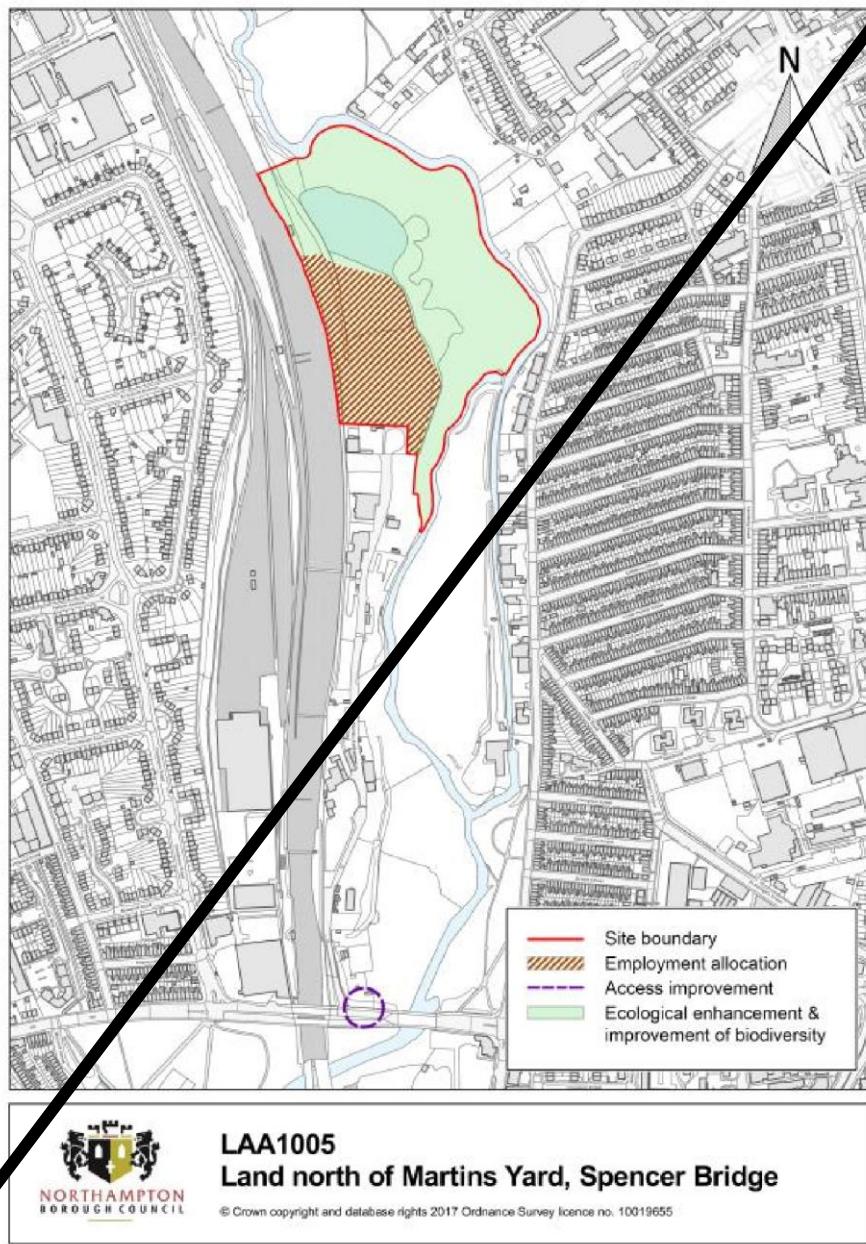
MARTIN'S YARD EXTENSION (LAA1005)

- A. The Council supports the extension of the Martin's Yard employment area for employment purposes to meet local demand, subject to the following criteria and principles shown in Figure 19:
 - i. The extension for employment use will be restricted to the area shown.
 - ii. A transport assessment will be undertaken to assess the ability of the existing highway and access to adequately cater for the existing and proposed development.
 - iii. Ecological and green infrastructure enhancements and net biodiversity gains need to be delivered in the area shown or in the site's vicinity, taking into account its location within the Brampton Valley Arm and located immediately south of the Kingsthorpe Local Nature Reserve. There are opportunities to provide woodland stepping stones (a connected habitat) adjacent to the site.
 - iv. A landscape barrier will be required between the employment area and the residual land.
 - v. The layout of the development should be designed to take into account any existing sewers and water mains within the site.
 - vi. Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS).
 - vii. Any application must demonstrate how it will improve water quality in the surrounding area.

- B. 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 protect against pluvial flooding

Figure 19: Development Principles for Land North of Martin's Yard (LAA1005)





The Green, Great Houghton (LAA1098)

13.12 The site is located to the south west of Great Houghton Village, part of which is within a Conservation Area and accommodates listed buildings. It lies to the east of the South of Brackmills Sustainable Urban Extension. This is primarily agricultural land, which can be accessed from Bedford Road or from Newport Pagnell Road. It borders onto designated woodland area which create a buffer from Brackmills Employment Area. This agricultural land is relatively flat, and there are some electricity pylons across pockets of the site. It is therefore important to ensure that there is a reasonable buffer created between this existing village and the new development on The Green to ensure that the setting of the conservation area and its

heritage assets can be respected and protected, and the identity of the village is maintained. There will also be an opportunity to provide semi natural stepping-stones (connected habitats) adjacent to and within the site that will provide habitat links.

13.13 The allocated site is within 3km of the Upper Nene Valley Gravel Pits Special Protection Area (SPA) / Ramsar site. In accordance with the Upper Nene Valley Gravel Pits SPA Supplementary Planning Document and the West Northamptonshire Joint Core Strategy Policy BN4, development will need to demonstrate through the development management process that there will be no significant adverse effects on the integrity of the SPA and Ramsar site and the species for which the land is designated including the loss of supporting habitat. Development should be undertaken in a sensitive manner, ensuring that disturbance from construction and operational activities do not impact upon the SPA / Ramsar bird features.

13.14 The Heritage Impact Assessment concluded that the site has high/ medium sensitivity within its eastern portion and low/ medium sensitivity within its western portions. It was recommended that development should be set away from the south western boundary of Great Houghton, and an undeveloped buffer zone between the proposed development and the existing settlement is advised. The HIA adds that within the buffer zone, opportunities for ecological enhancement should be established. Great Houghton Village commands an important elevated setting on the edge of Northampton the Borough and forms the skyline for many views south. There is potential for small scale development within the eastern portion of the site but these need to remain sensitive to the surrounding context and allow for greenspace to be retained. For the medium portion, the HIA concluded that medium and small new development could potentially be accommodated without eroding positive key features and characteristics identified to the east. Development on the site will almost certainly impact on the surviving below ground archaeological assets as they will sit just below the subsoil and cut into the natural deposits. It is recommended that a programme of archaeological investigation consisting of geophysical survey and targeted evaluation trenches take place to determine the presence/ absence, nature and extent of any such remains. This should inform a mitigation strategy for any subsequent development.

13.14A 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.

POLICY 41

THE GREEN, GREAT HOUGHTON (LAA1098)

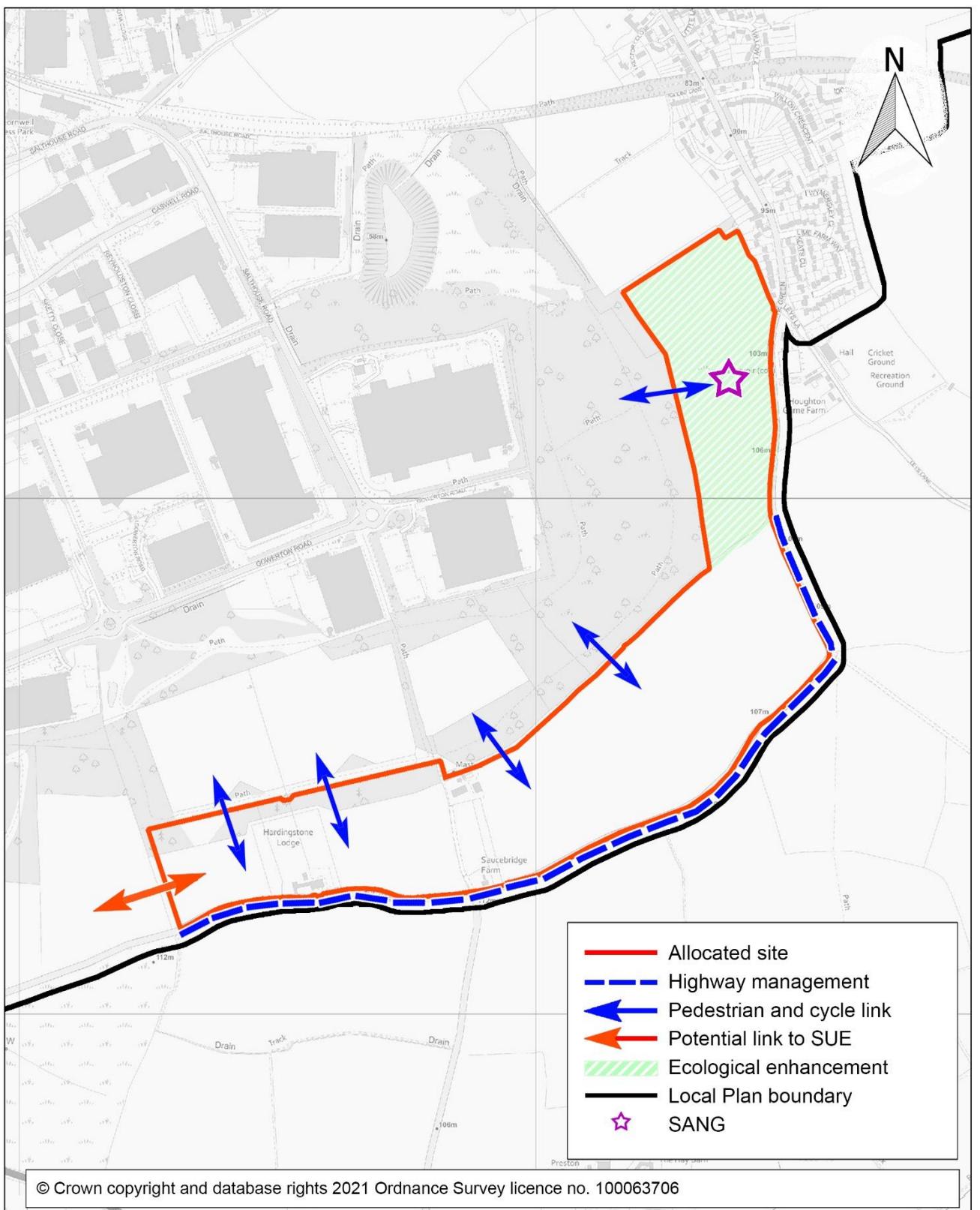
Housing development of up to about 800 dwellings, which comply with the development principles shown on Figure 20 will be supported at The Green, Great Houghton, subject to the following criteria being met:

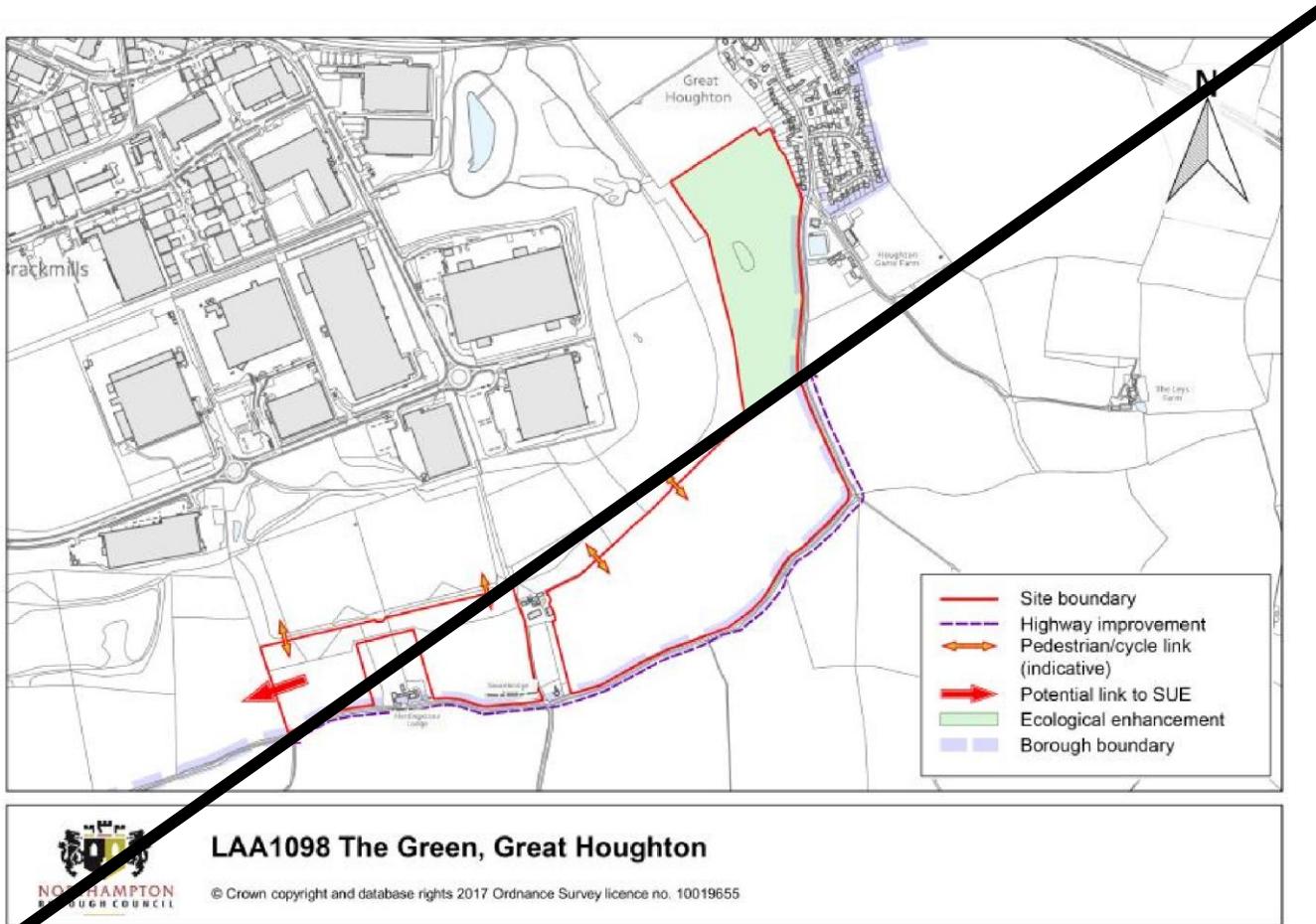
- i. ~~Winter Surveys are undertaken to determine identify whether the site is used by over-wintering Golden Plover / Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat. i.e. to be carried out in the winter. If significant numbers of Golden Plover or Lapwing are identified at the site, offsite mitigation will be required for the loss of habitat i.e. functionally linked land~~
- ii. ~~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~~
- iii. ~~Any development on this site must adhere to Policy 30 of this Plan, in particular with reference to recreational disturbance and functionally linked land associated with the Upper Nene Valley Gravel Pits Special Protection Area.~~
- iv. ~~The built development should only take place outside of the area shaded green in the diagram~~
- v. ~~The schemes 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~~
- vi. ~~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~~
- vii. ~~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. Appropriate types of habitat and accessibility are to be determined following surveys for Special Protection Area birds~~
- viii. ~~The development provides suitable transport links to neighbouring developments, including neighbourhood centres and community facilities~~
- ix. ~~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 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~~
- x. Any ~~p~~ Proposals that comes forward should include suitable measures to mitigate the impact of additional traffic generated by the development. ~~The vehicular access to the site shall not use The Green as a principal access and the development should seek to minimise additional traffic through Great Houghton village, and reduce the potential for traffic to use The Green or routes through the allocation to travel between the Newport Pagnell Road and the Bedford Road.~~
 - xi. Any proposal should also include ~~Proposals will be informed by air quality and noise impact assessments due to proximity to from the Brackmills Industrial Estate~~
 - xii. Any ~~a~~ Applications on the site will need to be accompanied by an archaeological investigation that considers any archaeological potential on the site
 - xiii. ~~Proposals must be accompanied by a landscape vision for the site including details of how views across the site into and out of the village of Great Houghton will be managed, especially views of the Grade II* listed church. The location and layout of the SANG must assist in achieving the landscape vision for the site.~~
 - xiv. Any proposal forwarded ~~Proposals~~ for this site should be accompanied by a site specific Flood Risk Assessment ~~meeting the design standard for the Upper Nene catchment through Northampton of a 0.5% probability (1 in 200 chance of occurring in any given year) event plus climate change. Surface water attenuation should be provided up to this standard. 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 protect against pluvial flooding.~~
 - xv. Subject to detailed assessment ~~(including assessment of contaminated land)~~, development on this site should maximise the use of Sustainable Drainage Systems (SuDs).
 - xvi. The safeguarding of suitable access for the maintenance of foul drainage infrastructure is maintained.
 - xvii. A suitable Alternative Natural Greenspace (SANG) will be secured.
 - xviii. Proposals must be informed by a masterplan for the whole allocation which will be expected to:
 - a. 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
 - b. Provide suitable transport links to neighbouring developments, including neighbourhood centres and facilities

- c. Manage and control vehicular access to and from the site to the northern section of The Green near to the village of Great Houghton, minimise traffic through Great Houghton and provide alternative means of accessing the site other than from The Green.
 - d. Connect the site to nearby Brackmills Country Park and surrounding areas including pedestrian and cycling provision to secure connectivity and permeability within the site, to the employment area to the north, the proposed residential areas to the west along The Green and to Great Houghton as shown on Figure 20
 - e. Provide a SANG within the area identified in Figure 20 which provides the following:
 - Protection, enhancement and / or creation of habitats in line with other policies of this plan
 - Accessibility for residents' recreation including an off-lead dog walking area
 - A circular walking route around the SANG and eastern development area
 - A clear separation between the developed site and the village of Great Houghton in order to protect its setting and the heritage assets of the village.
 - Formal and informal open space
 - A SANG car park
 - If any part of the SANG is proposed off-site, the SANG will need to be adjoining the site.
- xix. Ensure built development (other than as may relate to recreation and SANG functions) only takes place outside the SANG, the broad location of which is defined in Figure 20.

Figure 20: Development Principles for Land at The Green, Great Houghton (LAA1098)





Greyfriars (LAA1113)

13.15 The Greyfriars site is located within the town centre boundary, and is bounded by a range of mixed uses including employment and car parking facilities to the north, residential and commercial to the east, North Gate bus station and commercial to the west and south west and predominantly retail and the Market Square further south. Its location within the town centre and the proposed extension to the Primary Shopping Area makes the site as ideal for a variety of mixed town centre uses as well as an element of residential use. The site is surrounded by numerous heritage assets primarily locally and Grade II listed. These include the Grade II listed Mounts Baths, the Grade I listed Church of the Holy Sepulchre to the north west, and the Grade II listed 18th century buildings along Sheep Street. To the east of the site is the Quaker Meeting House and the former G T Hawkins Factory (part originally Hornby and West), both of which are Grade II listed buildings.

13.16 This vacant site was previously occupied by the bus station, and adjoins the Grosvenor Centre retail development area. It can be accessed from Lady's Lane and Sheep Street. There are still pockets of contaminated land on the site. This site lies within close proximity to heritage assets in the

All Saints Conservation Area and is therefore within the setting of this conservation area, as well as the Holy Sepulchre and Boot and Shoe Quarter conservation areas. Although the site can be accessed from the Grosvenor Centre, an opportunity exists to improve the connectivity and permeability of the site with its surrounding areas primarily to the north and south. The Heritage Impact Assessment 2020 also concluded that the site is likely to contain non-designated heritage assets in the form of below ground archaeological remains.

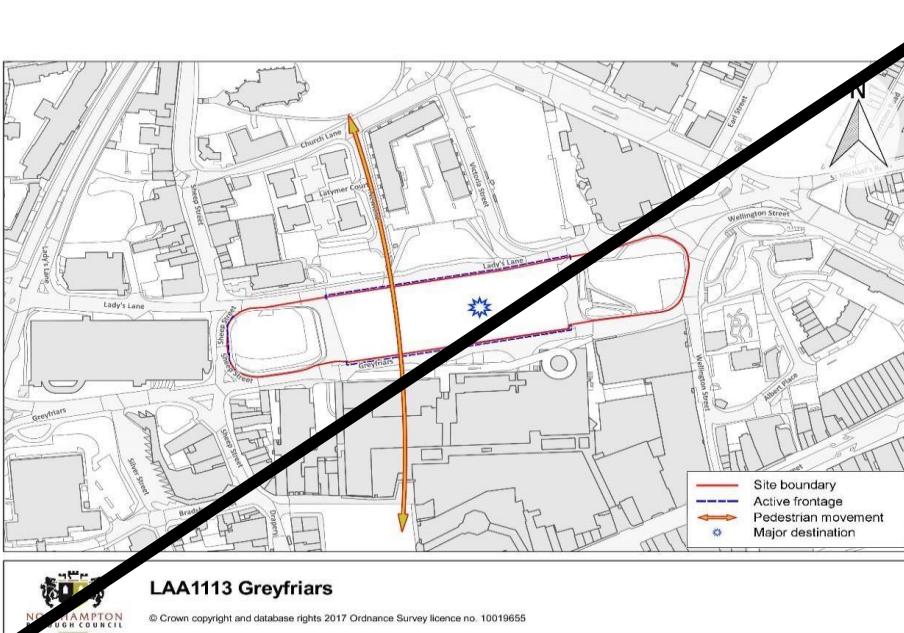
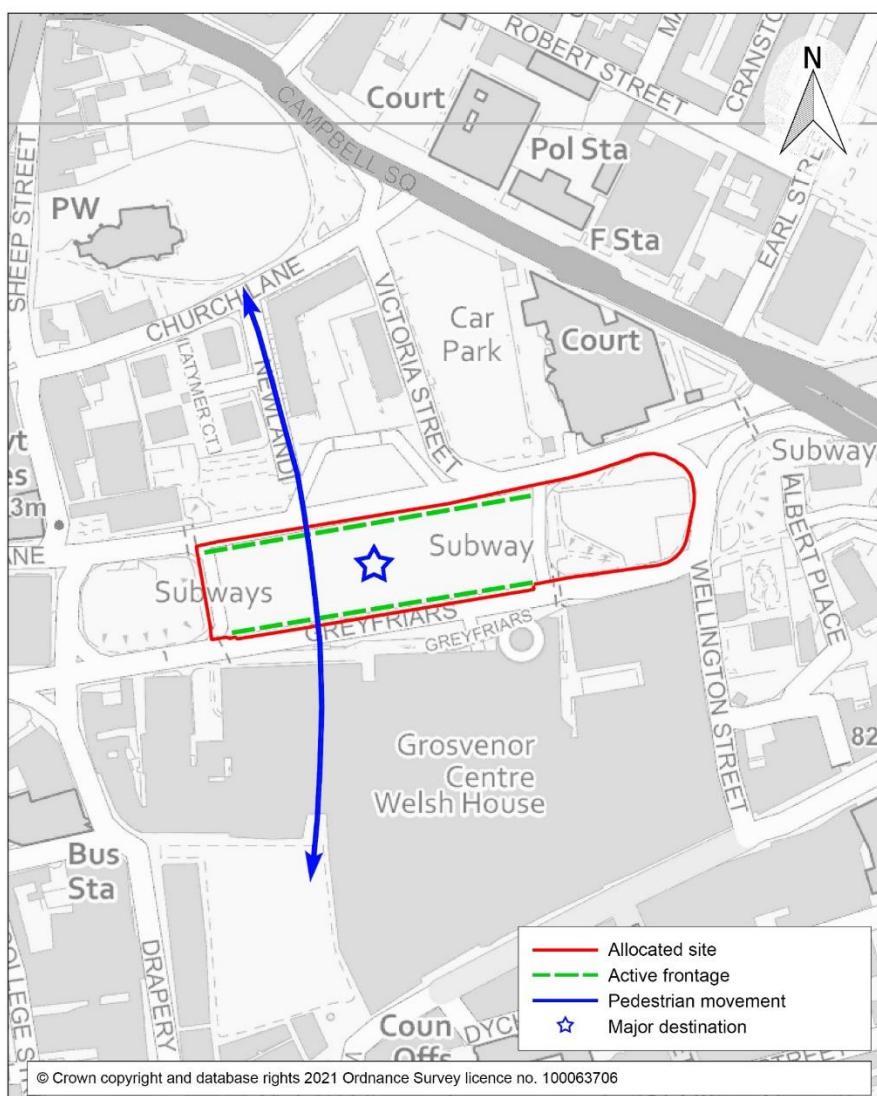
POLICY 42

GREYFRIARS (LAA1113)

- A. This key development site is available for a high density, high-quality mixed-use town centre development and residential use which complements, expands and seeks to enhance the current town centre offer and improve connectivity to the Market Square and the town centre.
- B. Any proposals should conform to the development principles shown in Figure 21 and will need to ensure that they:
 - i. Are of a high-quality design, using high quality materials which complement the surrounding area and public realm. The proposal should include the creation of key, unique landmark buildings that reflect the location of this site and Northampton town centre
 - ii. Provide sympathetic design of an appropriate scale taking into account the historic character of Sheep Street together with improved, safe and well-lit pedestrian and cycle connectivity north / south and reinstate a building line in the missing gap to the north of Lady's Lane and to the south of Greyfriars. Pre-existing surface connections should also be reinstated
 - iii. Be outward looking towards maximising external active frontages particularly at ground floor level
 - iv. Ensure that new development is well related, sympathetic and responsive to the character and heritage assets of the surrounding areas
 - v. Given the density of the surrounding development and the slightly sloping nature of the topography of the area towards the river, any new development will need to ensure that the views into and from the site are taken into consideration
 - vi. Ensure the provision of appropriate levels of secure and safe vehicle parking which are consistent with parking requirements
 - vii. Ensure that new pedestrian links and public spaces are created to better connect the site to the town centre as a whole and to improve the visitor experience

- C. The layout of new development should be designed to take into account existing sewers and water mains within the site.
- D. Any application must demonstrate how it will reduce surface water run-off in the surrounding area.
- E. Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS) to reduce the rate of surface water run-off.
- F. Any application must demonstrate how it will improve air quality in the surrounding area.
- G. 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 protect against pluvial flooding.

Figure 21: Development principles for Greyfriars (LAA1113)



Ransome Road (LAA1139)

13.17 This site is located within an area which is and will be experiencing significant regeneration activity and change. It lies immediately to the south of the Enterprise Zone, and is accessible to all the leisure activity and open spaces associated with the River Nene and its adjoining parks. The site is within 10 minutes' walk of the town centre and its Primary Shopping Area, and further opportunities exist to improve accessibility from University Drive.

13.18 The eastern section of the site is a Registered Battlefield site, and the southern and south eastern boundaries border Delapre Park Conservation Area and its historic park. Development will need to be planned in a manner which respects the significance of these assets. To the north is the safeguarded former railway line, and further north is the University of Northampton, Becketts Park and Midsummer Meadow which accommodates the Northampton marina and the Radlands Plaza skatepark.

13.19 There are areas of historic landfill and contamination on the site, particularly within the southern and eastern areas. These are primarily associated with the haulage industry, contamination from the previous engine sheds and depots, as well as earthworks. The site is also at moderate risk of groundwater flooding, and is within Flood Zones 2 and 3.

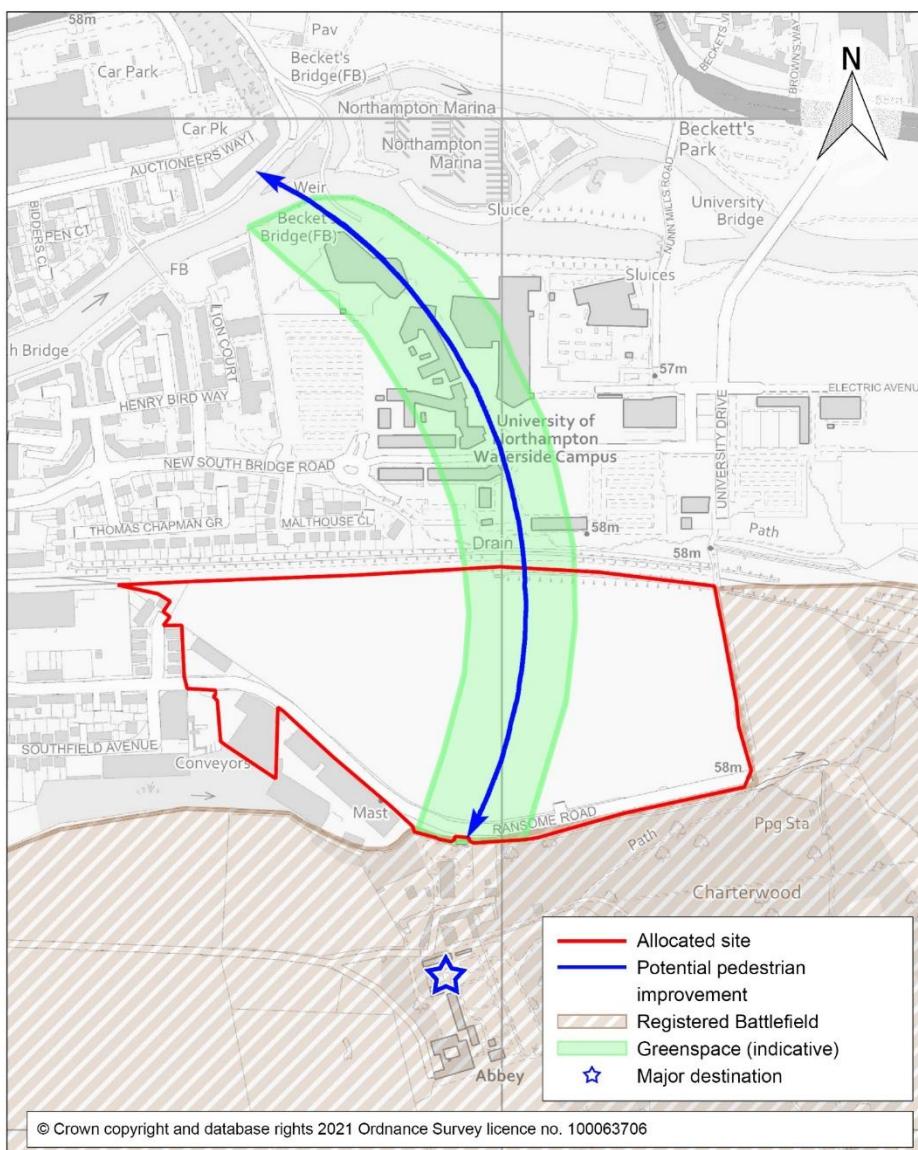
13.20 The Heritage Impact Assessment concludes that the site varies in its heritage sensitivities, with the eastern and southern sections being the most sensitive given their inclusion and proximity to the Registered Battlefield. To the north and west, the heritage sensitivity is considered to be low medium, with the least sensitive areas being the furthest from the battlefield boundary. The site was considered to have high capacity for development. The HIA adds that development on the site has potential to impact on the surviving below ground assets and that a programme of on site investigation would inform a strategy to mitigate the impact of development on any archaeological assets.

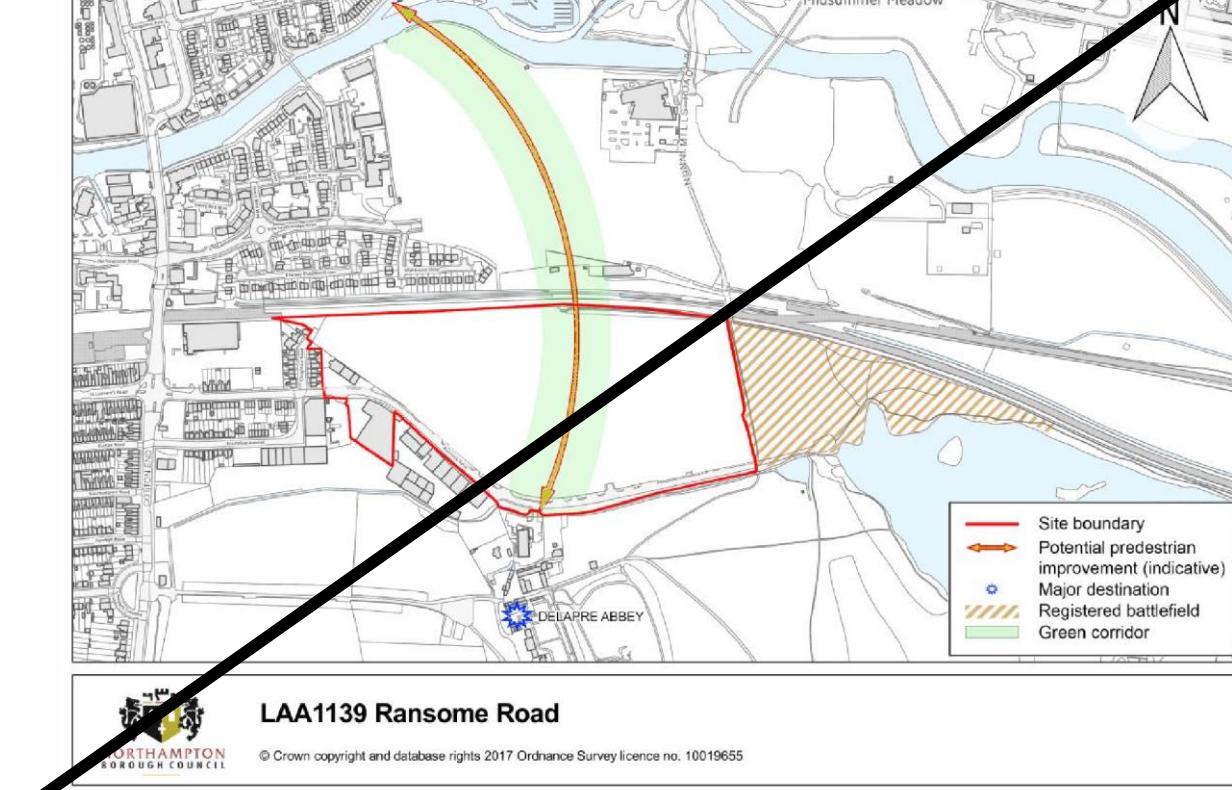
POLICY 43 RANSOME ROAD (LAA1139)

- A. Ransome Road will be developed for ~~at least 200~~ about 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:

- i. 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
 - ii. 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
 - iii. 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
 - iv. Any development should not compromise the integrity of the habitat to the north-east of the site
 - v. 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.
 - vi. Design and capacity will be informed by detailed archaeological investigations and assessments in advance of any planning application being submitted.
- B. The layout of any development should be designed to take into account existing sewers and water mains within the site.
- C. Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS) to reduce the rate of surface water run-off. Any proposal should also aim to contribute to improving water quality in the area.
- D. Any development will be expected to contribute to provision of woodland and wet grass stepping stones (connected habitats).
- E. 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 protect against pluvial flooding.

Figure 22: Development principles for Ransome Road (LAA1139)





Sites within St Peter's Way and Tanner Street (LAA0167/ 0818/ 0931/ 1010)

13.21 There are four sites which are within close proximity to each other, and developments on these sites will need to be considered in a manner in which the right types and quality of developments are secured for the town's residents, visitors and investors. These sites are:

- 0167: Tanner Street
- 0818: St Peter's Way
- 0931: Sites in Green Street
- 1010: Land at St Peter's Way, Court Road, Freeschool Street

13.22 Within these combined sites, there are heritage assets which need to be taken into account when preparing any development proposals. The heritage assets are the Scheduled Ancient Monument (SAM) within site 1010 and a locally listed building within site 0818. In addition, any development proposals will have an impact on the setting of conservation areas and listed buildings which are in close proximity to these sites. The Heritage Impact Assessment (HIA) 2020 concluded that site 0818 is considered to be suitable for commercial of medium to high capacity. Site 1010 is considered to have high sensitivity. The site is located on Saxon remains and partly designated as a SAM, therefore, any proposals would need Schedule Monument

Consent as well as appropriate archaeological assessments in consultation with Historic England and local archaeological services.

13.23 The HIA concluded that there is opportunity to have some form of development immediately to the south of the designated SAM. This should be very carefully sites to ensure that there are no adverse impacts on the SAM or any other archaeological remains. Careful considerations will also be required in terms of the type and depth of foundations used along with all other intrusive ground works.

POLICY 44

SITES IN TANNER STREET, GREEN STREET, ST PETER'S WAY AND FREESCHOOL STREET (LAA0167/ 0818/ 0931/ 1010)

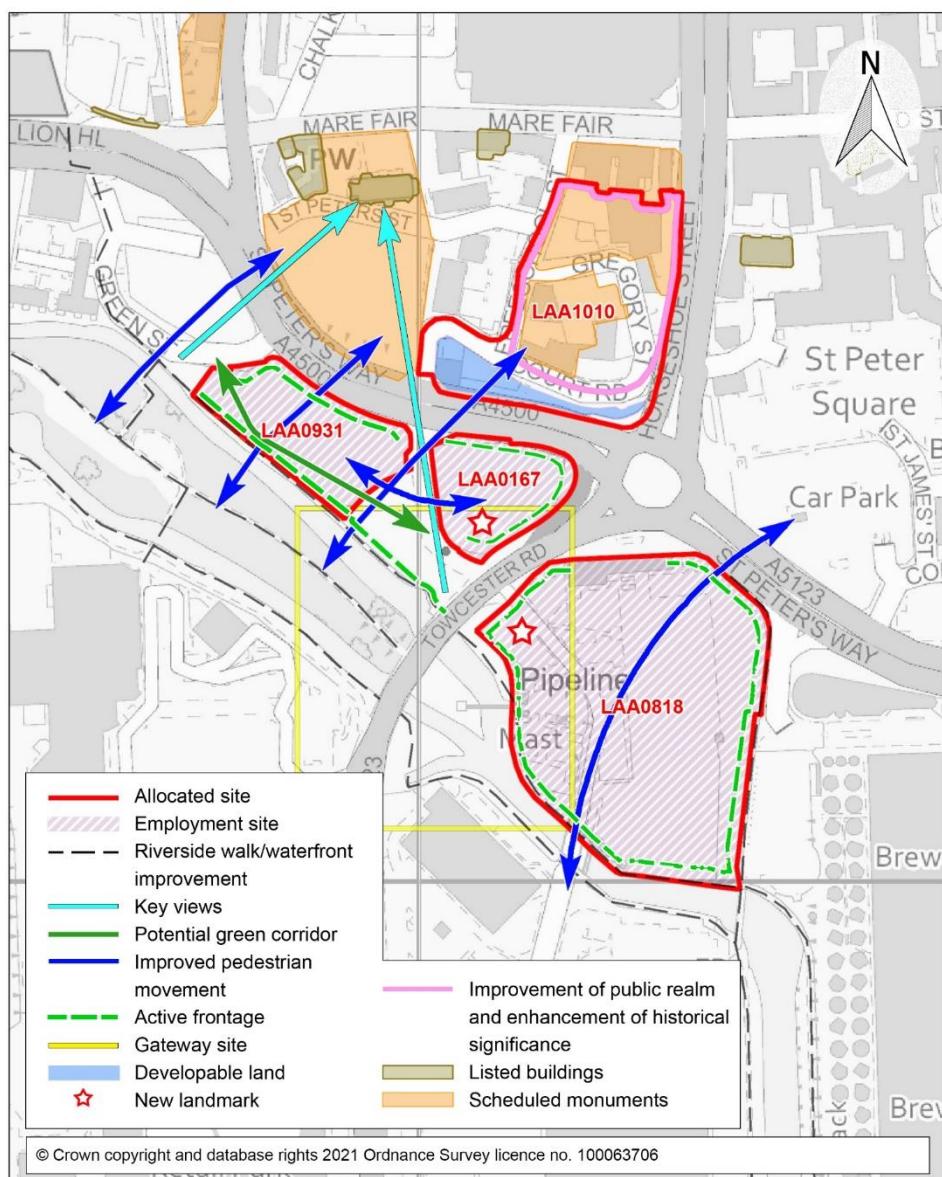
A. Any proposal that comes forward for any of these sites should be designed in an integrated manner, taking into consideration the impacts on each of these sites, the impacts on the heritage assets within the sites and the impacts on the setting of the heritage assets within the vicinity of these sites. Improved connectivity within and between the sites, and to the town centre, will result in an integrated scheme which will also improve the public realm and increase the attractiveness of the town centre as a destination of choice (see Figure 23).

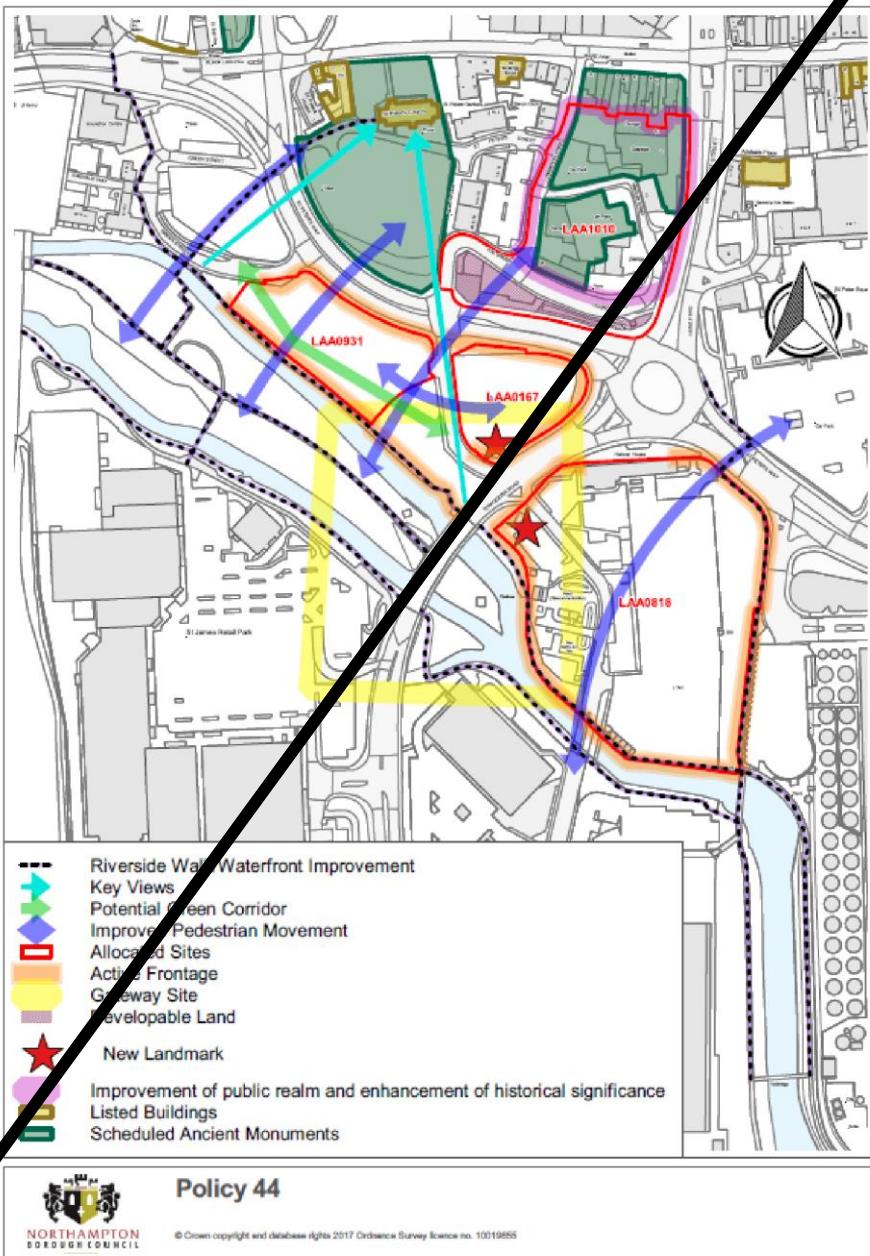
In particular:

- i. Site 0818 St Peter's Way: this site is suitable for commercial development of medium capacity. Any development proposal on this site should seek to improve the connections to the surrounding area to include improved, safe pedestrian links to the town centre. Development proposals will need to have special regard to the locally listed building within the vicinity, including the visibility of the building from the south eastern and south western approach.
- ii. Sites 0167 Tanner Street and 0931 Sites in Green Street: these sites are suitable for low/ medium density commercial development. Any proposals on these sites will need to provide for improved connections to green spaces, the river to the south west and the town centre. The introduction of pedestrian access between these areas is encouraged.
- iii. Site 1010: no new development is permitted on the area designated as a Scheduled Ancient Monument and its immediate surroundings as shown on Figure 23 below. Only the southern part of the site is considered suitable for development, ~~in the region of about~~ 5 dwellings. Any proposal that comes forward for this site should seek to better reveal the historic significance of the site and to reintroduce public realm to this location.

- B. Any proposal forwarded for these sites should be accompanied by a site-specific Flood Risk Assessment.
- C. Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDs).

Figure 23: Development principles for sites in Tanner Street, Green Street, St Peter's Way and Freeschool Street (LAA0167 / 0181 / 0931 / 1010)





Hill Farm Rise, Hunsbury Hill (LAA1100)

13.24 The site is approximately 4.44 hectares in size and is located in Hunsbury, south west Northampton. It is surrounded by a mix of uses including the Mereway Neighbourhood Centre with Tesco Mereway, a library and a Church to the north and north east; residential to the east and west and the railway line and a Local Wildlife Site to the south/ south west.

13.25 The site adjoins a railway line, which then runs in a tunnel (Hunsbury Hill tunnel) under part of the site. The railway forms part of the Northampton Loop Line of

the West Coast Main Line. Also adjoining the site is an area which is used for railway operational purposes including access. In addition, there is a significant number of trees on the site, particularly along the border. There is a possibility that the site also has some priority habitat grassland that may require protecting. The majority of the site is also a potential wildlife site.

13.26 The site is located within Flood Zone 1. The site is also located within 3 miles of the Strategic Road Network and any development on the site could potentially impact on the M1 and the A45.

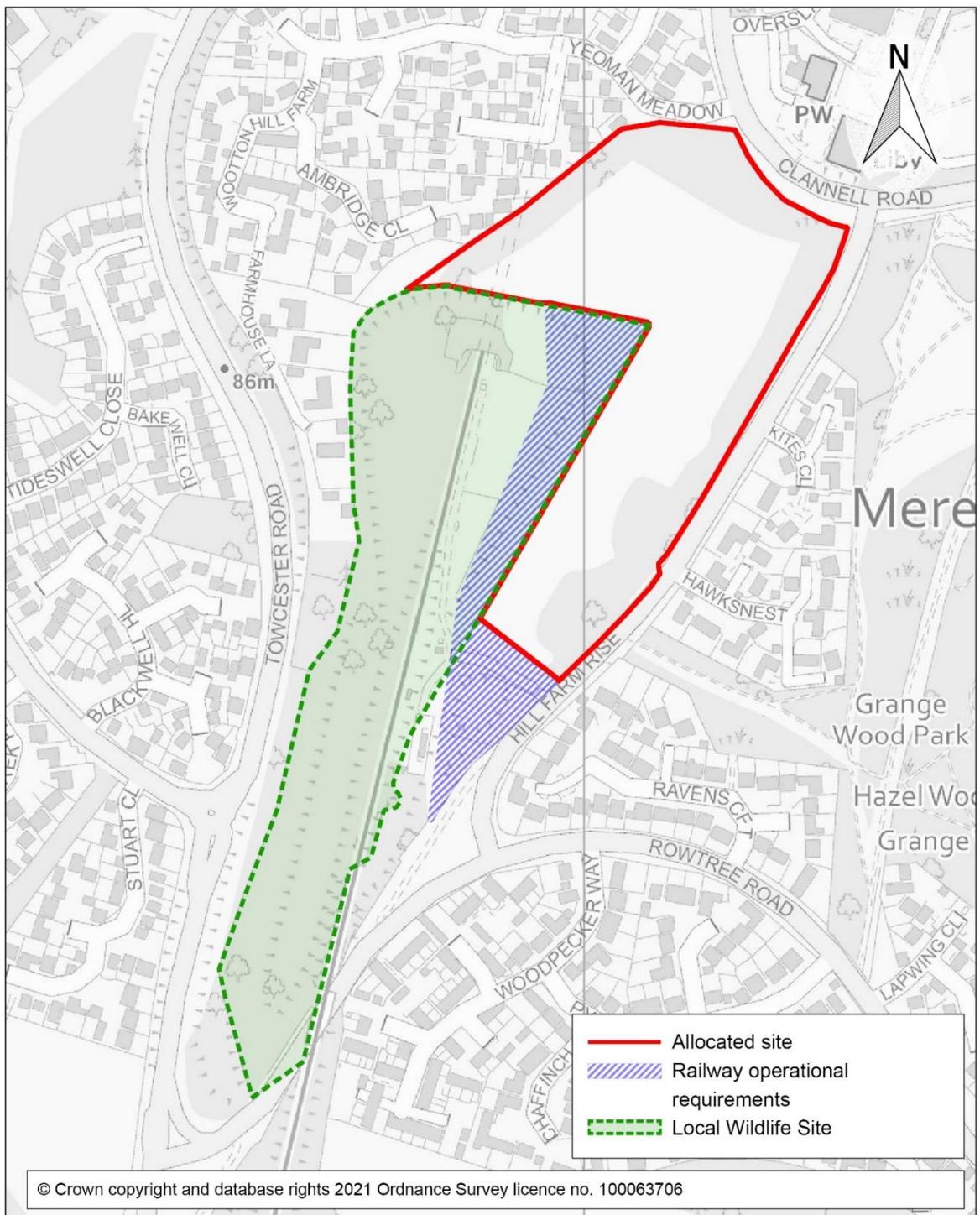
POLICY 45

HILL FARM RISE, HUNSBURY HILL (LAA1100)

Housing development of about 80 dwellings at Hunsbury Hill will be supported subject to the following criteria being met. Proposals will be required to:

- i. demonstrate, through an ecological survey and landscape assessment, the opportunities and constraints offered by the existing natural environment including the high presence of established trees, potential priority habitat grassland and potential wildlife site within the site, and how these are to be protected and/ or how any adverse impacts are to be mitigated against
- ii. ensure that any proposal will be designed in a manner which is sensitive towards the presence of the Local Wildlife Site adjoining the development site including the potential to make the site more resilient to visitor pressure
- iii. ensure that the operational requirements of the rail network, including access, are retained within the area shown hatched on Figure 24
- iv. demonstrate, through the use of design and building materials, that adverse impacts from noise, particularly from the railway operations, will be reduced
- v. improve connectivity and accessibility to the Mereway neighbourhood centre to encourage walking and cycling
- vi. ensure that any proposal for this site is accompanied by a site-specific Flood Risk Assessment
- vii. demonstrate, subject to detailed assessment (including an assessment of contaminated land), that any development on the site maximises the use of Sustainable Drainage Systems (SuDS) to reduce the rate of surface water run off
- viii. prepare a detailed Transport Assessment that includes consideration of the impact of the scheme on the A45 and the M1.

Figure 24: Development principles for Hill Farm Rise (LAA1101)



Abington Mill Farm (LAA1107)

13.27 Abington Mill Farm is located approximately 2 miles (3.2km) east of Northampton's town centre and is 5.02ha in size. It is an area of open land bounded by housing to the north; a sports pitch and informal parking area to the west; and additional open space, the A45 and the River Nene to the south. The site is within 5 to 10 minutes' walk of Billing Road, which is well served by buses and has cycle lanes.

13.28 Close to the site, on the south side of the A45 is the Upper Nene Valley Gravel Pits Special Protection Area and Brackmills employment area. Both are accessible from the site via an overhead bridge across the A45. To the south east of the site, and south of Bedford Road, is the Barnes Meadow Local Nature Reserve.

13.29 The site is located mostly within Flood Zone 2 with pockets of Flood Zones 3a and 3b within the site. Flood defences have been installed around the site. Because it is close to the A45, development on this site may have an impact on the strategic road network.

13.30 The site is also located close to one of the local green infrastructure network, of which there are 9 in total in the Northampton area. Component F is the 'Washlands and Eastern Nene' and comprises the floor of the Nene Valley from the town centre at Midsummer Meadow eastwards to the NRDA boundary. It broadly follows the Nene Valley sub-regional Corridor (Northampton to Wansford (Cambs)). The Green Infrastructure Plan (2016) identifies a list of projects for each component, which can contribute towards enhancing these green infrastructure networks.

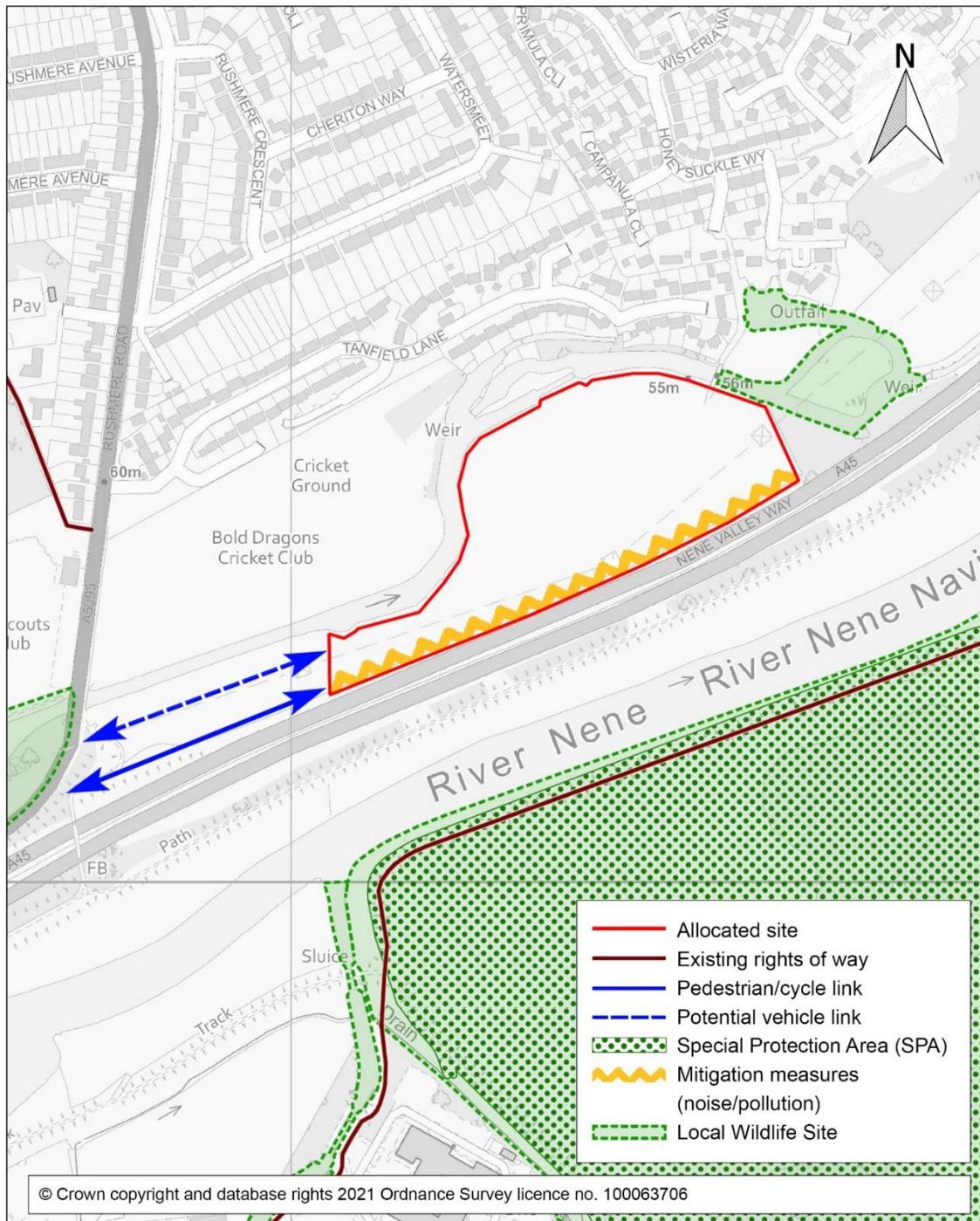
POLICY 46

Abington Mill Farm (LAA1107)

- A. Abington Mill Farm will be developed for about 125 dwellings. The site will be developed in a manner consistent with the diagram shown in Figure 25 below.
- B. Proposals will be required to:
 - i. Include measures to mitigate against the impacts of noise and pollution from the A45 dual carriageway
 - ii. Demonstrate that a safe and secure access from Rushmere Road can be provided in a manner that would pass the exceptions test
 - iii. Include a travel plan, to demonstrate how traffic matters will be mitigated against and managed along Rushmere Road and the Barnes Meadow Interchange
 - iv. Incorporate proposals to encourage cycling and walking, taking advantage of the availability of cycle routes to the south of the A45 which have access to the town centre and areas east of Northampton
 - v. Contribute to improvements to the green infrastructure network to include projects within the Washlands and Eastern Nene Corridor, such as the Upper Nene Valley Gravel Pits and Barnes Meadow Local Nature Reserve
 - vi. Maximise the use of Sustainable Drainage Systems (SuDS) to reduce the rate of surface water runoff
 - vii. Include 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 allowance for climate change to protect against fluvial flooding.

Figure 25: Development principles for Abington Mill Farm (LAA1107)



CHAPTER 14: IMPLEMENTATION AND MONITORING FRAMEWORK

Introduction

14.1 Review and monitoring are important and necessary parts of the plan led system. The Council is required to report on the progress of Local Plan preparation and to what extent Local Plan policies are being achieved as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. As such there is a duty to publish:

- Detail relating to the Local Plan(s) and supplementary planning documents outlined in the Local Development Scheme including: the title; timetable for production; progress towards meeting the identified milestones; details of adoption; and, if necessary, reasons for any delay;
- Identification of Local Plan policies that are not being implemented, the reasons behind this and the steps the authority intends to take to rectify this situation;
- Where a policy in a local plan specifies an annual number, or a number relating to any other period of net dwellings or net additional affordable dwellings, completed during the monitoring period and since the start of the plan period,
- Details of any neighbourhood development order or neighbourhood development plans;
- Summary details of CIL expenditure during the reported year; and
- Details of any action taken under the duty to cooperate during the monitoring period

Monitoring Framework

14.2 In order to determine the effectiveness of the overall plan and to take into account the changing circumstances nationally and locally, a monitoring framework is required to measure how the Northampton Local Plan Part 2 is delivering its objectives. If necessary, actions or interventions can be put in place to mitigate against any potential adverse impacts.

How will the Local Plan Part 2 be monitored?

14.3 The Council has and will continue to monitor the implementation of the Local Development Scheme and the extent to which the policies set out in the Local Plan Part 2 are being achieved.

14.4 Using data from internal and external sources the council will produce an Annual Monitoring Report (AMR) which will contain an assessment of the extent to which the policies set out in the Plan are being achieved and whether targets are being met. The Local Plan Part 2 AMR should be read in conjunction with the West

Northamptonshire Joint Core Strategy (Local Plan Part 1) AMR (or its successor Plan).

Implementation

14.5 The policies in the Local Plan will be implemented to facilitate delivery of the spatial vision and strategic objectives. However, it is important to recognise that many other processes will influence their achievement, such as the implementation of other plans and strategies produced at the national and local levels, investment by the public, private and voluntary sectors and the actions of individual businesses and persons. The pPlan is the key element in delivering the spatial vision and strategic objectives for Northampton the borough, but it is not able to do this in isolation.

14.6 As a consequence, in order to deliver the proposed growth in Northampton the borough in a sustainable manner, it will be necessary to form effective and ongoing working relationships with key delivery partners in both the public and private sectors, establish robust delivery mechanisms and capitalise on funding opportunities.

14.7 The Local Plan will have an important role in influencing and providing a positive framework for investment decisions. Ultimately, it will be investments by individual developers, businesses, and other organisations that will deliver the spatial vision and implement many of the policies within the Local Plan.

The Monitoring Indicators

14.8 Indicators are essential instruments for monitoring and evaluation. Indicators measure how far policies have gone towards meeting objectives, targets and delivering sustainable development, and provide the evidence required to know if policies have unintended consequences.

14.9 The Monitoring Framework for the Local Plan Part 2 will use both quantitative and qualitative indicators to assess policy implementation. Quantitative, or statistical in nature, data will be used where policies promote or aim to manage additional development. For other policies contextual updates will be used to measure the impact of the policy.

14.10 Most of the indicators contained in the Monitoring Framework are easily accessible from sources of national statistics, regional or sub regional data sources, or from information held or collected within the Council and its partner organisations.

14.11 The indicators outlined in the Local Plan implementation and monitoring framework are set out below and are reflective of the table used within the West Northamptonshire Joint Core Strategy Monitoring Framework (Appendix 6) and should be read in conjunction with it. They offer an effective strategy for monitoring the implementation of the Local Plan's spatial strategy, objectives, policies and proposals. To be robust over the plan period and resilient to change, it will be necessary to periodically review these to respond to changes in the availability of information, and the effectiveness of specific indicators.

14.12 The Monitoring Framework is organised by objective, with each objective identifying the primary and secondary policies for its delivery. It also cross references to the relevant West Northamptonshire Joint Core Strategy policy and sustainability appraisal objective, which are listed at the end of the tables.

14.13 It is only the primary policy delivering the objective that will be monitored, and it is anticipated that only policies that require numerical monitoring will be recorded. In some cases, the Core Strategy policy will be the most appropriate policy to monitor and as identified in the West Northamptonshire Joint Core Strategy, the mechanisms for monitoring are already in place.

14.14 Where policies are required to meet standards e.g. flood risk or open space, it may be appropriate for only elements of a policy to be monitored.

Table 12: Implementation and Monitoring Framework

Objective 1 – High quality design and place shaping							
Objective: To achieve high quality design that takes account of and improves local character and heritage and provides a safe, healthy and attractive place for residents, visitors and businesses.							
Policy numbers	Local Plan Part 2:		2, 3, 4, 6, 27, 28, 31, 39, 40, 41, 42, 43, 44				
	West Northamptonshire Joint Core Strategy:		C5, RC1, BN1, BN5, N3, N4, N5, N6, N7, N8, N9, N9A, N11				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
<u>Building for life – 100% of new residential development to achieve Built for Life Certification</u> <u>Major new residential</u>	Applies to all residential development <u>of ten dwellings or more</u>	2	3, 4	SA4, SA5, SA11	LPA (DM) / NCC / Developers	Where relevant permissions granted contrary to 'Built for Life' Panel that are not capable of achieving a	Consider barriers to implementation. Further discussions with developers.

<u>development capable of achieving a Building for a Healthy Life commendation</u>					<u>Building for a Healthy Life commendation.</u>	
Space standards — 100% of residential should provide at least the minimum space standards as set out in Nationally Described Space Standards	Applies to all residential development	3	6	SA1, SA2, SA8	LPA (DM) / NCC / Developers ≥10% of development fails to achieve standard	Consider barriers to implementation. Speak with developers to understand viability issues Review policy

Maintenance	All major developments commit to long term maintenance plans / contributions to ensure that places remain attractive and retain character and heritage	2	4	SA1, SA6, SA7, SA13	LPA (DM) / NCC-/ Developers	>10% of major developments fail to implement long maintenance plans	Consider barriers to implementation. Speak with developers to understand viability issues Review policy
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Objective 2 – Housing							
Objective: To provide a range of housing in sustainable locations, seeking to ensure all residents have access to a home they can afford (with a suitable standard of residential amenity), and that meets their needs.							
Policy numbers	Local Plan Part 2:		2, 4, 13, 14, 15, 16, 21				
	West Northamptonshire Joint Core Strategy:		H1, H2, H3, H4, H6, N3, N4, N5, N6, N7, N8, N9, N9A, N11, RC1, RC2				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
Progress towards achieving a mix of dwelling types and tenures as identified in Policy 14.	All developments meet the thresholds in Policy 14	14	4, 2	SA2, SA4	LPA (DM) / Developers	Annual monitoring of permissions indicates that dwelling types, tenures and mixes are not in accordance with Policy 14	Discuss with developers to understand viability issues. Consider evidence and update policy.

Progress towards housing delivery as set out in Policies 13, 41, 42, 43, 44	Delivery of housing in accordance with the housing trajectory	13, 41, 42, 43, 44		SA1	Developers – liaise on individual site trajectories. Monitoring data from DM and West Northamptonshire Joint Planning Unit	Annual monitoring of planning permissions and trajectories show +/- 25% of predicted rate of delivery over a 3 year rolling period	Review trajectories if necessary. Identify barriers To delivery: viability, infrastructure provision.
Mixed-use buildings	All major applications in local centres should include at least one mixed-use building.	14	4, 21	SA2, SA4, SA8	LPA (DM) / Developers		
Concentration of HiMOs	No more than 1015% of dwellings within a 50m radius of the application sites are HiMOs	15		SA2	LPA (DM) / Developers	Data from DM identifies concentrations of HiMOs Appeals	Identify reasons for approving HiMOs and alter policy.

Net additional pitches for gypsies, travellers and travelling showpeople	Planning approval for new pitches as identified in latest evidence as set out in Policy 16.	16		SA2	LPA (DM) / Developers / RSL	Additional pitches are not achieved by 2029	Identify no. of applications, refusals (if any) and reasons for refusal. Reassess policy.
<p>Note: The following is monitored via the West Northamptonshire Monitoring Framework (Pg.287 – 290)</p> <ul style="list-style-type: none"> • Plan period housing targets (5 year land supply) • Delivery of Sustainable Urban Extensions • Net additional dwellings per annum • New and converted dwellings on previously developed land • Net additional pitches – Gypsy and Traveller <p>Gross AH completions</p>							

Objective 3 – Supporting the Town Centre							
Objective: To drive the regeneration of Northampton's town centre and improve visitor and investor experience by making it the focus of social networking, where people have access to commerce, leisure and culture, heritage, wide ranging employment opportunities and retail options at the heart of Northamptonshire in an attractive environment. To improve accessibility into the town centre to increase its attractiveness as a destination of choice.							
Policy numbers	Local Plan Part 2:		8, 9, 11, 12, 19, 21, 38,				
	West Northamptonshire Joint Core Strategy:		S9, E7, N1, N10				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
Proposals and schemes contribute to range of retail, leisure and service-based offers in Northampton Town Centre and the Central Area	Delivery of schemes on identified sites within the town centre and central area in line with policy 8.	8	9, 11, 12	SA7	LPA (DM and Regeneration) / Developers	No development within 5 years of adoption of LPP2.	Consider barriers to delivery such as viability, corporate mechanisms.

Vacancy rates	Number of planning approvals granted to vacant units for retail or for change of use in the town centre	19	9, 12,	SA7, SA10, SA11	LPA (DM and Regeneration) / Developers. Surveys of shop occupancy levels	>20% of shops in primary shopping area are vacant	Consider new evidence and review of policy 19
Town centre footfall	Healthy footfall in Northampton Town Centre	8		SA3, SA7, SA11	LPA / Northampton Town Centre Manager	Declining annual footfall	Identify reasons why; further retail studies.
Residential uses in town centre	5% of Northampton's new housing created in town centre	2	8	SA2, SA3, SA4, SA7, SA11	Developers / LPA (DM)	Annual monitoring of planning permissions within the town centre (including change of uses)	Identify barriers to delivery such as viability.
Retail development	To provide retail floorspace as set out in Policy 19	19	9	SA3, SA7, SA11, SA13	Developers/ LPA (DM) / Northampton Town Centre Manager	Lack of planning permissions granted for retail within the town centre.	Identify barriers to development such as viability.

Objective 4 – Economic Advantage							
Objective: To strengthen and diversify Northampton's economy by taking advantage of our internationally well-placed location, strategic transport network and proximity to London and Birmingham. To capitalise on the opportunities offered by the Oxford to Cambridge Arc.							
Policy numbers	Local Plan Part 2:		16, 17				
	West Northamptonshire Joint Core Strategy:		S7, S8, E1, E2, E3, E6				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
Protect safeguarded sites identified in Policy 17 and support new employment schemes outside safeguarded areas	No net loss of safeguarded employment sites unless there is marketing evidence to justify the loss, and delivery of new employment sites in accordance with identified demand that is sustainably located	17	18	SA6	LPA / developers / business owners	Planning approvals on sites that are safeguarded for employment purposes without justification. Loss of safeguarded employment land without justification.	Consider barriers to implementation. Review evidence and consider policy review.

					No new net employment floorspace within 5 years of LPP2 adoption	
<u>Support the delivery of new employment sites outside the safeguarded areas as promoted in Policy 17a and Policy 18</u>	<u>New employment to be delivered on the sites identified for allocation and on suitable windfall sites.</u>	<u>17A, 18</u>	<u>SA6</u>	<u>LPA / developers / business owners</u>	<u>No new employment floorspace approved annually.</u>	<u>Consider barriers to implementation. Review evidence and consider review.</u>
Note: The following is monitored via the West Northamptonshire Joint Core Strategy Monitoring Framework (Pg 279 – 281)						
<ul style="list-style-type: none"> • 5 year employment pipeline • Net job growth 						

Objective 5 – Specialist business development							
Objective: To support and develop opportunities for specialist employment clusters and business development focused on a low carbon economy. To maximise the opportunities offered by a regenerated town centre and the Enterprise Zone.							
Policy numbers	Local Plan Part 2:		17, 18				
	West Northamptonshire Joint Core Strategy:		S7, E3				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
Safeguard existing employment sites, including Waterside Enterprise Zone	Creation of new jobs within office, general industrial, warehousing and distribution.	17	18	SA6	Developers / LPA / SEMLEP	Use of SEMLEP figures. Loss of safeguarded employment land and identified lack of proposals on key employment	Identify barriers to employment development in key locations. Review evidence and possibly policy.
						Sites	

Development allocations	These are delivered over the plan period	38	39, 40, 41, 42, 43, 44	SA1, SA4, SA5, SA13	Developers / LPA	Use of SEMLEP figures. Loss of safeguarded employment land and identified lack of proposals on key employment sites	Identify barriers to employment allocations. Review evidence and possibly policy.
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Objective 6 – Heritage							
Objective: To conserve, and where possible, enhance through carefully managed change, the heritage assets and their settings, and to recognise and elevate their role in providing a sense of place and local distinctiveness.							
Policy numbers	Local Plan Part 2:		9, 31, 39, 41, 42, 43, 44				
	West Northamptonshire Joint Core Strategy:		BN5, N1				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
Development only allowed in accordance with Policy 31	Protect and enhance the historic environment	31	9, 39, 41, 42, 43, 44	SA11	Developers / LPA / Historic England	Appeal decisions that override Policy 31 New historic environment policy / guidance released	Consider barriers to adhering to Policy 31 Consider review of evidence base

Objective 7 – Protecting and building communities

Objective: To ensure new development in urban areas actively supports and links new and existing communities physically and socially, to achieve social cohesion, maintain or improve the existing residential amenity and address the areas of deprivation identified in parts of the Borough.

Policy numbers	Local Plan Part 2:		2, 3, 4, 6, 7, 8, 9, 11, 13, 22, 23, 24, 25, 28, 32, 37				
	West Northamptonshire Joint Core Strategy:		C2, C5, RC1, RC2, INF1				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
Number of planning permissions for major residential applications that include Major residential developments securing community facilities, sports facilities,	Meet <u>All major residential developments</u> <u>meet criteria and standards</u> set out in policies 23, 24 and 28	24	22, 23, 25, 28	SA3, SA4, SA5	Developers / LPA	>20% of permissions failing to meet standards <u>Permissions granted contrary to policy</u>	Identify barriers to implementation with developers. Consider evidence and potentially review policy. <u>Consider barriers to implementation.</u> Further

playing pitches and public open space							<u>discussions with developers.</u>
Open space maintenance contributions	Long-term funding for all new open spaces created	28	24	SA6, SA7, SA8	Developers; LPA	Unfunded open space	Re-negotiate with developers for increased contribution
Creation of community facilities	Major development should provide facilities to meet the needs of that development	24	22, 23	SA8, SA9, SA11, SA13	Developers / LPA / NCC	Lack of facilities being delivered through major schemes	Identify barriers to implementation with developers. Consider evidence and potentially review policy.

Note: The following is monitored via the West Northamptonshire Joint Core Strategy Monitoring Framework (Pg 272 -273):

- Number of planning permissions granted contrary to Northamptonshire Police Crime Prevention Design Advisors service and
- % planning permissions for new residential and commercial development making adequate provision for community facilities and public open space.

Objective 8 – Public Health							
Objective: To promote healthier and safer communities by supporting the creation of and protecting shared facilities, improving connectivity and securing high quality design, and to maintain or improve the existing residential amenity.							
Policy numbers	Local Plan Part 2:		4, 6, 20, 23, 24				
	West Northamptonshire Joint Core Strategy:		S10, C1, C2, RC1, RC2, H4, N3, N4, N5, N6, N7, N8, N9, N9A, N11				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
Contextual indicator – health and quality of life indicators	Improved data on health via JSNA	6	4, 20	SA4, SA5	NNC / LPA / developers	Worsening health statistics via JSNA	Consider evidence and barriers to built development that can help improve health. Consider revision of policies.
Maintain high environmental health	Objections from Environmental	6	5	SA8, SA12, SA13	Developers / LPA	Design that creates immediate	Consider barriers implementing

standards for new development	Health team					Environmental Health concerns	designs that are satisfactory from an Environmental Health perspective.
Obesity levels	Lower level by <u>5% per year on year</u>	6	20	SA8	PHE / <u>WNC NCC</u>	Obesity levels increasing	Review strategy to do this
Concentration of hot-food takeaways	No more than two adjacent A5 units within 400 metres of each other	20	6	SA8	LPA, Planning Policy	Appeals	Consider evidence and potentially review policy.

Objective 9 – Educational attainment							
Objective: To raise educational achievement and the skills base of our communities through supporting the development of our learning infrastructure and strengthening links between local businesses and local schools, Moulton and Northampton Colleges and the University of Northampton.							
Policy numbers	Local Plan Part 2:		10, 37				
	West Northamptonshire Joint Core Strategy:		E6				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
Supporting and safeguarding University of Northampton Waterside Campus	<u>Planning permissions granted for development that leads to Enhancements to already implemented scheme</u>	10		SA6	University of Northampton / LPA	No <u>permissions granted for delivery of enhancements</u> within 5 years of adoption of plan	Identify barriers to delivery with developer such as viability issues.

Delivery of new schools / school places in suitable locations	To ensure new residential development is accompanied by educational infrastructure	37		SA3	Developers, NCC, LPA, private / academy school suppliers	Lack of school places	Identify barriers such as land / suitable locations and viability issues with developers and NCC
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Objective 10 – Green Infrastructure							
Objective: To conserve natural habitats and species, provide net gains in biodiversity and enhance Northampton's Natural Capital and green infrastructure network by improving existing areas as well as incorporating and designing green infrastructure these into large scale major development.							
Policy numbers	Local Plan Part 2:		5, 27, 28, 29, 30				
	West Northamptonshire Joint Core Strategy:		BN1, BN2, BN4, BN8				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
Sustaining and enhancing existing green and blue infrastructure and supporting the creation of new green and blue infrastructure	Housing developments of 15 or more dwellings Major developments to deliver or contribute to projects identified in Northampton Green Infrastructure	27	28 and 29A and 29B	SA9	Developers / LPA / NCC	No new green or blue Infrastructure projects delivered within 5 years of adoption of LPP2	Consider barriers to implementation. Consider DM practices. Consider review of policy

	Plan						
<u>Development on different types of open space</u> <u>All new major developments to meet standards set out in Policy 28</u>	<u>Development on land identified as surplus in the Open space, sport and recreation study</u> <u>Maintaining the qualitative and quantitative standard of open space.</u>	<u>27-28</u>	<u>28, 29A and 29B</u>	SA10	LPA / planning policy	<u>Development on land that has been identified as having a deficit of open space.</u> <u>Approval granted where qualitative and quantitative standards are not met.</u>	Consider why this is happening with DM. Review evidence.
Biodiversity net gain	<u>Major All developments must offset and secure a net gain in biodiversity</u>	<u>29A</u>	<u>27, 29B</u>	SA9	Developers / LPA	<u>Loss of biodiversity</u> <u>Any approval for development that does not result in a net gain in biodiversity.</u>	Identify with developers and DM why net increase in biodiversity is not achievable and consider viability.

Objective 11 – Connections							
Objective: To reduce the need to travel, shorten travel distances and make sustainable travel a priority and an attractive option across Northampton by maximising and promoting the use of alternative travel modes. In so doing, the Plan will promote the principle objectives of the Northampton Low Emissions Strategy, combat congestion, reduce carbon emissions and address social exclusion for those who do not have access to a private car. In addition, to ensure a much wider range of destinations will be accessible by direct railway services from Northampton, including some fast, long distance services.							
Policy numbers	Local Plan Part 2:		2, 5, 32, 34				
	West Northamptonshire Joint Core Strategy:		C1, C2, C4, C5				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
Progress towards delivering sustainable schemes identified in Policy 34, and aligned to Policy 32 Development meeting	Delivery of sustainable transport measures and schemes in accordance with Policies 32 and 34 schemes identified in	32, 34	2, 5	SA2, SA3, SA4	Developers / LPA / NCC	No progress towards delivery of new schemes within 5 years of adoption of LPP2 Approval granted for development that is not in accordance with	Consider barriers to implementation. Consider review of CIL

<u>criteria set out in Policies 32 and 34</u>	<u>Policy 34 and aligned to Policy 32</u>					<u>Policy 32 and / or Policy 34.</u>	
Progress towards NCC's modal shift objectives as set out in Policy 32	5% reduction in share of private car trips across existing developments, and 20% reduction from all new development	32	6	SA2, SA4, SA8	Developers / LPA	- Less than 5% and 20% reductions in modal shift being achieved Travel to work surveys to understand why modal shift is not happening. Review Travel Plans and why they are not being implemented. Understand barriers such as suitable infrastructure / services to allow for modal shift.	

Objective 12 – Climate change

Objective:

To achieve the vision of Northampton as an environmentally sustainable borough, where people will, over time, be able to make a transition to a low carbon lifestyle, demand for resources will be minimised and the impacts of climate change will be mitigated and adapted to by:

- Securing radical reductions in carbon emissions
- Promoting sustainable design and construction in all new development
- Ensuring strategic development allocations are located and designed so as to be resilient to future climate change and risk of flooding
- Encouraging renewable energy production in appropriate locations and
- Ensuring new development promotes the use of sustainable travel modes

Policy numbers	Local Plan Part 2:		3, 4, 5, 7, 29, 32, 34, 35				
	West Northamptonshire Joint Core Strategy:		S11, C1, C2, C5, H4, BN7A, BN7, BN9				
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies
Compliance with measures set out in Policy 5 <u>Development complies with Policy 5</u>	All units in major development will be required to demonstrate how they are increasing	5	3-2	SA8, SA12, SA13, SA16	Developers / LPA (development management)	Low adoption of measures identified through granted major planning applications	Identify barriers to delivery with developers and DM. Consider whether viability is an issue.

	<p><u>efficiency in line with policy 5</u> <u>All applications for major development should include a sustainability statement demonstrating how they meet the criteria, unless there is reasoned justification and appropriate mitigation.</u></p>				<p><u>Planning permission granted where compliance has not been demonstrated.</u></p>	
<u>Development manages flood risk is accordance with Policy 7 (Flood risk and water management)</u>	No applications granted contrary to flood management documents referenced in Policy 7 <u>and associated criteria, unless there is reasoned justification and</u>	7		SA14	Developers / LPA / EA DM / planning policy	Permissions granted contrary to advice, <u>without reasoned justification and appropriate mitigation.</u> Discussions with partner organisations, developers and DM. <u>Identify with developers what are the barriers to implementation.</u>

	<u>appropriate mitigation.</u>					
<u>Development ensures access to water supply and drainage infrastructure, includes SUDs and provides surface water attenuation to the design standard for the Upper Nene Catchment</u>	<u>All new development ensures access to water supply and drainage infrastructure, includes SUDs and provides surface water attenuation to the design standard for the Upper Nene Catchment, unless there is reasoned justification and appropriate mitigation</u>	7		SA14	<u>Developers / LPA / EA</u>	<u>Permissions granted contrary to policy, without reasoned justification and appropriate mitigation</u> <u>Identify with developers what are the barriers to implementation</u>

<p>Increase in number of electric vehicle charging points</p> <p><u>All new dwellings in major residential development should include EVCPs in accordance with Policy 32.</u></p>	<p>All new dwellings in residential major development should have EVCPs</p> <p><u>Increase in number of electric vehicle charging points.</u></p>	<p>35-32</p>	<p>5</p>	<p>SA8, SA12</p>	<p>Developers / LPA / NCC</p>	<p>No annual increase in EVCP installations</p> <p><u>Permissions granted contrary to policy.</u></p>	<p>Discuss barriers to delivery such as viability, utility network capacity</p> <p><u>Identify with developers what are the barriers to implementation.</u></p>	
Parking standards	To meet Northampton car motor vehicle and cycle parking and standards	35	4	SA12	Developers / NCC / LPA	Planning consents applications which are not in accordance with motor vehicle exceed car parking standards and fail to provide suitable and safe cycle parking.	Discussions with DM and developers to reduce occurrences.	<p><u>Identify with developers what are the barriers to implementation.</u></p>

Objective 13 – Infrastructure and development								
Objective: To protect and enhance local services and to ensure social, physical, green and technology infrastructure is adequately provided to meet the needs of people and business in a timely and sustainable manner in response to regeneration and new development. To ensure that the relevant utilities are provided prior to occupancy.								
Policy numbers	Local Plan Part 2:		6, 7, 23, 24, 25, 26, 27, 28, 32, 33, 34, 36, 37					
	West Northamptonshire Joint Core Strategy:		C1, C2, C5, BN1, BN7A, INF1, INF2					
Indicator (and type)	Target	Main policy delivered	Additional policies delivered	SA Objective delivered?	Main agencies (for delivery) / Source (for monitoring data)	Trigger	Contingencies	
Provision of or contribution to infrastructure as set out in Policy 37	Major development should contribute towards infrastructure schemes in order to mitigate their development	37	6, 7, 23, 24, 25, 26, 27, 28, 30, 32, 33, 34, 36	SA2, SA3, SA8, SA12, SA13, SA16	Developers / LPA / NCC / S106 monitoring / CIL / <u>Government grants</u>	Non delivery of key transport schemes, green infrastructure, school places and other infrastructure required to mitigate development.	Identify with developers and partners blocks to infrastructure delivery. Consider if viability is an issue.	

Sustainability Appraisal (SA) Objectives

1. Help make suitable housing available and affordable according to the needs of Northampton's population.
2. Reduce the need to travel within, to and from Northampton by providing easy access to jobs, services and facilities and to sustainable travel alternatives to the car.
3. Provide easy access to primary and secondary schools by sustainable modes.
4. Improve the health and well-being of Northampton's residents, promoting healthy lifestyles and reduce health inequalities.
5. Reduce crime and the fear of crime in Northampton.
6. Facilitate the growth of Northampton's economy and the availability of jobs.
7. Maintain and strengthen the character and vitality of Northampton town centre.
8. Minimise Northampton's greenhouse gas emissions.
9. Protect and enhance Northampton's biodiversity and geodiversity.
10. Protect and enhance the quality and character of Northampton's landscape and townscape.
11. Conserve and enhance Northampton's historic environment, heritage assets and their settings.
12. Minimise air pollution in and around Northampton, particularly in the AQMAs.
13. Encourage sustainable water management.
14. Reduce the risk of flooding to people and property in Northampton.
15. Encourage the efficient use of land in Northampton and protect its soils and mineral resources.
16. Facilitate sustainable waste management.

GLOSSARY

Disclaimer

The Glossary is neither a statement of law nor an interpretation of the law, and its status is only an introductory guide to planning terminology and should not be used as a source for statutory definitions.

Affordable Housing

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/ or is for essential social workers); and which complies with one or more of the following definitions:

Affordable housing for rent: meets all of the following conditions (a) the rent is set in accordance with the Government's rent policy, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Built to Rent scheme (in which case the landlord need not be a registered provider) and (c) it includes provision to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

Starter Homes: is as specified in Sections 2 and 4 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision making. Where secondary legislation has the effect of limiting a householder's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

Discounted market sales housing: is sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative

affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Aged or veteran tree

A tree which, because of its great age, size or condition is of exceptional value for wildlife, in the landscape, or culturally.

Air Quality Management Areas

Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

Ancient Woodland

An area that has been wooded continuously since at least 1600 AD.

Appropriate Assessment

Under the habitat Regulations Assessment, stakeholders such as developers/ local authorities are required to undertake this assessment when a plan or project is likely to have an impact on any European Environmental conservation designations (for example, Special Protection Areas)

Archaeological interest

There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

Article 4 Direction

A direction which withdraws automatic planning permission granted by the General Permitted Development Order.

Best and most versatile agricultural land

Land in grades 1, 2 and 3a of the Agricultural Land Classification.

Biodiversity

The variety of plants, animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity.

Birds and Habitats Directives

European Directives to conserve natural habitats and wild fauna and flora.

Blue infrastructure

Blue infrastructure refers to urban infrastructure relating to water.

Brownfield land

See previously developed land.

Brownfield land registers

Registers of previously developed land that local planning authorities consider to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulation 2017. Local planning authorities will be able to trigger a grant of permission in principle for residential development on suitable sites in their registers where they follow the required procedures.

Climate change adaptation

Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunities.

Climate change mitigation

Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Coastal Change Management Area

An area identified in Local Plans as likely to be affected by coastal change (physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion).

Community Forest

An area identified through the England Community Forest Programme to revitalise countryside and green space in and around major conurbations.

Community Infrastructure Levy

A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area. The funding goes towards provision of infrastructure to help mitigate the development.

Community Right to Build Order

An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site-specific development proposal or classes of development.

Competent person (to prepare site investigation information)

A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation.

Conservation (for heritage policy)

The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Decentralised energy

Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.

Designated Heritage Asset

A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Design code

A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

Deliverable

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:

- a. sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- a. where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.

Developable

To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

Developer Contributions

Contributions made by a developer to remedy the impact of development, either by paying money for work to be carried out or by directly providing facilities or works either on or off site.

Development Plan

This includes adopted Local Plans, Neighbourhood Plans and the London Plan, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.

District Centre

A centre that provides a broad range of retail uses and a number of facilities to service the community, such as a group of shops including a supermarket or superstore and a range of non-retail services such as banks, building societies and restaurants as well as local public services such as a library and healthcare provision.

Ecological networks

These link sites of biodiversity importance.

Economic development

Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).

Ecosystem services

The benefits people obtain from ecosystems such as, food, water, flood and disease control and recreation.

Edge of centre

For retail purposes, a location that is well connected and up to 300 meters of the primary shopping area. For all other main town centre uses, a location within 300 meters of a town center boundary. For office development, this includes locations outside the town center but within 500 meters of a public transport interchange. In determining whether a site falls within the definition of edge of center, account should be taken of local circumstances.

Environment Agency

A public body responsible for protecting and improving the environment of England, protecting communities from the risk of flooding and managing water resources.

Environmental Impact Assessment

A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

European site

This includes candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in regulation 8 of the Conservation of Habitats and Species Regulations 2010.

Functionally Linked Land

Any land outside of the European designated site which is used by species that are qualifying interest features of that designated site

Geodiversity

The range of rocks, minerals, fossils, soils and landforms.

Green Infrastructure

A strategically planned and delivered network of high quality green spaces and other environmental features. It is designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits for local communities. Green infrastructure includes parks, open spaces, playing fields, woodlands, allotments and private gardens.

Habitats Regulations Assessment

Under the Habitat Regulations 2010, where a plan or project (alone or in combination with other projects or plans) is likely to affect a European site or European Marine Site, a HRA is used to consider the impact on the integrity of the site and to identify measures that would avoid or reduce the impacts to an acceptable level.

Heritage Asset

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

Heritage Coast

Areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors.

Heritage Impact Assessment

A Heritage Impact Assessment (HIA) is a document that outlines the historic or archaeological significance of a building or landscape within its wider setting. It includes an outline of any proposed works, an assessment of their impact on the building or landscape and a mitigation strategy.

Historic environment

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Historic Environment Record (HER)

Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

Housing Delivery Test

Measures net additional dwellings provided in a local authority area against homes requires, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November.

Inclusive design

Designing the built environment, including buildings and their surrounding spaces, to ensure that they can be accessed and used by everyone.

Infrastructure Delivery Plan

This identified the necessary social, physical and green infrastructure required to support the new development proposed in the Joint Core Strategy for West Northamptonshire up to 2029. The document will be subject to monitoring and regular review.

Instrumentation operated in the national interest

Includes meteorological and climate monitoring installations, satellite and radio communication, defence and national security sites and magnetic calibration facilities operated by or on behalf of the Government, delegated authorities or for defence purposes.

Local Centre

A centre which includes a range of small shops and services of a local convenience nature, serving a small catchment. They might typically include a small supermarket, a newsagent, a sub post office, a pharmacy and a take-away.

Local Development Order

An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

Local Development Scheme

This sets out a programme for preparing local development documents.

Local Enterprise Partnership

A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

Local Lead Flooding Authority

Local Lead Flood Authorities are Unitary or County Councils and are responsible for coordinating flood risk management in their area. They are responsible for managing the risk of flooding from surface water, groundwater and ordinary watercourses and lead on community recovery.

Northamptonshire County Council is the lead local flood authority (LLFA). Their responsibility is for the co-ordination and management of local flood risk involving flooding from surface water, ordinary watercourses and groundwater.

Local Nature Partnership

A body, designated by the Secretary of State for Environment, Food and Rural Affairs, established for the purpose of protecting and improving the natural environment in an area and the benefits derived from it.

Local Nature Reserve

Sites of local biodiversity importance that are also important for local communities.

Local Plan

The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.

Local Planning Authority

The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority apply to the district council, London borough council, county council, Broads Authority, National Park Authority and the Greater London Authority, to the extent appropriate to their responsibilities.

Local Wildlife Site

Non-statutory designation comprising sites of substantial local importance for wildlife conservation which are identified by a partnership between the Wildlife Trust, local authorities, statutory nature conservation agencies, local naturalists, landowners and wildlife charities using national criteria which have been adapted for local use. Most are privately owned.

Main Town Centre Uses

Retail development (including warehouse clubs and factory outlet centers); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centers, indoor bowling centers, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Major Development

For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional

floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Major Hazards

Major hazard installations and pipelines, licensed explosive sites and nuclear installations, around which Health and Safety Executive (and Office for Nuclear Regulation) consultation distances to mitigate the consequences to public safety of major accidents may apply.

Minerals of local and national importance

Minerals which are necessary to meet society's needs, including aggregates, brickclay (especially Etruria Marl and fireclay), silica sand (including high grade silica sands), cement raw materials, gypsum, salt, fluorspar, shallow and deep-mined coal, oil and gas (including hydrocarbons), tungsten, kaolin, ball clay, potash and local minerals of importance to heritage assets and local distinctiveness.

Mineral Safeguarding Area

An area designated by Minerals Planning Authorities which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.

National Planning Policy Framework

This document sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

National Trails

Long distance routes for walking, cycling and horse riding.

Nature Improvement Areas

Inter-connected networks of wildlife habitats intended to re-establish thriving wildlife populations and help species respond to the challenges of climate change.

Neighbourhood Development Order

An Order made by a local planning authority (under the Town and Country Planning Act 1990) through which Parish Councils and neighbourhood forums can grant planning permission for a specific development proposal or classes of development.

Neighbourhood Plans

A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Non-statutory nature conservation site

An area of land designated for its nature conservation value but which does not receive statutory protection. Some non-statutory sites may however receive a degree of protection under national or local policy. In Northamptonshire these sites include Local Wildlife Sites (LWS), Local Geological Sites (LGS), Potential Wildlife Sites (PWS) and Protected Wildflower Verges (PWV).

Older people

People over retirement age, including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.

Omni-channel

Brands that sell across all channels, including branded websites, market places like Amazon and e-Bay, and social commerce like Facebook and Instagram.

Open space

All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Original building

A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

Out of centre

A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Out of town

A location out of centre that is outside the existing urban area.

People with disabilities

People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

Permission in Principle

A form of planning consent which establishes that a site is suitable for a specified amount of housing-led development in principle. Following a grant of permission in principle, the site must receive a grant of technical details consent before development can proceed.

Planning condition

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning Obligation

A legal agreement entered into under Section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Playing field

The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010.

Playing pitches

Pitches for playing sports covering football, cricket, rugby, hockey, rugby league and baseball.

Pollution

Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity.

Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.

Previously Developed Land

Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development control procedures; land in built up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed structure have blended into the landscape.

Primary shopping area

Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

Priority habitats and species

Species and Habitats of Principle Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Ramsar sites

Wetlands of international importance, designated under the 1971 Ramsar Convention. The Convention on wetlands is an intergovernmental treaty that provides framework for national action and international cooperation for the conservation and wise use of wetlands and their resources.

Renewable and low carbon energy

Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

River Nene Regional Park

An independent community interest company creating a green infrastructure network of environmental projects along the River Nene.

Rural exception sites

Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Safeguarding zone

An area defined in Circular 01/03: Safeguarding aerodromes, technical sites and military explosives storage areas, to safeguard such sites.

A plan providing a large-scale assessment of the risk to people and to the developed, historic and natural environment associated with coastal processes.

Setting of a heritage asset

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surrounding evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, and may affect the ability to appreciate the significance or may be neutral.

Significance (for heritage policy)

The value of a heritage asset to this and future generations because of its heritage interests. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Site investigation information

Includes a risk assessment of land potentially affected by contamination, or ground stability and slope stability reports, as appropriate. All investigations of land potentially affected by contamination should be carried out in accordance with established procedures (such as BS10175 (2001) Code of Practice for the Investigation of Potentially Contaminated Sites). The minimum information that should be provided by an applicant is the report of a desk study and site reconnaissance.

Site of Specific Scientific Interest (SSSI)

Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Social Infrastructure

Includes education, healthcare, sports facilities, cultural and community facilities.

South East Midlands Local Economic Partnership (SEMLEP)

This is a locally owned partnership between the local authorities and businesses. They are responsible for determining their local economic priorities and undertaking activities to drive economic growth and create local jobs.

Special Areas of Conservation

Areas given special protection under the European Union's Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.

Special Protection Areas

Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

Sports facilities

Includes sports hall, swimming pools, health and fitness, athletics, squash, gymnastics, bowls, tennis, golf, village and community halls, cycling, netball, judo, countryside and water sports, rowing, canoeing and orienteering.

Stepping stones

Pockets of habitat that, while not necessarily connected, facilitate the movement of species across otherwise inhospitable landscapes.

Strategic Environmental Assessment

A procedure set out in the Environmental Assessment of Plans and Programmes Regulations 2004, which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment. This accords with the European SEA Directive (2001/42/EC) requires a formal environmental assessment of certain plans and programmes, including those in the field of planning and land use.

Strategic policies

Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.

Sustainability Appraisal

This examines the impacts of the JCS strategies/ policies against a large number of economic, social and environmental sustainability objectives. It also provides an indication of what measures may need to be taken to minimise/ eliminate any adverse impacts and promote sustainable development. The Planning and Compulsory Purchase Act requires an SA to be undertaken for all Local Plans throughout the plan making process.

Sustainable Urban Extensions

Planned expansion of a city or town that can contribute to creating more sustainable patterns of development when located in the right place, with well-planned infrastructure including access to a range of facilities and when developed at appropriate densities.

Supplementary Planning Documents (SPDs)

Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainable transport modes

Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.

Town Centre

Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centre or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Transport Assessment

A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.

Transport Statement

A simplified version of a transport assessment where it is agreed the transport issues arising out of development proposals are limited and a full transport assessment is not required.

Travel Plan

A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.

Veteran Tree

A tree which, because of its great age, size or condition is of exceptional value for wildlife, in the landscape, or culturally.

Viability Study

An assessment of a proposed development to ensure all elements for the development, including required infrastructure and any required financial contributions can be successfully delivered in an economic context.

Wildlife Corridor

Areas of habitat connecting wildlife populations.

Windfall Sites

Sites not specifically identified in the development plan.

APPENDIX A: NORTHAMPTON HOUSING TRAJECTORY FOR SITES ALLOCATED IN THE LOCAL PLAN PART 2 (excluding Sustainable Urban Extensions)

Ref	Site Name	Yield	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	F
0168	Rowtree Road	131	5	10	10	10	15	15	15	15	15	21	131
0171	Quinton Read	19					9	10					19
0174	Ransome Road Gateway	24		8	8	8							24
0193	Former Lings Upper School	60 (HLS)											
0195	Hunsbury School, Hunsbury Hill (new application 73)	50 (HLS) 73											0
0204	The Farm, Hardings-stone	100		25	25	25	25						
0205	Parklands Middle School, Devon Way	132 (HLS)											0
0288	Railway Station (car park)	68 (HLS)											0
0333	Railway Station (railfreight)	200						40	40	40	40	40	200
0335	Great Russell Street / Chronicle & Echo North	42 (6 in HLS) —net 36		10	10	10	6						36
0336	Site rear of Aldi, Former Chronicle & Echo	14 (HLS)											0

Ref	Site Name	Yield	2019 +20	2020 +21	2021 +22	2022 +23	2023 +24	2024 +25	2025 +26	2026 +27	2027 +28	2028 +29	T
0338	Countess Road SYHLS (64) Additional capacity 4	68 (64 in HLS)		4									4
0403	Allotments, Studland Road	23		11	12								23
0629	British Timkin Site	138 (HLS)											0
0657	Fraser Road	140		20	20	20	20	20	20	20			140
0685	12 Pennycross Place, Ecton Brook	12				6	6						12
0719	Car Garage Workshop, Harlestane Road	35			11	12	12						35
0720	Ryland Seans Garage, Harlestane Road	62			20	21	21						62
0767	Spencer Street	25 (HLS)											
0903	Hawkins Shoe Factory, Overstone Road	105 (HLS)											0
0910	379 Harlestane Road	14				7	7						14
0932	Southbridge Site 1	44 (HLS)						15	15	14			44

Ref	Site Name	Yield	2019 +20	2020 +21	2021 +22	2022 +23	2023 +24	2024 +25	2025 +26	2026 +27	2027 +28	2028 +29	T
0933	Southbridge Site 2	50 (HLS)						20	20	10			50
1006	Pineham	106							30	40	36	106	
1007	Land south of Wooldale Road, east of Wootten Road	22				11	11						22
1009	Land west of Policy N5 Northampton South SUE (Site 1)	100						20	20	20	20	20	100
1010	Land at St Peter's Way / Court Road / Freeschool Street	5							5				5
1013	Park Campus	653 (HLS)											0
1014	Avenue Campus	200	10	10	20	20	20	20	20	20	30	30	200
1022	Belgrave House	99 (HLS)											0
1025	Land to the west of Towcester Road	180		30	40	40	40	30					180
1026	Eastern Land Parcel, Buckton Fields	14				7	7						14
1036	Derwent Drive garage site	8				4	4						8

Ref	Site Name	Yield	2019 +20	2020 +21	2021 +22	2022 +23	2023 +24	2024 +25	2025 +26	2026 +27	2027 +28	2028 +29	T
1037	Swale Drive garage site and rear/unused land	6 (HLS)											0
1041	Newnham Road, Kingsthorpe	15			5	5	5						15
1048	Stenson Street	6			6								6
1049	Land off Arbour Court, Thorplands garage block (exclude woodland)	11				5	6						11
1051a	Land between Waterpump Court and Billing Brook Road	8				4	4						8
1052	Land rear of garages in Coverack Close	13			3	5	5						13
1058	Land off Oak Hill Drive, Ecton Brook	11				5	6						11
1060	Hayeswood Road, Lings	6				3	3						6
1071	2-sites off Medway Drive, near Meadow Close	9			3	3	3						9
1086a	2-parcels-of land-in Sunnyside Estate (Gosgrove Road)	6				3	3						6

Ref	Site Name	Yield	2019 +20	2020 +21	2021 +22	2022 +23	2023 +24	2024 +25	2025 +26	2026 +27	2027 +28	2028 +29	T
1086b	2 parcels of land in Sunnyside Estate (Chalcombe Road)	7				3	4						7
1094	Land off Holme cross Road	15			5	5	5						15
1096	Land off Mill Lane	14		4	4	4	2						14
1097	Gate Lodge	30			10	10	10						30
1098	The Green, Great Houghton	800		50	50	50	100	100	100	100	125	125	800
1099	Upton Reserve Site	40			10	15	15						40
1100	Hill Farm Rise, Hunsbury Hill (LWS on a small part of the site)	80			30	30	20						80
1102	Site east of Towcester Road	50				25	25						50
1104	Watering Lane, Collingtree	265		20	20	30	30	33	33	33	33	33	265
1107	Former Abington Mill Farm, land off Rushmere Road	125		25	30	30	30	10					125
1108	Horsley Road	35		15	20								35
1109	Mill Lane	6 (HLS)											0

Ref	Site Name	Yield	2019 +20	2020 +21	2021 +22	2022 +23	2023 +24	2024 +25	2025 +26	2026 +27	2027 +28	2028 +29	T
1113	Greyfriars	400			50	50	50	50	50	50	50	50	400
1114	Cedarwood Nursing Home, 492 Kettering Road	2 (HLS)											0
1117	133 Queens Park Parade	6 (HLS)								3	3	6	
1121	Upton Valley Way East	34 (HLS)											0
1123	83—100 Trinity Avenue	9 (HLS)											
1124	41—43 Derngate	7 (HLS)											0
1126	5 Primrose Hill	6 (HLS)											0
1127	32 Connaught Street	6				3	3						6
1131	The Leys Close, 39 Mill Lane	6 (HLS)											0
1133	Eastern District Social Club, Crestwood Road	5 (HLS)											0
1134	St Johns Railway Embankment	12				6	6						12
1137	Weetton	74			25	25	24						74

Ref	Site Name	Yield	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	T
1138	Land South of Old Bedford Read	7			7								7
1139	Merge Homes England plots in Ransome Read	200 (HLS)											0
1140	Land north of Milton Ham	224		25	25	25	25	25	25	25	24	224	
1142	Land to the west of Northampton South SUE (Site 2)	130						40	40	50			
	SUB TOTAL	15	267	479	545	578	407	373	377	381	382		
	5-YEAR TOTAL					1884					1920		
	TOTAL											3804	

Ref	Site Name	Yield in policy 13	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	TOTAL in policy 13
0171	Quinton Road	14					8	6				14
0174	Ransome Road Gateway	24				24						24
0193	Former Lings Upper School, Birds Hill Walk	60										0
0204	The Farm, Hardingstone	55			25	30						55
0288	Railway Station (car park)	280						140	140			280
0333	Railway Station (railfreight)	188							76	76	36	188
0335	Great Russell Street / Chronicle & Echo North	42			42							42
0338	Countess Road	68		68								68
0629	British Timken Site	121		94	23	4						121

Ref	Site Name	Yield in policy 13	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	TOTAL in policy 13
0719	Car Garage Workshop, Harlestone Road	35				12	12	11				35
0720	Ryland Soans Garage, Harlestone Road	62				21	21	20				62
0767	Spencer Street	25		10	15							25
0903	Hawkins Shoe Factory, Overstone Road	105			33	33	39					105
0910	379 Harlestone Road	14			7	7						14
0932	Southbridge Site 1	45				45						45
0933	Southbridge Site 2	28				28						28
1006	Pineham	80			35	45						80
1007	Land south of Wooldale Road, east of Wootton Road	16			8	8						16
1010	Land at St Peter's Way / Court Road / Freeschool Street	5					5					5
1013	Park Campus	585		137	55	100	120	173				585
1014	Avenue Campus	170				50	50	70				170
1022	Belgrave House	122				122						122
1025	Land to the west of Towcester Road	230			30	40	40	40	40	40		230
1026	Eastern Land Parcel, Buckton Fields	14		5	9							14
1036	Derwent Drive garage site	5		5								5
1048	Stenson Street	2		2								2
1049	Land off Arbour Court, Thorplands garage block	6		6								6
1052	Land rear of garages in Coverack Close	13			5	5	3					13
1071	2 sites off Medway Drive, near Meadow Close	9			3	3	3					9
1086a	2 parcels of land in Sunnyside Estate (Cosgrove Road)	6			3	3						6
1086b	2 parcels of land in Sunnyside Estate (Chalcombe Road)	7			3	4						7
1096	Land off Mill Lane	14		14								14
1098	The Green, Great Houghton	800							50	75	100	225
1100	Hill Farm Rise, Hunsbury Hill	80				30	30	20				80
1102	Site east of Towcester Road	60				30	30					60
1104	Watering Lane, Collingtree	265			20	30	30	30	30	30	30	200
1107	Former Abington Mill Farm, land of Rushmere Road	125			10	30	30	30	25			125
1108	Horsley Road	35				15	20					35
1109	Mill Lane	6			6							6

Ref	Site Name	Yield in policy 13	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	TOTAL in policy 13
1113	<u>Greyfriars</u>	400										0
1114	<u>Cedarwood Nursing Home, 492 Kettering Road</u>	31		31								31
1117	<u>133 Queens Park Terrace</u>	8			8							8
1123	<u>83-103 Trinity Avenue</u>	9		9								9
1124	<u>41 - 43 Derngate</u>	31		31								31
1126	<u>5 Primrose Hill</u>	6		6								6
1131	<u>The Leys Close, 39 Mill Lane</u>	3	3	3								3
1133	<u>Eastern District Social Club</u>	5			5							5
1134	<u>St Johns Railway Embankment</u>	12			6	6						12
1137	<u>Wootton Fields</u>	74			25	25	24					74
1139	<u>Ransome Road</u>	500				40	40	34	50	30	30	224
1140	<u>Land north of Milton Ham</u>	224			25	50	50	50	49			224
1144	<u>Land to the west of Northampton South SUE</u>	361								41	49	90
-	<u>SUB TOTAL</u>			421	401	840	555	624	460	292	245	
-	<u>5 YEAR TOTAL</u>											
-	<u>TOTAL</u>			5,485								3838

APPENDIX B: SUPERSEDED POLICIES

Northampton Local Plan 1997

Saved Policies in the Adopted Northampton Local Plan 1997		Replacement Policy Number and Title in the Northampton Local Plan Part 2	
E7	Skyline development	2 / 3	Placemaking / and Design
E9	Locally Important Landscape Area	27	Sustaining and enhancing existing, and supporting the creation of, Northampton's Green Infrastructure
E20	New development: (Design)	2, 4 / 3	Placemaking / and Design; amenity and layout
E26	Conservation Areas: development and advertisements	31	Protection and enhancements of designated and non-designated heritage assets
E28	Use of upper floors and other commercial premises	21	Residential development on upper floors
E29	Shopping environment: new or replacements shop front	2 / 3	Placemaking / and Design
E30	Shop front: external security protection	2 / 3	Placemaking / and Design
E35	Advertisements: in conservation areas	31	Protection and enhancements of designated and non-designated heritage assets
E36	Advertisement hoardings: express consent	3-2	Placemaking and Design
H10	Other housing development: backland development	2 / 3 4, 14	Placemaking / and Design; Amenity and layout; Type and mix of housing
H11	Other housing development: commercial property in primarily residential areas	13	Residential and other residential led allocations
H14	Residential development, open space and children's play facilities area	28	Providing Open Spaces
H16	Housing for the elderly	14	Type and mix of housing
H17	Housing for people with disabilities	14	Type and mix of housing

H18	Extensions	2, /3 + 4	Placemaking <u>and</u> /Design; / Amenity and Layout
H21	Conversion to flats	2, /3 + 4	Placemaking <u>and</u> /Design; / Amenity and Layout
H23	Conversion to flats	2, /3 + 4	Placemaking <u>and</u> /Design; / Amenity and Layout
H24	Conversion to flats	2, /3 + 4	Placemaking <u>and</u> /Design; / Amenity and Layout
H26	Conversion to flats – floors above shops	21	Residential Development on Upper Floors
H28	Hostels	11	Managing hotel growth
H29	Residential Institutions	14	Type and mix of housing
H30	Multiple occupation with a single dwelling	15	Delivering Houses in Multiple Occupation
H31	<u>Cumulative effect</u>	2	<u>Placemaking and Design</u>
H35	Childcare facilities	25	Childcare Provision
B5	Development policies for proposed business areas: Brackmills, Milton Ham and Pineham	17	Safeguarding Existing Employment Sites
B6	Support services	24 / 25	Community facilities/ Childcare Provision
B7	Brackmills: height considerations	2 /3	Placemaking <u>and</u> / Design
B8	Northampton Cattlemarket	17	Safeguarding Existing Employment Sites
B9	Pineham and Milton Ham: landscaping zone	2 / 3	Placemaking <u>and</u> / Design
B10	Pineham and Milton Ham	17	Safeguarding Existing Employment Sites
B11	Milton Ham: height considerations	2 / 3	Placemaking <u>and</u> / Design
B14	Development for non-business uses in business areas	2 / 3	Placemaking <u>and</u> / Design
B17	Use of land for open storage, salvage and recycling	18	Supporting New Employment Developments and Schemes Outside Safeguarded Sites
B19	Existing business premises in primarily residential area	16	Supporting New Employment Developments and Schemes Outside Safeguarded Sites

B20	Working from home	2 / 3	Placemaking <u>and</u> / Design
B22	Small businesses: up to 200 sq.m	18	Supporting New Employment Developments and Schemes Outside Safeguarded Sites
B23	Repair and maintenance of vehicles	18	Supporting New Employment Developments and Schemes Outside Safeguarded Sites
B31	Environmental impact of business development: new locality	2 / 3	Placemaking <u>and</u> / Design
B32	Environmental impact of business development: amelioration	2 / 3	Placemaking <u>and</u> / Design
B33	Environmental impact of business development: hazardous development	2 / 3	Placemaking <u>and</u> / Design
T11	Commercial uses in residential area	18	Supporting New Employment Developments and Schemes Outside Safeguarded Sites
T12	Development requiring servicing	2, /3 + 4	Placemaking <u>and</u> /Design; / Amenity and Layout
T14	Public transport – rail corridors	32	Designing Sustainable Transport and Travel
T16	Taxi services	32	Designing Sustainable Transport and Travel
T22	Provision for people with a disability	2, /3 + 4	Placemaking <u>and</u> /Design; / Amenity and Layout
R5	Town centre: change of use	8 / 12	Supporting Northampton Town Centre's role / Development of main town centre uses
R6	Town centre: primary shopping frontages		Not required
R7	Town centre: secondary shopping frontages		Not required
R9	District and local centres: change of use from shops	19	New Retail Developments and Retail Impact Assessment
R11	Shopping facilities/ local centre in major residential development	19	New Retail Developments and Retail Impact Assessment
R15	Car showrooms	2, /3 + 4	Placemaking <u>and</u> /Design; / Amenity and Layout

R16	Retail sales from petrol filling stations	19	New Retail Developments and Retail Impact Assessment
R17	Retailing from industrial premises	19	New Retail Developments and Retail Impact Assessment
L2	Community use of existing schools and colleges	23 / 24	Sports facilities and playing pitches / Community facilities
L10	Bradlaugh Fields	27	Sustaining and enhancing existing, and supporting the creation of, Northampton's Green Infrastructure
L12	Motor sports and motorised water sports		Not required
L13	Local community facilities	24	Community facilities
L24	Allotment gardens	28	Providing Open Spaces
L25	Alterative use of allotment land	13	Residential and other residential led allocations
L26	Leisure proposals: site specific		Not required
D4	Crow Lane (north): business or leisure	<u>17A</u>	Not suitable for allocation
D6	Delapre Abbey: office and conference centre	31	Protection and enhancements of designated and non-designated heritage assets
D9	M1 Junction 15a/ A43: suitable for single development with high standard of building design with a landscaped setting	38	Development Allocations
D12	Land north west of Kings Heath		Sustainable Urban Extension in the Joint Core Strategy
D13	Overstone Scout camping ground (off Billing Lane): residential or Public house/ hotel		Not required. Part of site now developed.
D16	St Edmunds Hospital: development guidelines given		Not required – under construction
D17	Southbridge area and power station site, Nunn Mills: residential, business and leisure		Not required – built
D20	Tweed Road (Pioneer Aggregates): development guidelines given	17	Safeguarding Existing Employment Sites
D22	Angel Street/ Bridge Street: retail or office		Not required – built

D23	Castle Yard, St Andrews Road: residential or business, safeguard future position of north west bypass	38	Development Allocations
D26	Freeschool Street: high density residential or residential and office with retail on frontage to Marefair	38 / 44	Development Allocations / Sites in Tanner Street, Green Street, St Peter's Way and Freeschool Street (LAA0167 / 0818 / 0931 / 1010)
D27	Lower Mounts: car park and leisure/ residential	38	Development Allocations
D28	St Andrews Street: residential and retail		Not required—various changes have taken place within the area
D29	St Johns car park: residential, leisure and parking		Not required—part of the site has been developed
D30	British Gas land, St Peter's Way: mix of leisure, retail and employment with a minor element of housing		Not required—site developed
D31	Victoria Street car park: office and car parking	38	Development Allocations
D32	Western Island, Lady's Lane	38	Development Allocations
D33	Wellington Street: office and retail		Not required. Not allocated in the Central Area Action Plan
D35	York Road: business or residential		Not required. Not allocated in the Central Area Action Plan

Central Area Action Plan 2013

Adopted Policies in the Central Area Action Plan 2013		Replacement Policy Number and Title in the Northampton Local Plan Part 2/ status update	
1	Promoting design excellence	2, / 3 / 4	Placemaking / and Design; / Amenity and Layout
2	Tall buildings	2, / 3 / 4	Placemaking / and Design; / Amenity and Layout
3	Public realm	2, / 3 / 4	Placemaking / and Design; / Amenity and Layout

4	Green infrastructure	27 / 28	Sustaining and enhancing existing, and supporting the creation of, Northampton's Green Infrastructure / Providing Open Spaces
5	Flood risk and drainage	7	Flood Risk and Water Management
6	Inner ring road	32 / 33 / 34	Designing Sustainable Transport and Travel / Highway network and safety / Transport schemes and mitigation
7	Bus interchange: Fishmarket		Policy implemented
8	Safeguarded public transport route	32 / 33 / 34	Designing Sustainable Transport and Travel / Highway network and safety / Transport schemes and mitigation
9	Pedestrian and cycle movement framework	32 / 33 / 34	Designing Sustainable Transport and Travel / Highway network and safety / Transport schemes and mitigation
10	Parking	35	Parking standards
11	Town Centre boundary	8 / 12 / 19	Supporting Northampton Town Centre's role / Development of main town centre uses / New Retail Developments and Retail Impact Assessment
12	Definition of Primary Shopping Area	8 / 19	Supporting Northampton Town Centre's role / New Retail Developments and Retail Impact Assessment
13	Improving the retail offer		Superseded by the NPPF (2019). No longer required
14	Meeting retail capacity	19	New Retail Developments and Retail Impact Assessment
15	Office and business use	17, 17A, + 18	Safeguarding Existing Employment Sites; <u>Employment Allocations;</u> +

			Supporting New Employment Developments and Schemes Outside Safeguarded Sites
16	Central Area living	13 / 14	Residential and other residential led allocations / Type and mix of housing
17	Grosvenor Centre redevelopment	<u>13, 17A,</u> <u>38 - 42</u>	<u>Residential and Other Residential Led Allocation;</u> <u>Employment Allocations;</u> <u>Development Allocations -</u> Greyfriars
18	Abington Street East	12 / 19	Development of main town centre uses / New Retail Developments and Retail Impact Assessment
19	Castle Station	<u>13, 39</u>	<u>Policy implemented</u> <u>Residential and Other Residential Led Allocation;</u> <u>Northampton Railway Station (LAA0288); Railfreight and Adjoining Sites (LAA0333)</u>
20	St Johns		Policy implemented
21	Angel Street		Policy implemented
22	Bridge Street		Majority of the area affected by the policy now implemented
23	Upper Mounts/ Great Russell Street <i>Checking if housing element has been completed and, if so, delete.</i>	<u>13</u> <u>38</u>	<u>Development Allocations</u> <u>Residential and Other Residential Led Allocation</u>
24	Spring Boroughs		Not required. The site is covered by Spring Boroughs Neighbourhood Plan (made 2016)
25	The Waterside	<u>38</u> <u>-2</u>	<u>Development Allocations</u> <u>Placemaking and Design</u>
26	The Waterside: Brampton Branch St Peter's Way	<u>38</u> <u>-17A</u>	<u>Development Employment Allocations</u>

27	The Waterside: Southbridge West	38	Mostly developed. Remaining sites covered by Development Allocations
28	The Waterside: Avon / Nunn Mills / Ransome Road	<u>10, 13,</u> <u>17, 43</u>	<u>Policy implemented</u> <u>Supporting and Safeguarding the University of Northampton Waterside Campus; Residential and Residential Led Allocation;</u> <u>Safeguarding Existing Employment Sites; Ransome Road (LAA1139)</u>
29	The Waterside: Becket's Park	<u>38 / 13,</u> 27, 28	<u>Development Allocations / Residential and Residential Led Allocation;</u> Sustaining and enhancing existing, and supporting the creation of, Northampton's Green Infrastructure; Providing Open Spaces
30	The Waterside: Nene Meadows	27 / 28	Sustaining and enhancing existing, and supporting the creation of, Northampton's Green Infrastructure / Providing Open Spaces
31	Market Square	8 / 9	Supporting Northampton Town Centre's role / Regeneration Opportunities in the Central Area
32	Drapery	8 / 12 / 19	Supporting Northampton Town Centre's role / Development of main town centre uses / New Retail Developments and Retail Impact Assessment
33	Freeschool Street	<u>38-13, 44</u>	<u>Development Allocations</u> <u>Residential and Residential Led Allocation;</u> Sites in Tanner Street, Green Street, St. Peter's Way and Freeschool Street (LAA0167 / 0818 / 0931 / 1010)
34	Former Royal Mail Sorting Office		Policy implemented
35	Telephone Exchange, Spring Gardens	17	Safeguarding Existing Employment Sites

36	Infrastructure Delivery	37	Infrastructure Delivery and Contributions
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West Northamptonshire Joint Core Strategy 2014

<u>Policy Number in West Northamptonshire Joint Core Strategy</u>	<u>Policy Title in West Northamptonshire Joint Core Strategy</u>	<u>Replacement Policy Number in this Plan</u>	<u>Replacement Policy title in this Plan</u>
N2	<u>Northampton Central Area</u>	<u>12</u> <u>19</u>	<u>Development of Main Town Centre Uses</u> <u>New Retail Developments and Retail Impact Assessment</u>

APPENDIX C: NORTHAMPTON INFRASTRUCTURE REQUIREMENTS

Traffic Modelling and Analysis for Northampton Local Plan Part 2 (Northamptonshire County Council 2020)

Traffic modelling has been undertaken to examine the traffic impacts of the development proposed within the Local Plan Part 2.

The proposed development sites within this local plan were added to the baseline development included in the Northamptonshire Strategic Transport Model, which for West Northamptonshire (including Northampton) included all the sites included in the Joint Core Strategy and other consented sites.

While Northampton experiences very busy traffic in some areas, the network is coping reasonably well with the level of development that has been tested.

Overall the results do 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.

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.

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.

1. Rowtree Road approach to the A45 Wootton Fields interchange – Junction improvements required to support Northampton South SUE.
2. Bedford Road, Newport Pagnell Road, The Green

To accommodate development at The Green, Great Houghton (site LAA1098) the following is required:

- Significant upgrading of The Green
 - 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.
3. London Road / Cotton End Junction – Development off Ransome Road (sites LAA0174 and LAA1139) will be expected to provide improvements to this junction.

4. Barrack Road / St. Georges Avenue and Kingsthorpe Road / Balfour Road Junctions – Improvements to the Barrack Road / St. Georges Road, and Kingsthorpe Road / Balfour Road junctions required to support the development of Avenue Campus (site LAA1014).

APPENDIX D: TRANSPORT AND INFRASTRUCTURE SCHEDULE (Northampton and Northampton Related Development Area)

Ref	Growth Location	Infrastructure Requirement	Required for Growth at	Delivery Body	Broad Phasing	Cost Est.	Funding Sources
Northampton & Northampton Related Development Area							
T1	NRDA	A45/M1 Northampton Growth Management Scheme	NRDA	NCC-WNC/HE	2019 Start	£12.24m	Developer
T2/ T3	Northampton (West)	North West Relief Road (A428 to A5199)	Northampton Kings Heath / Northampton West	Developer/WNC NCC	2020 Start, 2022 complete	£35m	Developer/ SEMLEP/ WNC NCC/NBC
T4	Northampton (West)	Sandy Lane Relief Road Phase 2 related to Upton Lodge Norwood Farm developments	Norwood Farm /Upton Lodge	Developer	2021	£7.59m	Developer/G rant Funded
T7	Northampton (West)	Kingsthorpe Corridor Improvements	Northampton (West)	NCC-WNC	2017 Start	£2.2m	NCC-WNC/ Developer/ Grant Funded
T9	NRDA	Plough Junction Improvements	Northampton St John's Area	NCC-WNC	Not known	£3m	Grant Funded
T12	NRDA	Bedford Road Bus Priority Improvements	Town Centre	NCC-WNC	Not known	£2.2m	NCC-WNC/ Developer
T13	NRDA	Wellingborough Road Bus Improvements	Northampton	NCC-WNC	Not known	£1.4m	NCC-WNC
T14	NRDA	Inter Urban Bus Service Improvement	Northampton	NCC-WNC	2010 ongoing	£1.2m	NCC-WNC
T15	NRDA	Cycle and Walking Routes, and Crossing	Northampton	NCC-WNC/ Sustrans	2010 ongoing	£14m	NCC-WNC/ Sustrans/ Developer
T16 b	Northampton (North)	A43 Corridor Improvements: Phase 1 b – Round Spinney to Moulton roundabout	Northampton North SUE	NCC-WNC	Completion expected in 2020	£14m	NEP/ NHB/ Developer/ Grant Funded
T16 d	Northampton (North)	A43 Corridor Improvements: Phase 3 – Overstone Grange to Holcot/Sywell roundabout	Northampton North SUE	NCC-WNC	2020 – 21	£20m	SEMLEP/ Developer/ NCC-WNC
T18	Northampton (North)	Local Multi Modal Interchange and Bus Route Improvement/Provision	Northampton North SUE	NCC-WNC	2015 ongoing	£2m	Developer
T19	Northampton (North)	Kettering Road Bus Priority	Northampton North SUE	NCC-WNC	2020 start	£1.5m	Developer-NCC WNC/ Grant funded
T20	Northampton (North)	Walking and Cycling Improvement	Northampton North SUE	NCC-WNC	Not known	£0.34m	Developer
T21	Northampton (West)	Potential Junction Provision/ Improvements	Northampton West SUE	NCC-WNC	2020 start	Not known	Developer
T22	Northampton (West)	Bus Route Improvement	Northampton West SUE	NCC-WNC	2020 start	£1.8m	Developer

T23	Northampton (West)	Walking and Cycling Improvement	Northampton West SUE	<u>NCC-WNC</u>	Not known	£0.23m	Developer
Ref	Growth Location	Infrastructure Requirement	Required for Growth at	Delivery Body	Broad Phasing	Cost Est.	Funding Sources
T24	Northampton (South)	Towcester Road Bus Priority related to Northampton South	Northampton South SUE	<u>NCC-WNC</u>	2019 start	£0.12m	Developer/ <u>NCC-WNC</u>
T25	Northampton (South)	Bus Route Improvement related to Northampton South	Northampton South SUE	<u>NCC-WNC</u>	Not known	£1.4m	Developer
T26	Northampton (South)	Walking and Cycling Improvement	Northampton South SUE	<u>NCC-WNC</u>	2019 start	£0.5m	Developer
T27	Northampton (South)	London Road Bus Priority	Northampton South of Brackmills SUE	<u>NCC-WNC</u>	2019 start	£2.7m	Developer/ <u>NCC-WNC</u>
T28	Northampton (South)	Bus Route Improvement	Northampton South of Brackmills SUE	<u>NCC-WNC</u>	2019 start	£1m	Developer
T29	Northampton (South)	Walking and Cycling Improvement	Northampton South of Brackmills SUE	<u>NCC-WNC</u>	2019 start	£0.5m	Developer
T30	Northampton (West)	Harlestone Road/Mill Lane Junction Improvements	Northampton Kings Heath SUE	<u>NCC-WNC</u>	2019 start	£3.7m	Developer
T31	Northampton (West)	Dallington to Kings Heath Road Improvements	Northampton Kings Heath SUE	<u>NCC-WNC</u>	2019 start	£3.6m	Developer
T32	Northampton (West)	Bus Route Improvement	Northampton Kings Heath SUE	<u>NCC-WNC</u>	2019 start	£4.3m	Developer
T33	Northampton (West)	Walking and Cycling Improvement	Northampton Kings Heath SUE	<u>NCC-WNC</u>	2019 start	£0.9m	Developer
T34	Northampton (North West)	Bus Route Improvement	Northampton North of Whitehills SUE	<u>NCC-WNC</u>	2019 start	£1.6m	Developer
T35	Northampton (North West)	Walking and Cycling Improvement	Northampton North of Whitehills SUE	<u>NCC-WNC</u>	2018 start	£2m	Developer
T36	Northampton (South)	Bus Route Improvement	Northampton Upton Park SUE	<u>NCC-WNC</u>	2019 start	£1.5m	Developer
T37	Northampton (South)	Walking and Cycling Improvement	Northampton Upton Park SUE	<u>NCC-WNC</u>	2019 start	£0.2m	Developer
T64	NRDA	Spencer Bridge Road Corridor Improvements	Wider Area	<u>NCC-WNC</u>	Not known	£3.5m	Not known
T66	NRDA	St James Mill Link Road	Northampton Waterside Enterprise Zone	<u>NCC-WNC</u>	2018 start	£2m	<u>NBC-WNC / SEMLEP</u>
Sub Total NRDA Transport Infrastructure Known Costs						£155.47-148.22m	

APPENDIX E: NORTHAMPTON GROWTH MANAGEMENT SCHEME (A45 Northampton Growth Management Scheme Projects)

A45 Northampton Growth Management Scheme Projects	Cost Est.
M1 Junction 15 Interchange	£2.31m
Wootton Interchange	£0.8m
Queen Eleanor Interchange	£1.49m
Brackmills Interchange	£1.32m
Barnes Meadow Interchange	£2.14m
Lumbertubs Interchange	£2.6m
Great Billing Interchange	£1.58m
Total	£12.24m

APPENDIX F: HEALTH INFRASTRUCTURE PROJECTS SCHEDULE

Ref	Growth Location	Infrastructure Requirement	Required for Growth at	Delivery Body	Broad Phasing	Cost Est.	Funding Sources
Northampton & Northampton Related Development Area (NRDA)							
H1	Northampton (South)	Contribution to improving Local Health Centres at Wootton Medical Centre and Grange Park Medical Centre	Northampton South, South of Brackmills SUEs, Avon Nunn Mills, Wootton Fields & Grange Park	NHSE/ NCCG/	2014	£0.9m	Developer
H2	Northampton NRDA (West)	Contribution required to develop a minimum 9 GP practice within multi-purpose building located on Kings Heath SUE	Northampton Kings Heath SUE & Northampton West SUE	NHSE/ NCCG/	2020-23	£3m	Developer/GPs
H3	Northampton NRDA (North/West)	Contribution towards Internal Refurbishment of existing GP practice	Northampton North of Whitehills SUE	NHSE/ NCCG/	2020-23	£0.6m	Developer
H4	Northampton NRDA (North)	Contribution towards internal refurbishment to provide GP services to meet needs of increasing population	Northampton Kings Heath SUE & Northampton West SUE	NHSE/ NCCG/	2020-23	TBC	Developer/GPs

APPENDIX G: PRIMARY EDUCATION

Ref	Growth Location	Infrastructure Requirement	Required for Growth at	Delivery Body	Broad Phasing	Cost Est.	Funding Sources
Northampton							
E3a	Northampton	One new three form entry Primary School at Norwood Farm	Norwood Farm	NCC-WNC	2022	£8m	NCC-WNC/ Developer
E3b	Northampton	One two form entry Primary School at Upton Lodge	Upton Lodge	NCC-WNC	2022	£6.5m	NCC-WNC/ Developer
E5	Northampton NRDA	New two form entry Primary School at Northampton South SUE	Northampton South SUE	NCC-WNC	2022	£7m	EFA/ Developer
E6	Northampton NRDA	New two form entry Primary School at Northampton South of Brackmills SUE	Northampton South of Brackmills SUE	NCC-WNC	2021	£7m	NCC-WNC/ Developer
E7	Northampton NRDA	Two x new two form entry Primary Schools at Northampton Kings Heath SUE	Northampton Kings Heath SUE	NCC-WNC	1 st by 2020	£14m	NCC-WNC/ Developer
E8	Northampton NRDA	New two form entry Primary School at Northampton Upton Park SUE	Northampton Upton Park SUE	NCC-WNC	2022	£7m	NCC-WNC/ Developer
E9	Northampton NRDA	New two form entry Primary School at Northampton North of Whitehills SUE	Northampton North of Whitehills SUE	NCC-WNC	2021	£7m	EFA/ Developer
E10	Northampton NRDA	Two new two form entry Primary Schools at Northampton North SUE. Half a form entry extension to Overstone Primary, and half a form entry to another local school.	Northampton North SUE	NCC-WNC	1 st by 2021/2	£15m	NCC-WNC/ Developer
E11	Northampton NRDA	Two new two form entry Primary Schools at Northampton West SUE	Northampton West SUE	NCC-WNC	2022	£14m	NCC-WNC/ Developer

E41	Northampton NRDA	New three form entry Primary School in Collingtree. (Wave 11 Free School : Approved)	Northampton	EFA	2023 onwards	£6.5m	ESFA
E42	Northampton NRDA	New two form entry Primary School in Duston (Wave 12 Free School Proposal)	Northampton	EFA	2021	£6.5m	ESFA

APPENDIX H: SECONDARY EDUCATION

Ref	Growth Location	Infrastructure Requirement	Required for Growth at	Delivery Body	Broad Phasing	Cost Est.	Funding Sources
Northampton							
E16	Northampton NRDA	New Secondary School (located at Northampton Kings Heath SUE) 8 to 10 form entry	Northampton	NCC-WNC	2022 onwards	£30m	NCC-/WNC/ Developer
E30	Northampton NRDA	New eight to ten form entry Secondary School to serve the South of Northampton	Northampton	NCC-WNC	2021	£10m	NCC-/WNC/ Developer
E33	Northampton NRDA	Extensions to existing Schools in the Northampton Town Centre area totalling three forms of entry.	Northampton	NCC-WNC	2018/19	£8m	NCC-/WNC/ Developer
E39	Northampton NRDA	New eight to ten form entry Secondary School in the North of Northampton (Moulton/ Overstone – Daventry Education area)	Northampton and Daventry	NCC-WNC	2020 onwards	£30m	NCC-/WNC/ Developer
E40	Northampton NRDA	New eight to ten form entry Secondary School in the West of Northampton (Upton area)	Northampton	NCC-WNC	Post 2020	£30m	NCC-/WNC/ Developer

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West Northamptonshire Council

Sustainability Appraisal

Main Modifications to the Northampton Local Plan

Part 2

Final report

Prepared by LUC

June 2022



West Northamptonshire Council

Sustainability Appraisal Main Modifications to the Northampton Local Plan Part 2

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Introduction

Proposed Main Modifications to the Northampton Local Plan Part 2

1.1 In February 2021, two inspectors were appointed to examine the 'soundness' of the Northampton Local Plan Part 2. WNC prepared a Proposed Schedule of Changes to the Policies Map (June 2021), Proposed Schedule of Main Modifications (November 2021) and Proposed Schedule of Additional Modifications (November 2021) in advance of and during the hearing sessions, which took place in November 2021. After the hearings, the Council updated their Proposed Main Modifications following further recommendations by the Planning Inspectors, which this SA Addendum relates to. The proposed modifications take into account the matters raised by representations, hearing statements and through the hearing sessions. The Inspectors consider these modifications necessary for soundness.

1.2 This SA Addendum presents the SA of the proposed Main Modifications to the Local Plan Part 2 and considers their implications for the SA findings reported previously. Together with the June 2020 SA Report and the subsequent addendum reports and erratum listed below, this addendum represents an appraisal of the Local Plan Part 2 as proposed to be modified, updating the findings that were presented in these two documents. This SA Addendum should therefore be read alongside the June 2020 SA Report and those subsequent SA documents.

Background

1.3 LUC was appointed by Northampton Borough Council (now part of West Northamptonshire Council) in September 2013 to carry out the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the Northampton Local Plan Part 2.

1.4 There have been eight key stages in the SA of the Northampton Local Plan Part 2 to date:

- An SA Scoping Report was published for consultation in March 2016.
- An SA Report that accompanied the Options Consultation Paper was published for consultation in August 2016.
- An SA Report that accompanied the Site Options document was published for consultation in September 2017.

- An SA Report that accompanied the Proposed Submission Local Plan Part 2 was published for Regulation 19 (Round 1) consultation in April 2019.
- An SA Report that accompanied the Proposed Submission Local Plan Part 2 was published for Regulation 19 (Round 2) consultation in June 2020.
- An SA Addendum was produced in June 2020 to clarify the appraisal findings in relation to the allocation by Policy 26 of Land adjoining Dallington Cemetery.
- An Erratum to Appendix D of the Regulation 19 (Round 2) SA Report was produced in October 2020 to flag that Appendix D incorrectly stated that site LAA0204: The Farm was a non-allocated site option when in fact it was allocated.
- An SA Addendum was produced in November 2021 to appraise the revised site boundary of The Green, Great Houghton (LAA1098), to include Hardingstone Lodge (LAA1098B).

Northampton Local Plan Part 2

1.5 The Northampton Local Plan Part 2 will replace all the remaining saved policies from the previous Northampton Local Plan 1997 and update the policies contained in the Northampton Central Area Action Plan, which was adopted in 2013. The Local Plan Part 2 comprises:

- Development management policies – policy directions for sustainable development, housing delivery, retention and expansion of employment opportunities, supporting the growth and changing roles of the town centre, providing commercial and leisure enterprises, as well as protecting and enhancing the built and natural environment.
- Site-specific allocation policies – for various types of developments and/or uses that are considered suitable for these sites.

Baseline and evidence update

1.6 Since the publication of the Proposed Submission Local Plan Part 2 (Round 2) in June 2020, the following additional evidence base documents of relevance to the SA have been produced.

- **Joint Authorities Monitoring Report 2019/20¹:** this document reports on the monitoring year 1st April 2019 to 31st March 2020. The contents of this document highlight similar trends to those outlined in previous Joint Authorities Monitoring Reports. However, there are some differences. For example, air quality monitoring undertaken by South Northamptonshire Council in 2019 showed a significant reduction in nitrogen dioxide within the Towcester AQMA, such that all monitoring locations within the AQMA were within the national air quality objective levels for nitrogen dioxide. However, concentrations at one location in the AQMA were still within 10% of the objective levels. There was an overall fall in housing completions between 2018/19 and 2019/20 but affordable dwelling completions increased slightly from 451 to 460, with a particularly significant increase of 140 dwellings in the Northampton Related Development Area. According to 2019 data, there has been an overall fall of 3,000 jobs in West Northamptonshire compared to 2018. This is the first fall in the number of jobs since 2012, mainly as a result of the COVID-19 pandemic. However, an overall net gain of 19,500 jobs over the period 2008-2019 indicates that West Northamptonshire is still on track to deliver its overall target of 28,000 additional jobs by 2029. With regard to biodiversity, the total land area designated as Local Wildlife Sites across West Northamptonshire in 2019/20 increased by 48.7ha compared to 2017/18, with net gains in all three council areas.
- **Five Year Housing Land Supply Assessment for Northampton (2021)²:** originally published in April 2021 and then updated in November 2021, this document concludes that the Council has deliverable sites with the capacity to meet the 5-year housing requirement, including student accommodation and housing for older people.

Update to review of policies, plans and programmes

1.7 Since the publication of the Proposed Submission Local Plan Part 2 (Round 2), the following documents of relevance to the SA have been produced or updated.

International

- **Declaration on Forests and Land Use (COP26 Declaration) (2021)³:** international commitment to halt and reverse forest loss and land degradation by 2030, while delivering sustainable development and promoting an inclusive rural transformation.

National

- **National Planning Policy Framework (2021)⁴:** the National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. A revised version of the NPPF was published in July 2021, replacing the NPPF published in March 2012, revised in July 2018 and updated in February 2019.
 - The NPPF promotes healthy, inclusive and safe places which promote social integration, are safe and accessible, and enable and support healthy lifestyles.
 - One of the core planning principles is to "take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community".
 - Local plans should "contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible". To determine the minimum number of homes needed strategic policies should be informed by the application of the standard method set out in national planning guidance, or a justified alternative approach.
 - "A network of high quality open spaces and opportunities for sport and recreation is important for the health and well-being of communities".
 - "Good design is a key aspect of sustainable development" and requires development supported by planning decisions to function well and add to the overall quality of the area over its lifetime. Planning decisions should result in development which is of a quality which incorporates good architecture and appropriate and effective landscaping as to promote visual attractiveness, raise the standard more

¹ West Northamptonshire Joint Planning Unit (2020). Joint Authorities Monitoring Report 2019/20. (see <https://www.northampton.gov.uk/downloads/file/12916/exam-37-joint-annual-monitoring-report-2019-20>)

² West Northamptonshire Council (2021). Five Year Housing Land Supply Assessment for Northampton. (see https://www.northampton.gov.uk/downloads/file/5202/5-year_housing_land_supply-2012)

³ United Nations (2021). Declaration on Forests and Land Use. (see <https://ukcop26.org/glasgow-leaders-declaration-on-forests-and-land-use/>)

⁴ Ministry for Housing, Communities & Local Government (MHCLG) (2021). National Planning Policy Framework. (see <https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

- generally in the area, and address the connections between people and places.
- The promotion of retaining and enhancing of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship.
 - Developments should create safe and accessible environments where crime and disorder, and fear of crime, do not undermine quality of life or community cohesion.
 - There is a need to take a “proactive, positive and collaborative approach” to bring forward development that will “widen choice in education”, including sufficient choice of school places.
 - Paragraph 73 states that “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”. As such, the NPPF provides support for the identification of locations which are suitable for this type of development in a manner which would help to meet needs identified in a sustainable way.
- **National Planning Practice Guidance (2021)⁵:** the national Planning Practice Guidance (PPG) is an online resource that is continuously being updated. Since the preparation of the Proposed Submission (Round 2) version of the SA Report, the following updates have been made:
- 24th June 2021: section added on 'Fire safety and high-rise residential buildings (from 1 August 2021).
 - 24th May 2021: section added on 'First Homes'.
- **National Design Guide (2021)⁶:** this document was first published in October 2019 and amended in January 2021 to align with the National Model Design Code and Guidance Notes for Design Codes. The document sets out the characteristics of well-designed places and demonstrates what good design means in practice. The document defines ten characteristics of well-designed places: (1) context; (2) identity; (3) built form; (4) movement; (5) nature; (6) public spaces; (7) uses; (8) homes and buildings; (9) resources; and (10) lifespan.
- **National Model Design Code (2021)⁷:** this document provides detailed guidance on the production of design codes, guides and policies to promote successful design. It expands on the ten characteristics of good design set out in the National Design Guide, which reflects the Government's priorities and provides a common framework for design.
- **Building for a Healthy Life (2020)⁸:** this document is the latest edition (and new name for) Building for Life 12. Building for a Healthy Life updates England's most widely known and most widely used design tool for creating places that are better for people and nature. It is a Design Code that helps people improve the design of new and growing neighbourhoods. It is structured around the following 12 considerations: natural connections; walking, cycling and public transport; facilities and services; homes for everyone; making the most of what is there; a memorable character; well defined streets and spaces; easy to find your way around; healthy streets; cycle and car parking; green and blue infrastructure; and back of pavement, front of home.
- **Levelling Up the United Kingdom (2022)⁹:** this White Paper sets out how opportunities will be spread more equally across the UK. The White Paper proposes a new policy regime that will reverse historical trends in disparity and which is based on five mutually reinforcing pillars:
- The UK Government is setting clear and ambitious medium-term missions to provide consistency and clarity over levelling up policy objectives.
 - Central government decision-making will be fundamentally reoriented to align policies with the levelling up agenda and hardwire spatial considerations across Whitehall.
 - The UK Government will empower decision-makers in local areas by providing leaders and businesses with the tools they need.

⁵ Department for Levelling Up, Housing and Communities (DLUHC) and MHCLG (2021). Planning Practice Guidance. (see <https://www.gov.uk/government/collections/planning-practice-guidance>)

⁶ Department for Levelling Up, Housing and Communities (DLUHC) and MHCLG (2021). National Design Guide. (see <https://www.gov.uk/government/publications/national-design-guide>)

⁷ DLUHC and MHCLG (2021). National Model Design Code. (see <https://www.gov.uk/government/publications/national-model-design-code>)

⁸ Homes England (2020). Building for a Healthy Life. (see https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf)

⁹ HM Government (2022). Levelling Up the United Kingdom. (see <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>)

- The UK Government will transform its approach to data and evaluation to improve local decision-making.
- The UK Government will create a new regime to oversee its levelling up missions, establishing a statutory duty to publish an annual report analysing progress and a new external Levelling Up Advisory Council.
- **Levelling Up and Regeneration Bill (2022)**¹⁰: on 11th May 2022, the Government published the Levelling Up and Regeneration Bill, which sets out in detail the Government's proposals for reforming the planning system. Amongst other things, the Bill proposes the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however, at present the requirement for SEA remains as set out in existing legislation.
- **Build Back Better: Our Plan for Health and Social Care (2021)**¹¹: this document sets out the Government's new plan for health and social care. It provides an overview of how this plan will tackle the electives (i.e. non-emergency tests or treatments) backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the Government will provide for the social care system, and how the Government will improve the integration of health and social care. It explains the Government's plan to introduce a new Health and Social Care Levy.
- **Build Back Better: Our Plan for Growth (2021)**¹²: this document sets out the Government's plans to support economic growth through significant investment in infrastructure, skills and innovation.
- **COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)**¹³: sets out the Government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.
- **Planning for the Future (2020)**¹⁴: sets out a series of potential reforms to the English planning system, to deliver growth faster. The White Paper focuses on the following:
 - Simplifying the role of Local Plans and the process of producing them.
 - Digitising plan-making and development management processes.
 - Focus on design, sustainability and infrastructure delivery.
 - Nationally determined, binding housing requirements for local planning authorities to deliver through Local Plans.
- **The Charter for Social Housing Residents: Social Housing White Paper (2020)**¹⁵: sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.
- **Using the planning system to promote healthy weight environments¹⁶ (2020), Addendum (2021)**¹⁷: provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on

¹⁰ DLUHC (2022). Levelling Up and Regeneration Bill. (see <https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill>)

¹¹ Prime Minister's Office, 10 Downing Street, Cabinet Office and Department of Health and Social Care (DHSC) (2021). Build Back Better: Our Plan for Health and Social Care. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care>)

¹² HM Treasury (2021). Build Back Better: Our Plan for Growth. (see <https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth>)

¹³ DHSC and Cabinet Office (2021). COVID-19 Mental Health and Wellbeing Recovery Action Plan. (see <https://www.gov.uk/government/publications/covid-19-mental-health-and-wellbeing-recovery-action-plan>)

¹⁴ DHCLG (2020). Planning for the Future White Paper. (see <https://www.gov.uk/government/consultations/planning-for-the-future>)

¹⁵ MHCLG (2020). The Charter for Social Housing Residents: Social Housing White Paper. (see <https://www.gov.uk/government/publications/the-charter-for-social-housing-residents-social-housing-white-paper>)

¹⁶ PHE (2020). Guidance and Supplementary Planning Document Template for Local Authority Public Health and Planning Teams. (see <https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system>)

¹⁷ Public Health England (2021). Addendum: Hot food Takeaways Use in the New Use Class Order. (see <https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system/addendum-hot-food-takeaways-use-in-the-new-use-class-order>)

the hot food takeaways and retail uses, and sets out recommended actions in light of changes to the Use Class Order in England from 1st September 2020.

- **Public Health England Strategy 2020 to 2025 (2019)¹⁸:** identifies Public Health England's (PHE) priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.
- **The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹⁹:** protects biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.
- **Agriculture Act 2020²⁰:** legislation setting out how farmers and land managers in England will be rewarded in the future with public money for "public goods" – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. These incentives will provide a vehicle for achieving the goals of the Government's 25 Year Environment Plan and commitment to reach zero emissions by 2050. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace.
- **Agricultural Transition Plan 2021 to 2024 (2020)²¹:** sets out the changes going to be made to agricultural policy in England from January 2021 to the end of 2027. Between 2021 and 2027, the Government will gradually phase out direct payments and introduce a new system based on the principle of public money for public goods. The Government will pay farmers and land owners to improve the environment, animal health and welfare, and reduce carbon emissions. There will be three levels of support aimed at paying for sustainable farming practices, creating habitats for nature recovery and making landscape-scale change such as establishing new woodland and other ecosystem services. Some options will be universally open to all farmers and land managers, while others will be more targeted at a smaller number of large projects. There will also be significant grants made available to support farmers to reduce their costs and improve their profitability, to help those who want to retire or leave the industry, and to create new opportunities and support for new entrants coming into the industry.
- **Decarbonising Transport: A Better, Greener Britain (2021)²²:** sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. The document sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly.
- **Decarbonising Transport: Setting the Challenge (2020)²³:** sets out the strategic priorities for the new Transport Decarbonisation Plan (i.e. Decarbonising Transport: A Better, Greener Britain), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the Transport Decarbonisation Plan takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

¹⁸ Public Health England (2019). PHE Strategy 2020 to 2025. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE_Strategy_2020-25.pdf)

¹⁹ HM Government (2019). The Conservation of Habitats and Species Regulations. (see <https://www.legislation.gov.uk/ukdsi/2019/978011176573/schedules>)

²⁰ HM Government (2020). Agriculture Act 2020. (see <https://www.legislation.gov.uk/ukpga/2020/21/contents/enacted/data.htm>)

²¹ Department for Environment, Food and Rural Affairs (Defra) (2020). Agricultural Transition Plan 2021 to 2024. (see <https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024>)

²² Department for Transport (DfT) (2021). Decarbonising Transport: A Better, Greener Britain. (see <https://www.gov.uk/government/publications/transport-decarbonisation-plan>)

²³ DfT (2020). Decarbonising Transport: Setting the Challenge. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf)

■ **The Waste (Circular Economy) (Amendment)**

Regulations 2020²⁴: seeks to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment processes represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

■ **Environment Act 2021²⁵:** the Act is a key vehicle for delivering the bold vision set out in the 25 Year Environment Plan. An important aspect of the Environment Act is the power to set long-term, legally-binding environmental targets. Setting targets will provide a strong mechanism to deliver long-term environmental outcomes. It requires Government to set at least one target in four priority areas: air quality, biodiversity, water and resource efficiency, and waste reduction, as well as a target for fine particulate matter (PM2.5). These targets need to be brought forward by 31st October 2022. Long-term targets will be supported by interim targets, which will set a five year trajectory towards meeting the long-term targets.

■ **UK Hydrogen Strategy (2021)²⁶:** sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030.

■ **Energy White Paper: Powering Our Net Zero Future (2020)²⁷:** sets out how the UK will clean up its energy system and reach net zero emissions by 2050.

■ **Technical Housing Standards – Nationally Described Space Standard²⁸:** published in 2015, this document

sets out the Government's new nationally described space standard. The standard deals with internal space within new dwellings and sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home (this item was previously omitted from the review of policies, plans and programmes in error).

Local

■ **Addendum to the Upper Nene Valley Gravel Pits SPA SPD: Mitigation Strategy²⁹:** sets out the Strategic Access Management and Monitoring (SAMM) mitigation costs for residential developments that fall within the 3km catchment. The mitigation funded by the contribution will ensure that there is no recreational pressure adverse effect on the integrity of the SPA. Alternatively, applicants can undertake their own project level Appropriate Assessment and provide the mitigation that is required through that assessment. Developments of 10 dwellings or more will be required to pay the SAMM charge and/or provide other suitable mitigation and the advice of Natural England should be sought at the outset of the planning process.

Neighbourhood Plans

1.8 Neighbourhood Plans, once adopted, form part of the development plan for a local authority area. There are four 'made' (adopted) Neighbourhood Plans within the Northampton plan area:

- Great Houghton Neighbourhood Plan (2022)³⁰;
- Growing Together Neighbourhood Plan for Blackthorn, Cherry Lodge, Goldings, Lings; Lumbertubs and Overstone Lodge (2017)³¹;
- Spring Boroughs Neighbourhood Plan (2016)³²; and

²⁴ HM Government (2020). The Waste (Circular Economy) (Amendment) Regulations 2020. (see <https://www.legislation.gov.uk/ukesi/2020/904/contents/made>)

²⁵ HM Government (2020). Environment Act 2021. (see <https://www.legislation.gov.uk/ukesi/2020/904/contents/made>)

²⁶ Department for Business, Energy and Industrial Strategy (DBEIS) (2021). UK Hydrogen Strategy. (see <https://www.gov.uk/government/publications/uk-hydrogen-strategy>)

²⁷ DBEIS (2020). Energy White Paper: Powering Our Net Zero Future (see <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>)

²⁸ DCLG (2015). Technical Housing Standards – Nationally Described Space Standard. (see <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>).

²⁹ West Northamptonshire Council (2022). Addendum to the Upper Nene Valley Gravel Pits SPA SPD: Mitigation Strategy. (see: <https://www.northampton.gov.uk/download/downloads/id/12918/unvgp-spa-spd-addendum-mitigation-strategy-march-2022.pdf>)

³⁰ Great Houghton Parish Council (2022). Great Houghton Neighbourhood Development Plan. (see <https://www.northampton.gov.uk/download/downloads/id/12982/01---ghndp---made-version.pdf>)

³¹ Growing Together Neighbourhood Forum (2017). Growing Together Neighbourhood Plan. (see <https://www.northampton.gov.uk/download/downloads/id/10249/20170310-gtnp-made-version-april-formatted.pdf>)

³² Spring Boroughs Voice (2016). Spring Boroughs Neighbourhood Plan. (see <https://www.northampton.gov.uk/download/downloads/id/8958/spring-boroughs-neighbourhood-plan-made-version.pdf>)

- Duston Neighbourhood Plan (2015)³³.

Neighbouring authorities' Local Plans

1.9 WNC was formed as a Unitary Council on 1st April 2021 and comprises the former councils of Northampton Borough Council, Daventry District Council and South Northamptonshire Council. Once the Local Plan Part 2 is adopted, the West Northamptonshire Development Plan will consist of the following hierarchy of policy documents:

- West Northamptonshire Joint Core Strategy Local Plan Part 1 – covering strategic issues across all of West Northamptonshire.
- Northampton Local Plan Part 2 – covering more detailed issues for Northampton plan area only.
- Settlements and Countryside Local Plan Part 2 for Daventry District 2011-2029 – covering more detailed issues for Daventry District only.
- South Northamptonshire Local Plan Part 2 2011-2029 – covering more detailed issues for South Northamptonshire District only.
- 'Made' Neighbourhood Plans – covering locally significant issues for particular parts of the Northampton plan area.
- Northamptonshire Minerals and Waste Local Plan – covering the land use planning strategy for minerals and waste related development in Northamptonshire County.

1.10 The Borough Council of Wellingborough, located to the north east of Northampton Borough, adopted the Plan for the Borough of Wellingborough in February 2019. The Plan forms Part 2 of the Development Plan for Wellingborough Borough, which merged with Corby, East Northamptonshire and Kettering Districts in 2021 to form the new unitary authority of North Northamptonshire.

Methodology

1.11 The approach to assessing the SA implications of the proposed Main Modifications firstly involved considering each proposed modification as set out in the Schedule of Main Modifications. A column was added to the Schedule of Main Modifications to consider and record whether the proposed modification would be likely to change the SA findings presented in the June 2020 SA Report and subsequent erratum and addendum reports. Many of the proposed modifications relate to the supporting text to the policies. To

ensure consistency with previous iterations of the SA, the implications of the proposed modifications to the supporting text were considered together with the proposed modifications to the policy wording. The Schedule of Main Modifications with the additional SA implications column is presented in **Appendix A** of this SA Addendum, with the findings summarised at the end of this report.

1.12 In addition to the Schedule of Main Modifications, some minor changes to the boundaries of sites LAA0204, LAA1098, LAA1113r and LAA1113c were made, which are not presented in the Schedule of Main Modifications but are instead presented in the Schedule of Changes to the Policies Map. Due to the small number of modifications, it was not considered necessary to include a copy of the Schedule of Changes to the Policies Map within this SA Addendum. Any changes to the effects previously recorded for these sites are outlined in the 'SA of Main Modifications to site allocations' section of this report.

1.13 Appraisal matrices for new or rewritten development management policies are provided in **Appendix B**. Appraisals of new or rewritten site-specific allocation policies are provided in **Appendix C**.

SA framework

1.14 The proposed Main Modifications were appraised in relation to their likely effect on the sustainability objectives set out in the SA framework.

1.15 The assessments reported in this document used the same sustainability objectives that provided the framework for the SA work at earlier stages of plan preparation, as reproduced in **Table 1.1** below. The SA objectives are set out in the first column of **Table 1.1**, with sub questions set out in the second column. The sub questions are not intended to be exhaustive but helped to guide identification of the likely sustainability effects of the Local Plan Part 2. The final column of the table identifies which of the topics specified in the SEA Regulations are addressed by each SA objective.

1.16 **Appendix D** of this Addendum outlines the criteria used to guide assessment of the proposed residential and employment site allocations by SA objective. **Table D.1** presents the assessment criteria for the residential sites, whilst **Table D.2** presents the assessment criteria for the employment sites.

Form of assessment and use of SA matrices

1.17 The SA uses colour-coded symbols to indicate the likely sustainability effects of a policy or site allocation on each SA

³³ Duston Parish Council (2015). Duston Neighbourhood Plan: Made Version. (see

<https://www.northampton.gov.uk/download/downloads/id/8670/duston-neighbourhood-plan---made-version-december-2015.pdf>

objective. **Figure 1.1** shows how these symbols were applied during the appraisals.

Figure 1.1: Key to symbol and colour coding used in the SA

++	Significant positive effect likely
+	Minor positive effect likely
0	No or negligible effect likely
N/A	Assessment criterion not applicable
-	Minor negative effect likely
--	Significant negative effect likely
+/-	Mixed effect likely
?	Likely effect uncertain

Table 1.1: SA framework

SA objectives	Sub questions: Will the policy or proposal...	SEA Regulations topics covered
1. Help make suitable housing available and affordable according to the needs of Northampton's population.	<ul style="list-style-type: none"> ■ Provide for a range of housing type and tenure to meet identified housing needs? ■ Provide homes for an ageing population? ■ Provide affordable and social housing to meet identified needs? ■ Improve the housing stock, in particular in more deprived communities? 	Material assets
2. Reduce the need to travel within, to and from Northampton by providing easy access to jobs, services and facilities and to sustainable travel alternatives to the car.	<ul style="list-style-type: none"> ■ Improve the provision of public transport services? ■ Improve walking and cycling networks? ■ Be within walking and/or cycling distance of the town centre, or on frequent public transport routes to, the town centre? ■ Be within walking and/or cycling distance of, or on frequent public transport routes to, designated employment areas? ■ Be within walking distance of local centres? 	Air Population Human health Climatic factors
3. Provide easy access to primary and secondary schools by sustainable modes.	<ul style="list-style-type: none"> ■ Be within walking distance of primary schools? ■ Be within walking and/or cycling distance of secondary schools? 	Air Population Human health Climatic factors
4. Improve the health and well-being of Northampton's residents, promoting healthy lifestyles and reduce health inequalities.	<ul style="list-style-type: none"> ■ Improve access to health care? ■ Be within walking and/or cycling distance of sport and leisure facilities, or open space? ■ Improve access to outdoor and indoor sport and recreation facilities? ■ Improve access to open space and the countryside? ■ Limit the risk of air, noise or light pollution on local people? ■ Improve access to jobs for the most deprived communities in Northampton? 	Human health

SA objectives	Sub questions: Will the policy or proposal...	SEA Regulations topics covered
	<ul style="list-style-type: none"> ■ Improve access to places of worship? 	
5. Reduce crime and the fear of crime in Northampton.	<ul style="list-style-type: none"> ■ Reduce opportunities for crime? ■ Increase the perception of safety from crime? ■ Encourage access to, and the provision of, community and youth facilities in more deprived neighbourhoods? 	Population Human health
6. Facilitate the growth of Northampton's economy and the availability of jobs.	<ul style="list-style-type: none"> ■ Ensure a sufficient supply of land to meet local employment needs? ■ Encourage provision of a range of employment opportunities? ■ Provide opportunities for start-up companies and expansion of local companies, particularly in high-performance technologies, business and professional services? ■ Facilitate take-up of employment land and premises in the Northampton Waterside Enterprise Zone? ■ Enable access and improvements to communications technology (e.g. broadband)? 	Material assets
7. Maintain and strengthen the character and vitality of Northampton town centre.	<ul style="list-style-type: none"> ■ Safeguard and enhance the historic character and distinctiveness of the town centre? ■ Encourage the retention and expansion of town centre commercial and retail uses? ■ Provide for a range of homes within the town centre? ■ Facilitate the evening economy (e.g. restaurants, bars, and other leisure activity)? ■ Make the public realm safe and attractive to use by pedestrians? ■ Ensure that the town centre is adapted to extreme weather events as a result of climate change? ■ Provides for safe cycling routes and parking facilities? ■ Provides for safe and easy access to public transport services, including bus and rail? 	Cultural heritage Material assets Population Human health
8. Minimise Northampton's greenhouse gas emissions.	<ul style="list-style-type: none"> ■ Result in the generation of renewable energy? ■ Encourage energy conservation? ■ Minimise increases in greenhouse gas emissions from vehicles? 	Climatic factors

SA objectives	Sub questions: Will the policy or proposal...	SEA Regulations topics covered
9. Protect and enhance Northampton's biodiversity and geodiversity.	<ul style="list-style-type: none"> ■ Maintain the integrity of the Upper Nene Valley Gravel Pits SSSI, Ramsar and Special Protection Area (SPA)? ■ Protect locally designated biodiversity sites from both the direct and indirect adverse effects of development? ■ Safeguard and strengthen local ecological networks both within Northampton Borough and their links with ecological networks in neighbouring districts? ■ Ensure that known biodiversity of brownfield sites is given due weight reflecting its ecological interest and value? ■ Take into account opportunities to enhance biodiversity in the layout and design of development, including allowing species to adapt to climate change? ■ Protect Local Geological Sites from both the direct and indirect adverse effects of development? ■ Improve access to, and understanding of, nature taking into account its sensitivity to human disturbance? 	Biodiversity Flora Fauna
10. Protect and enhance the quality and character of Northampton's landscape and townscape.	<ul style="list-style-type: none"> ■ Protect sensitive landscapes in and around the Borough of Northampton? ■ Conserve and enhance the quality, character and local distinctiveness of Northampton's townscape? ■ Protect and improve Northampton's open spaces and green infrastructure networks? 	Landscape Cultural heritage
11. Conserve and enhance Northampton's historic environment, heritage assets and their settings.	<ul style="list-style-type: none"> ■ Protect, maintain and enhance listed buildings and conservation areas, including their setting? ■ Protect, maintain and enhance scheduled monuments and archaeological sites, and their setting? ■ Protect, maintain and enhance historic parks and gardens, landscapes, and the Registered Battlefield for the Battle of Northampton, and their settings? ■ Protect, maintain and enhance the historic pattern and form of development that characterises Northampton? ■ Protect, maintain and enhance non-designated heritage assets? 	Cultural heritage
12. Minimise air pollution in and around Northampton, particularly in the AQMAs.	<ul style="list-style-type: none"> ■ Avoid increases in traffic emissions in AQMAs? 	Air
13. Encourage sustainable water management.	<ul style="list-style-type: none"> ■ Limit the risk of pollution to the water environment? ■ Conserve water resources? 	Water

SA objectives	Sub questions: Will the policy or proposal...	SEA Regulations topics covered
14. Reduce the risk of flooding to people and property in Northampton.	<ul style="list-style-type: none">■ Reduce the risk of flooding?■ Avoid development within areas of risk of flooding in accordance with Government guidance on flood risk?	Climatic factors Material assets
15. Encourage the efficient use of land in Northampton and protect its soils and mineral resources.	<ul style="list-style-type: none">■ Involve the re-use of previously developed land and buildings?■ Encourage the remediation of contaminated land?■ Avoid the sterilisation of mineral resources?■ Protect the best and most versatile agricultural land?■ Avoid inappropriate of unstable land and, where possible, bring it back into productive use?	Soil Material assets
16. Facilitate sustainable waste management.	<ul style="list-style-type: none">■ Encourage the recovery, re-use and recycling of waste materials?■ Avoid locating sensitive land uses close to waste management facilities?	Material assets

SA of Main Modifications to site allocations

1.18 This section outlines the changes made to allocated sites, to corresponding site-specific site allocation policies, or to the amount of development provided by allocated sites since the Proposed Submission (Round 2) stage and presents the SA findings for these.

Modifications to site allocation boundaries

Residential sites

1.19 Since the Proposed Submission Northampton Local Plan Part 2 was submitted for Examination, WNC has combined residential sites LAA0168, LAA1009 and LAA1142 into LAA1144: Land to the west of Northampton South Sustainable Urban Extension.

1.20 In addition, WNC has made boundary changes to the below listed residential sites. The changes to the boundaries of sites LAA0204, LAA1098 and LAA1113r are not presented in the Schedule of Main Modifications but are instead presented in the Schedule of Changes to the Policies Map.

- LAA1100: Hill Farm Rise;
- LAA0171: Quinton Road;
- LAA0204: The Farm, The Green;
- LAA1098: The Green, Great Houghton; and
- LAA1113r: Greyfriars.

1.21 Table 1.2 presents the 'policy-off' effects identified by the SA of LAA1144 (formerly LAA0168, LAA1009 and LAA1142), in addition to these five sites where the boundary has changed.

1.22 Site LAA1144 is a combination of sites LAA0168, LAA1009 and LAA1142 and therefore the effects this site is likely to have are a combination of the effects previously recorded for these three sites in the June 2020 SA Report (see Table 6.3 in the Regulation 19 (Round 2) stage SA Report).

1.23 The 'policy-off' effects for revised site LAA1100 remain the same as those recorded in the June 2020 SA Report, apart from SA objective 9a: biodiversity and geodiversity. A minor negative 'policy-off' effect is now expected in relation to SA9 as the site no longer overlaps the Wootton Railway Embankment Local Wildlife Site, as a result of the change to the site boundary.

1.24 The effects for site LAA0171 differ from those appraised at Regulation 19 (Round 2) stage as follows:

- A negligible effect is now expected in relation to SA objective 14a: flood risk from rivers because only a small proportion of the site now falls within Flood Zone 2. A minor negative effect was previously recorded.
- A minor negative effect is now expected in relation to SA objective 15b: greenfield land because the site now contains less than 1ha of greenfield land. A significant negative effect was previously recorded.
- A negligible effect is now expected in relation to SA15c: agricultural land because the site now contains less than 1ha of Grade 3 agricultural land. An uncertain significant negative effect was previously recorded.

1.25 The effects for site LAA0204 remain the same as those recorded in the June 2020 SA Report at Regulation 19 (Round 2) stage, apart from SA objective 1a: housing. However, this does not relate to the change in site boundary. A minor positive 'policy-off' effect is now expected in relation to SA1a because the site is delivering 55 instead of 100 new homes. A significant positive effect was previously recorded. It is also important to note that although a significant negative effect is still expected in relation to SA objective 9a: designated sites due to the fact the site falls within 3km of the Upper Nene Valley Gravel Pits SPA and Ramsar site, the site boundary has been amended to exclude the southern corner of the original site which is located on optimal supporting habitat for Golden Plover.

1.26 The effects for site LAA1098 remain the same as those recorded in the June 2020 SA Report and the November 2021 SA Addendum, which was produced to appraise the revised site boundary of The Green, Great Houghton (LAA1098), to include Hardingstone Lodge (LAA1098B). Site LAA1098 incorporating LAA1098B has now been revised to also include Saucerbridge Farm. However, this change in site boundary has not resulted in any changes to the effects previously recorded for this site.

1.27 Two of the effects for site LAA1113r differ from those appraised at Regulation 19 (Round 2) stage, namely:

- SA objective 10a: brownfield land and open space is no longer applicable. A significant negative 'policy-off' effect was previously recorded against SA10a because the site contained an Amenity Green Space. The site boundary has now been amended to not include the Amenity Green Space. Due to the fact the site is below 2.5ha in size (see 'Methodology' chapter of the June 2020 SA Report) and a significant effect is no longer identified, SA10a is no longer applicable.
- A negligible effect is now expected in relation to SA15b: greenfield land because the site no longer contains greenfield land. A minor negative effect was previously recorded.

Employment sites

1.28 Site LAA1113: Greyfriars will deliver a high density mixed-use development. In the June 2020 SA Report, this site was appraised as both a residential (LAA1113r) and employment site (LAA1113c). As mentioned in the previous section, WNC altered the boundary of this site so that it no longer contained the Amenity Green Space. **Table 1.3** presents the 'policy-off' effects identified by the SA of this employment site.

1.29 As was the case with LAA1113r, only two effects differ from those appraised at Regulation 19 (Round 2) stage. Paragraph 1.27 above lists these changes.

1.30 These changes will result in changes to the 'policy-on' appraisal of both sites, allocated by Policy 42: Greyfriars.

Appendix C contains an updated appraisal matrix of Policy 42.

Modifications to site allocation policies

1.31 WNC has also rewritten site-specific allocation Policy 41: The Green, Great Houghton (LAA1098) and produced two new site-specific allocation policies:

- Policy 45: Abington Mill Farm (LAA1107); and
- Policy 46: Hill Farm Rise, Hunsbury Hill (LAA1100).

1.32 **Appendix C** presents the detailed assessments of rewritten Policy 41 and the two new site-specific allocation policies. Sites LAA1107 and LAA1100 were both allocated by Policy 13 of the Proposed Submission Local Plan Part 2 at Regulation 19 (Round 2) stage. That policy contained no site-specific requirements and each site was therefore subject to SA on a 'policy-off' basis only at that time.

1.33 The boundary of sites LAA1100 and LAA1098 have been changed as described in the previous section and a revised GIS-based 'policy-off' appraisal of these sites has now been carried out, as presented in **Table 1.2**. The original 'policy-off' appraisal of site LAA1107³⁴ and the revised 'policy-off' appraisals of sites LAA1100 and LAA1098 provided the starting point for the appraisals of the corresponding site-specific allocation policies that have been rewritten or newly presented by the Main Modifications.

Other modifications to site allocations

1.34 This section considers any changes to the amount of development provided by previously allocated sites and the implications of these for the SA findings.

1.35 Policy 13: Residential and Other Residential Led Allocation lists the residential site allocations – all of which have been individually assessed on a 'policy-off' basis. The capacity of some of these sites has changed since the publication of the Proposed Submission Local Plan Part 2, which has resulted in some changes to the effects previously recorded for these sites. In line with the SA framework, if a site delivers 100 homes or more, a significant positive effect is expected. If a site delivers less than 100 new homes, a minor positive effect is expected. The sites where the change in capacity has resulted in a change in effect against SA objective 1: housing, are as follows:

- Site LAA0288r: Northampton Railway Station Car Park is now likely to have a significant positive effect against SA objective 1a: housing because it will now provide 100 new homes or more. A minor positive effect was previously recorded against SA1a.
- Site LAA1022: Belgrave House is now likely to have a significant positive effect against SA1a because it will now provide 100 new homes or more. A minor positive effect was previously recorded against SA1a.
- Site LAA0204: The Farm, Hardingstone is now likely to have a minor positive effect against SA1a because it will now provide less than 100 new homes. A significant positive effect was previously recorded against SA1a.
- Site LAA1006: Pineham is now likely to have a minor positive effect against SA1a because it will now provide less than 100 new homes. A significant positive effect was previously recorded against SA1a.

SA of Main Modifications to non-site allocation policies

1.36 The implications of Main Modifications other than those to the site allocations dealt with in the preceding section are presented in **Appendix A**. Where the Main Modifications provide a new or substantially rewritten policy, a detailed appraisal matrix for that policy is provided in **Appendix B**.

Reasonable alternatives

1.37 The SEA Regulations require the consideration of reasonable alternatives to the proposed Main Modifications.

1.38 In their post-hearings letter of 24th January 2022, the Inspectors advised that: "a suitable reference should be

³⁴ Reported in Chapter 6 of the Proposed Submission (Round 2) SA Report.

provided in the SA to how and where in the SA process, sites were rejected as being reasonable alternatives and the reasons why they were rejected". This information is as follows:

Rejection of sites not deemed to be reasonable alternatives

In 2016, during the Issues and Options stages of the plan preparation process, over 500 sites were initially assessed for the next stage of the site allocations exercise. Sites which were excluded from the next stage of the site investigation process were sites which were already developed or under construction, as well as sites within designated areas such as the Special Protection Area and the Local Nature Reserves. In 2017, remaining sites were then sent for independent sustainability appraisal assessments. These sites were also assessed by Council officers in detail using the land availability assessment methodology. In 2018, prior to the publication of the first round of the Proposed Submission consultation, further sites were excluded from consideration for proposed allocations for a range of reasons, including the fact that they were still in operational use and there was no evidence to suggest that the operations would cease, there were land ownership issues and there were heritage or open space issues.

1.39 The proposed Main Modifications to the Local Plan Part 2 policies generally do not introduce any major new provisions with the potential to significantly alter the previously reported SA findings for the Proposed Submission Plan. As such, there is no need for the SA to appraise reasonable alternatives to these Main Modifications.

1.40 The Proposed Submission policy 'Supporting and Enhancing Biodiversity' has been split into two separate policies (29A and 29B) but there has been no significant change in meaning between the original policy and the two new policies so there are no new policy provisions or reasonable alternatives to these that require appraisal.

1.41 The proposed Main Modifications add two new site allocation policies – Policy 45: Hill Farm Rise, Hunsbury Hill (LAA1100) and Policy 46: Former Abington Mill Farm, land off Rushmere Road (LAA1107). Both of these sites were already listed as allocations in Policy 13: Residential and Other Residential Led Allocations of the Proposed Submission Plan. Since that policy does not set out any site-specific requirements it was not appraised in its own right by the SA at the Proposed Submission stage. Instead, each site allocated by it was separately appraised on a 'policy-off' basis. This SA Addendum identifies the likely effects of the site-specific requirements set out in the two new allocation policies but there was no need to consider reasonable alternatives to the

development provided as this has not changed since Proposed Submission stage.

1.42 The proposed Main Modifications add site LAA1144 to the list of sites allocated by Policy 13: Residential and Other Residential Led Allocations. This site is made up of three sites (LAA0168, LAA1009 and LAA1142) that have already been separately appraised at Proposed Submission stage on a 'policy-off' basis. As such, there is no significant new provision relative to the Proposed Submission Plan and again, no need to consider whether any new reasonable alternatives to this site require appraisal by the SA at the current stage.

1.43 There have also been some changes at the Main Modifications stage to the boundaries of sites LAA0171, LAA0204, LAA1098 and LAA1113 allocated by Policy 13, of which LAA1113 (LAA1113r and LAA1113c) has its own site-specific allocation policy. The SA already appraised the original boundaries of these sites at Proposed Submission stage on a 'policy-off' basis and this SA Addendum appraises the revised boundaries, also on a 'policy-off' basis. Since the boundary changes do not substantially increase the number of homes provided by the Plan, there is no significant new provision relative to the Proposed Submission Plan and again, no need to consider whether any new reasonable alternatives to these sites require appraisal by the SA at the current stage.

1.44 Site LAA0288 was allocated for the development of 68 dwellings in the submitted Local Plan Part 2, using the standard density set out in the Land Availability Assessment. Following submission of the Local Plan Part 2 in February 2021, a Statement of Common Ground was signed in October 2021 by the landowner, confirming that 280 dwellings could instead be delivered on site LAA0288 during the Plan period. This higher figure was based on more detailed site-specific work undertaken by the promoter, which the Council considered more appropriate than the generic density assumptions. It was concluded that the Local Plan Part 2 should take this revised figure into account and the capacity of the site be amended accordingly.

1.45 The Council gave consideration to some reasonable alternative site options that came to their attention following submission of the Local Plan Part 2. One site, LAA1145, was promoted through the Round 2 Regulation 19 consultation. Another site, LAA0204b, which forms an extension to LAA0204, was excluded from WNC's proposed allocations in error. These two sites have now been appraised and their effects outlined in **Table 1.4**. WNC has not allocated these sites for the following reasons:

- LAA1145: Site adjoins Great Houghton Village. Issues associated with heritage, transport and coalescence. Site not considered suitable for development.

- LAA0204: When the representation for this site was made at the Round 2 Regulation 19 consultation, it was considered too late in the plan-making process to add the wider boundary to the Local Plan Part 2.

1.46 The Main Modifications propose new Policy 17A:

Employment Allocations. However, the allocated sites listed in Policy 17A have already been individually assessed by the SA on a 'policy-off' basis at Proposed Submission stage. Since the new policy does not place any additional requirements on the allocated sites listed in the policy, it does not require further appraisal at Main Modifications stage. This is consistent with the SA of the equivalent policy for residential allocations at Proposed Submission stage. Policy 13: Residential and Other Residential Led Allocations was not appraised because it did not place any additional requirements on the allocated sites listed in the policy, each of which had been subject to 'policy-off' appraisal. Since new Policy 17A does not require appraisal, there is no need to appraise any reasonable alternatives to it.

Table 1.2: SA results for allocated residential sites with revised boundaries

Site ID	Site name	Site area (ha)	Dwelling Capacity	SA1a (Housing)	SA2a (Sustainable transport links)	SA2b (Services and facilities)	SA3a (Schools)	SA4a (Healthcare facilities)	SA4b (Open space and sports facilities)	SA4c (Air quality and noise)	SA5a (Crime)	SA6a (Economy)	SA7a (Town centres)	SA8a (Sustainable transport links)	SA8b (Services and facilities)	SA9a (Designated sites)	SA10a (Brownfield land and open space)	SA11a (Heritage significance)	SA12a (AQMAs)	SA13a (SPZs and contaminated land)	SA14a (Flood risk from rivers)	SA14b (Flood risk from groundwater)	SA14c (Surface water flood risk)	SA15a (Brownfield land)	SA15b (Greenfield land)	SA15c (Agricultural land)	SA15d (Minerals)	SA15e (Land Instability)	SA16a (Waste)
LAA1144	Land to the west of Northampton South Sustainable Urban Extension	18.78	361 ³⁵	++	-	+	-	-	+	-	0	0	0	-	+	-	-	-	-?	0	0	-	0	0	-	--?	0	0	
LAA1100	Hill Farm Rise	4.44	80	+	+	++	++	++	-	++	0	0	0	+	++	-	0	?	-?	0	0	-	0	0	-	--?	0	0	
LAA0171	Quinton Road	0.44	14	+	+	++	-	+	+	0	0	0	0	+	++	-	N/A	-	-?	0	0	0	-	0	+	-	0	0	

³⁵ minimum of 90 dwellings will be provided within the Plan period.

West Northamptonshire Council
Sustainability Appraisal

Main Modifications to the Northampton Local Plan Part 2 June 2022

Table 1.3: SA results for allocated employment sites with revised boundaries

West Northamptonshire Council
Sustainability Appraisal

Main Modifications to the Northampton Local Plan Part 2 June 2022

Site ID	Site name																								
		Site area (ha)																							
LAA1113c	Greyfriars	1.44	0	SA1a (Housing) ++	SA2a (Sustainable transport links) -?	SA3a (Schools) 0	SA4a (Healthcare facilities) -?	SA5a (Crime) 0	SA6a (Economy) ++	SA7a (Town centres) -?	SA8a (Sustainable transport links) ++	SA9a (Designated sites) 0	SA10a (Brownfield land and open space) N/A	SA11a (Heritage significance) -	SA12a (AQMAs) -?	SA13a (SPZs and contaminated land) -?	SA14a (Flood risk from rivers) 0	SA14b (Flood risk from groundwater) 0	SA14c (Surface water flood risk) -	SA15a (Brownfield land) +	SA15b (Greenfield land) 0	SA15c (Agricultural land) 0	SA15d (Minerals) 0	SA15e (Land instability) 0	SA16a (Waste) 0

Table 1.4: SA results for reasonable alternatives

Site ID	Site name	Site area (ha)	Dwelling Capacity	SA1a (Housing)	SA2a (Sustainable transport links)	SA2b (Services and facilities)	SA3a (Schools)	SA4a (Healthcare facilities)	SA4b (Open space and sports facilities)	SA4c (Air quality and noise)	SA5a (Crime)	SA6a (Economy)	SA7a (Town centres)	SA8a (Sustainable transport links)	SA8b (Services and facilities)	SA9a (Designated sites)	SA10a (Brownfield land and open space)	SA11a (Heritage significance)	SA12a (AQMAs)	SA13a (SPZs and contaminated land)	SA14a (Flood risk from rivers)	SA14b (Flood risk from groundwater)	SA14c (Surface water flood risk)	SA15a (Brownfield land)	SA15b (Greenfield land)	SA15c (Agricultural land)	SA15d (Minerals)	SA15e (Land Instability)	SA16a (Waste)
LAA1145	Former Glebe Land at Great Houghton	3.89	30	+	-	+	-	-	+	0	0	0	0	-	+	-	N/A	-	-?	0	0	0	-	0	-	0	-?		
LAA0204b	Additional Land at The Farm	1.71	45	+	+	++	-	-	+	0	0	0	0	+	++	-	-	-	-?	0	0	0	-	0	-	0	-?		

Summary of SA findings

1.47 This SA Addendum has considered the implications for the SA findings reported at Regulation (Round 2) stage of the Main Modifications to the Northampton Local Plan Part 2. The findings for modifications to the site allocations have been described above and in **Appendix C**. Those findings for modifications to other aspects of the Plan have been described in **Appendix A** and **Appendix B**.

1.48 This section summarises where these appraisals have revealed that the proposed Main Modifications would lead to changes in the previously reported SA findings, as follows:

- Site **LAA1100: Hill Farm Rise** is now likely to have a minor negative 'policy-off' effect against SA objective 9a: designated sites because the change to the site boundary results in the site no longer overlapping with the Wootton Railway Embankment Local Wildlife Site. A significant negative effect was previously recorded against SA9a.
- Site **LAA0171: Quinton Road** is now likely to have a 'policy-off' negligible effect in relation to SA objective 14a: flood risk because only a small portion of the site now falls within Flood Zone 2, as a result of the change to the site boundary. A minor negative effect was previously recorded against SA14a. A minor negative 'policy-off' effect is also now expected in relation to SA objective 15b: greenfield land because the site now contains less than 1ha of greenfield land. A significant negative effect was previously recorded against SA15b. Lastly, a negligible 'policy-off' effect is now expected in relation to SA objective 15c: agricultural land because the site now contains less than 1ha of Grade 3 agricultural land. An uncertain significant negative effect was previously recorded.
- Site **LAA0204: The Farm, The Green** is now likely to have a minor positive 'policy-off' effect in relation to SA objective 1: housing because the site is delivering 55 instead of 100 new homes. A significant positive effect was previously recorded.
- Site **LAA1113 (LAA1113r and LAA1113c): Greyfriars** is no longer expected to have a significant negative 'policy-off' effect in relation to SA objective 10a: brownfield land and open space because the site boundary has been changed so that the site no longer contains the Amenity Green Space. A negligible effect is also now expected in relation to SA objective 15b: greenfield land because the site no longer contains greenfield land. A minor negative effect was previously recorded.
- Policy 13: Residential and Other Residential Led Allocations:
 - Site **LAA0288r: Northampton Railway Station Car Park** is now likely to have a significant positive effect against SA objective 1a: housing because it will now provide 100 new homes or more. A minor positive effect was previously recorded against SA1a.
 - Site **LAA1022: Belgrave House** is now likely to have a significant positive effect against SA1a because it will now provide 100 new homes or more. A minor positive effect was previously recorded against SA1a.
 - Site **LAA0204: The Farm, Hardingtonstone** is now likely to have a minor positive effect against SA1a because it will now provide less than 100 new homes. A significant positive effect was previously recorded against SA1a.
 - Site **LAA1006: Pineham** is now likely to have a minor positive effect against SA1a because it will now provide less than 100 new homes. A significant positive effect was previously recorded against SA1a.
 - Site **LAA0171: Quinton Road** is now likely to have a negligible effect against SA14a: flood risk because only a small proportion of the site now falls within Flood Zone 2. A minor negative effect was previously recorded against SA14a. The site is also now likely to have a minor negative effect against SA15b: greenfield land because it now contains less than 1ha of greenfield land. A significant negative effect was previously recorded against SA15b. Lastly, the site is also now likely to have a negligible effect against SA15c: agricultural land because the site now contains less than 1ha of Grade 3 agricultural land. An uncertain significant negative effect was previously recorded against SA15c.
- **Policy 18: Supporting New Employment Developments and Schemes Outside Safeguarded Sites** is now expected to have minor positive effects in relation to SA objectives 9: biodiversity and geodiversity and 11: historic environment because it now requires assessments to be undertaken that give consideration to natural and cultural heritage. Negligible effects were previously recorded against SA9 and SA11.
- **Policy 23: Sports Facilities and Playing Pitches** is now expected to have a minor positive effect against SA objective 4: health and well-being because major developments are no longer required to contribute towards providing sports facilities and playing pitches. A

significant positive effect was previously recorded against SA4.

- **Policy 26: Sites for Burial Space** is now expected to have a minor positive effect (as part of a mixed effect) against SA objective 9: biodiversity and geodiversity because there is now a requirement for a net gain in biodiversity.
- **Policy 30: Upper Nene Valley Gravel Pits Special Protection Area** is now expected to have a minor positive effect against SA objective 13: water management because there is now a requirement for major developments to demonstrate that there is sufficient capacity at the receiving Water Recycling Centre to ensure water quality is protected.
- **Policy 41: The Green, Great Houghton (LAA1098)** has been rewritten and is now expected to have significant positive effects (as part of a mixed effect) in relation to SA objective 4: health and well-being because the policy now seeks to secure a Suitable Alternative Natural Greenspace (SANG). Additionally, minor negative effects are now expected in relation to SA objective 9: biodiversity and geodiversity as a result of the mitigation proposed within the policy. A significant negative effect was previously recorded against SA9. Minor positive effects are also now expected in relation to SA objectives 13: SPZs and contaminated land and 14: flood risk because development is required to maximise the use of Sustainable Drainage Systems, which can help mitigate surface water runoff at the same time as protecting water quality.
- **Policy 42: Greyfriars (LAA1113)** comprises sites LAA1113r (residential) and LAA1113c (employment), both of which were appraised in the June 2020 SA Report. The site boundary has been changed and therefore a new 'policy-off' appraisal of both sites was undertaken. This resulted in some changes to the effects previously recorded, which then also altered the 'policy-on' appraisal of Policy 42. This policy is now expected to have significant positive effects in relation to SA objective 10: landscapes and townscapes instead of mixed significant positive and significant negative effects. This is because the Lady's Land Amenity Green Space will no longer be lost to development. Minor positive effects are also now expected in relation to SA objective 15: soils and minerals because the site no longer contains greenfield land in the form of amenity green space.
- **Policy 44: Sites in Tanner Street, Green Street, St Peter's Way and Freeschool Street (LAA0167/0818/0931/1010)** is now expected to have a minor negative effect against SA objective 14: flood risk

because maximising the use of Sustainable Drainage Systems (SuDS) will help mitigate against flood risk. A significant negative effect was previously recorded against SA14.

Summary of Habitats Regulations Assessment findings

1.49 The Habitats Regulations Assessment (HRA) for the Northampton Local Plan Part 2 is being undertaken by LUC on behalf of the Council. While the HRA is being reported on separately to the SA, the findings have been taken into account in the SA where relevant. The HRA screening assessment identified the need for Appropriate Assessment of the Northampton Local Plan Part 2, as likely significant effects could not be ruled out on Rutland Water SPA and Ramsar site or Upper Nene Valley Gravel Pits SPA and Ramsar site. The Appropriate Assessment concluded that the Northampton Local Plan Part 2 will not result in adverse effects on the integrity of any European site provided that recommended policy safeguards are included before the plan is adopted.

1.50 The HRA of the proposed Main Modifications concludes that there will be no significant changes to the previous findings of the HRA. This is due to the fact the changes within the proposed Main Modifications reflect discussions set out in the Statements of Common Ground and discussions with Natural England, which strengthen the safeguards that were previously set out in the policies.

Cumulative effects

1.51 Table 7.2 in the June 2020 SA Report for the Proposed Submission Regulation 19 (Round 2) Local Plan sets out the potential for cumulative effects with other development planned in neighbouring boroughs and districts, as well as county-wide initiatives such as transport infrastructure projects and mineral and waste development within and adjacent to the Northampton plan area. Since the publication of the Proposed Submission Local Plan Part 2, there have been no changes to these proposals and therefore the in-combination effects remain the same.

1.52 This SA of the proposed Main Modifications has identified changes to the sustainability effects of a small number of policies or site allocations, as summarised at paragraph 1.48 above. However, these changes would not change the overall cumulative effect of the Proposed Submission Northampton Local Plan Part 2 in relation to each SA objective, as recorded in Chapter 7 of the June 2020 SA Report.

Monitoring indicators

1.53 The proposed monitoring indicators for monitoring the effects of the Northampton Local Plan Part 2 in the SA Report, which accompanied the Proposed Submission Local Plan Part 2 (Round 2) published in June 2020, remain unchanged.

Appendix A

Schedule of Main Modifications with SA implications

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>		
Note 1		In the final version of the plan, every paragraph in a policy which has more than one paragraph will be given a letter, and each bullet pointed criterion will be given a roman numeral. As these changes are presentational only, they do not formally form part of these modifications.	N/A	No change to SA findings: This does not form part of the proposed modifications and will not alter the findings of the SA as it is a presentational change.
		Chapter 1 : Introduction and Policy Context		
MM1	New paragraph following paragraph 1.5	The Development plan should be read as a whole, including this Local Plan Part 2, the West Northamptonshire Joint Core Strategy, “made” Neighbourhood Plans and any documents that subsequently become part of the development plan. Planning applications will be determined having regard to the development plan and other material considerations. The policies in this Plan are strategic policies for the purpose of the Basic Conditions for neighbourhood plans.	To ensure that the Plan is sound by being clear about its status and clear in terms of the basic conditions for neighbourhood plans	No change to SA findings: This proposed Main Modification will not alter the findings of the SA as it provides further information on the Development Plan.
		Chapter 5: Quality of New Development		
MM2	Paras 5.1, 5.5 and 5.7 and Policies 2 and 3	<p>Paragraph 5.1, add the following after 6th sentence: <u>These facilities should be designed in a manner which will be easily accessible by the local population by walking and cycling or by using public transport.</u></p> <p>Amend paragraph 5.5 to read as follows: All development should be well designed and of high quality, meeting urban design principles outlined in the Design Companion for Planning and Placemaking¹⁵, and <u>Active Design, the National Design Guide¹⁶ and the National Model Design Code</u>. The Council also believes that meeting Building for a <u>Healthy Life</u> criteria helps achieve urban design principles. Building for a <u>Healthy Life</u> (BfHL) is a national standard for well-designed homes and neighbourhoods. <u>There are 12 considerations or criteria which need to be taken into account in the areas of design and placemaking. The 12 considerations include elements such as natural connections, well defined streets and spaces, and green infrastructure. To be eligible for a Building for a Healthy Life commendation, a development needs to secure at least 9 green lights out of the 12 considerations and no red lights</u>). The Council supports <u>the use of this guidance to help structure pre-</u></p>	To explain how 2 nd bullet point of Policy 2 can be delivered. To reflect the updated National Planning Policy Framework (July 2021).	No change to SA findings/policy removed: The first element of this proposed Main Modification will not alter the findings of the SA because although Policy 2: Placemaking and Design and its supporting text have been refined and updated to refer to active transport and Building for a Healthy Life, the actual purpose of Policy 2 remains the same in that it seeks to create high quality places in which to live and work. With regard to the removal of Policy 3, this will alter the findings of the SA because the effects recorded for that policy will no longer occur.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>application discussions with applicants.BfL, or a successor standard as well as other relevant guidance, including the Design Companion for Planning and Placemaking, National Design Guide and Active Design to help structure pre-application discussions between local communities, the Council and the developer of the proposed scheme.</p> <p>Amend Policy 2, to read as follows:</p> <p>POLICY 2 <u>PLACEMAKING AND DESIGN</u></p> <p>A. Development should be designed to promote and contribute to good placemaking through high quality, <u>innovative</u> <u>beautiful</u> and sustainable design which encourages the creation of a strong, locally distinctive sense of place by:</p> <ul style="list-style-type: none">i. Being well designed for the intended use(s), attractive and adaptable to future requirements <u>throughout its life</u>.ii. Incorporating a mix of easily accessible facilities for day to day living and that enables enabling community interaction and cohesion, or <u>by providing easy and inclusive access to those facilities nearby</u>iii. Creating healthy environments that prioritise people walking and cycling to reach local facilities and facilitate recreationiv. Responding to and enhancing locally distinct townscape, landscape and historic environment characteristicsv. Retaining, enhancing and creating important views and vistas into, out of and through the site responding to topography and landform where such opportunities arisevi. Sustaining, protecting and enhancing heritage and natural environment assets, including non-designated assets and settings and those included on Local Lists as well as those already statutorily protected. Additionally, future development must not leave these assets vulnerable to risk and, wherever possible, should promote the use,	To reflect the publication of revised and retitled guidance. Consequential change to policy.	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>understanding and enjoyment of the historic and natural environments as an integral part of good placemaking</p> <p>vii. Having regard to safeguarding or enhancing the setting of locally distinct places, including those found in Conservation Area Appraisals, in terms of scale, design, landform and integration within the existing local context to protect their identified important and unique characteristics based on sound, consistent analysis</p> <p>viii Including <u>attractive, safe and inclusive</u> high quality public realm for streets and public spaces incorporating features such as public art as an opportunity to reinforce and enhance legibility, character and local distinctiveness</p> <p>ix. Incorporating mixed-use buildings, taking amenity into account</p> <p>x. Ensuring plans for long-term maintenance are in place</p> <p>Add the following wording after the final bullet point:</p> <p><u>B.</u> To assist in the achievement of good placemaking, new developments should be designed to:</p> <p>Incorporate sustainable design at the beginning of the development process</p> <p>Ensure safety, security, amenity, accessibility and adaptability</p> <p>i. Have full regard to the needs for security and crime prevention, with crime prevention measures incorporated into the site layout and building design</p> <p>ii. Ensure residents' privacy and adequate levels of sunlight and daylight</p> <p>Be as sustainable as possible and constructed in a sustainable fashion</p> <p><u>iii. Incorporate Design Coding (in the case of major developments) to ensure consistency of design approach</u></p> <p>iv. Ensure that buildings are designed to be resilient in the future taking into account the impacts of climate change</p>	<p>This point is adequately covered in Policy 5</p> <p>This point is adequately covered elsewhere in the policy</p>	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>v. Ensure that buildings' form, massing and façades create character and visual interest</p> <p>vi. Use high quality and durable materials</p> <p>vii. Include windows and active frontages overlooking the public realm</p> <p>viii. Use passive design principles where appropriate</p> <p>ix. 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> <p>x. Incorporate green roofs and living walls into the building design where possible</p> <p>xi. Ensure that public, open or green spaces are overlooked by houses to ensure that they are safe spaces; and</p> <p>Achieve Building for Life certification</p> <p>xii. <u>Ensure that new streets are tree lined unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate.</u></p> <p>Opportunities for the provision of street trees and soft landscaping should be taken and subject to the other criteria of this policy.</p> <p>C. For proposals for major development, a Building for a Healthy Life assessment, or an assessment against equivalent criteria, should be included in the Design and Access Statement to demonstrate that the proposal is capable of achieving a Building for a Healthy Life commendation, or an equivalent standard.</p> <p>D. Small scale developments (for 10 dwellings or fewer) 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 and take the available opportunities to enhance their surroundings.</p>	This is not considered to add any additional value to the policy.	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<p>5.7 To complement the placemaking policy, it is necessary to have detailed design criteria as set out in policy 3.</p> <p><u>Delete Policy 3</u></p> <p><u>POLICY 3</u></p> <p><u>DESIGN</u></p> <p>To assist in the achievement of good placemaking, new developments should be designed to:</p> <ul style="list-style-type: none">● Incorporate sustainable design at the beginning of the development process● Ensure safety, security, amenity, accessibility and adaptability● Have full regard to the needs for security and crime prevention, with crime prevention measures incorporated into the site layout and building design● Ensure residents' privacy and adequate levels of sunlight and daylight● Be as sustainable as possible and constructed in a sustainable fashion● Incorporate Design Coding (in the case of major developments) to ensure consistency of design approach● Ensure that buildings are designed to be resilient in the future taking into account the impacts of climate change	<p>To update the policy to refer to Building for a Healthy Life</p> <p>To ensure conformity with government guidance</p>	<p>To update the policy to refer to Building for a Healthy Life</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<ul style="list-style-type: none">• Ensure that buildings' form, massing and façades create character and visual interest• Use high quality and durable materials• Include windows and active frontages overlooking the public realm• Use passive design principles where appropriate• 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• Incorporate green roofs and living walls into the building design where possible• Ensure that public, open or green spaces are overlooked by houses to ensure that they are safe spaces; and• Achieve the Building for Healthy Life certification <p>Opportunities for the provision of street trees and soft landscaping should be taken and subject to the other criteria of this policy.</p> <p>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>	Paragraph 5.7 is superfluous with the modifications. To policies 2 and 3.	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
MM3	Paragraph 5.9 and Policy 4	Delete Paragraph 5.9: When converting a property into a house in multiple occupation, the landlord/ property owner must provide acceptable standards, for example, for room sizes, lighting and internal layout. In addition, internal space standards within new dwellings play an important part in ensuring that the resident's quality of life and wellbeing are appropriately considered. Space standards are intended to ensure that new dwellings provide a reasonable level of internal space to undertake day to day activities at a given level of occupancy. The Nationally Described Space Standard (NDSS) deals with internal space within new dwellings and is suitable for application across all tenures. 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. Policy 4, delete 5 th bullet point: <ul style="list-style-type: none"> • Provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards, or successor guidance Policy 4, amend 7 th bullet point: <ul style="list-style-type: none"> • That large<u>all</u> developments.... 	To accord with tests of soundness set out in the National Planning Policy Framework. To accord with tests of soundness as set out in the National Planning Policy Framework. To clarify that all developments need to incorporate high-quality public realm	No change to SA findings: This proposed Main Modification will not alter the findings of the SA because the Nationally Described Space Standards form part of the baseline. The removal of reference to the Nationally Described Space Standards will therefore not change any of the effects already recorded for Policy 4: Amenity and Layout against each of the SA objectives.
MM4	Paragraph 5.17 and Policy 5	Paragraph 5.17, amend as follows: It is increasingly recognised that one of the most important factors in delivering a successful development scheme is ensuring that sustainability is integrated into the design from the outset. This tends to lead to better design and lower lifetime cost, as options are greater at an early stage and there is more scope to identify options that achieve multiple aims. For this reason, Policy 5 requires that, for all major developments, a Sustainability Statement is included as part of the Design and Access Statement for submission with the planning application. A Sustainability Statement may also include Embodied Carbon Construction Calculations and whole-life costing in design and procurement processes. Sustainable design and construction takes into	To provide a mechanism by which it can be demonstrated that proposals for new buildings and the refurbishment of existing building stock have adopted sustainable	No change to SA findings: This proposed Main Modification will not alter the findings of the SA because it clarifies what will be included within the Sustainability Statement. The appraisal of Policy 5: Carbon Reduction, Community Energy Networks, Sustainable Design and Construction, and Water Use already records a significant positive

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>		
		account the resources used in construction, the environmental, social and economic impacts of the construction process and how buildings are designed and used.	construction methods.	effect in relation to SA objective 8: climate change mitigation.
MM5	Paragraphs 5.28, 5.29 and Policy 6	<p>Paragraph 5.28, amend as follows:</p> <p>Planning 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: The design of new developments can have an impact on the community's health and wellbeing, through the shaping of the local environment and influencing the lives of the existing and future residents. It is therefore important to ensure that major development proposals include assessments on the impacts of the schemes on the health and wellbeing of the community. One way in which this can be achieved is through a health impact assessment on major development proposals. The applicant should demonstrate how the scheme promotes the provisions outlined below, and how these would benefit existing and future residents in terms of the impacts on their health and wellbeing. Good design can do this through:</p> <p>Paragraph 5.29, amend as follows:</p> <p>Health impact assessments enable the identification and assessment of the likely effects that a proposed development will have on the health and wellbeing of the community. By using this, positive health and wellbeing impacts can be maximised and negative health and wellbeing impacts can be avoided and minimised. In order that Health Impact Assessments are proportionate to the scale of a scheme, and hence its potential impacts, with with its partners, the Council has developed a Rapid Health Impact Assessment tool for assessing the likely health impacts of development proposals to be used as they are being developed of up to 100 dwellings. It has been designed in such a way as to help meet the objectives of local strategies and plans to improve health and wellbeing including the Northamptonshire Joint Health and Wellbeing Strategy. Development proposals for 100 or more dwellings will be</p>	To clarify that HIAs are needed for all major development.	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although Policy 6: Health and Wellbeing and its supporting text have been updated to provide further information on Health Impact Assessments, with reference to Building for a Healthy Life, the actual purpose of the policy remains the same in that it ensures design principles are encapsulated into any proposals that come forward. With regard to the removal of the last paragraph in Policy 6, the requirement for developments of 100 dwellings or more to undertake a full Health Impact Assessment is contained within the supporting text to the policy.</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>expected to include a more substantial health impact assessment to support their application. <u>Applicants for major development schemes of up to 100 dwellings are strongly encouraged to use this tool to support their proposals and demonstrate compliance with policy 6.</u> Applicants for developments over 100 dwellings will need to complete a full Health Impact Assessment.</p> <p>Policy 6, amend 1st paragraph: The health and wellbeing of communities will be maintained and improved by requiring <u>major development to demonstrate, through an appropriate health impact assessment, that it will contribute to creating an age friendly, healthy and equitable living environment through:</u></p> <p>5th bullet point, amend: v. Promoting access for all to green spaces, sports facilities, play and recreation opportunities in accordance with the <u>Standards set out in this plan and the Open Space, Sport and Recreation Strategy standards set out in Policy 28 of this Plan;</u> and</p> <p>Add new 6th bullet point: vi. <u>Use of design tools such as Building for a Healthy Life (BfHL)</u></p> <p>Second paragraph, amend as follows: The Council will support the provision of health facilities to accommodate primary and secondary needs in <u>sustainable accessible locations</u> which contribute towards health and wellbeing.</p> <p>Third paragraph, delete:</p>	<p>To clarify that criterion 5 relates to policy 28.</p> <p>To strengthen the position in relation to the Building for a Healthy Life guidelines</p> <p>To aid clarity.</p> <p>This paragraph is superfluous.</p>	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		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 complete a more substantial health impact assessment to support their application.		
MM6	Paragraphs 5.32 and 5.34 and Policy 7	Amend paragraph 5.32 as follows: It is not possible to eliminate all the risk of flooding. The Northamptonshire Local Flood Risk Management Strategy produced by the LLFA, sets out a framework of measures to manage local flood risk. The strategy sets out a collaborative approach to reducing flood risk within Northamptonshire. In addition, within the Upper Nene Catchment for surface water drainage, there is a need to incorporate a 1 in 200 year standard with an additional allowance for climate change to protect against pluvial flooding. The design standard for the Upper Nene Catchment (through Northampton and within the Nene catchment upstream of Northampton) is the 0.5% probability (1 in 200 chance of occurring in any given year) event plus climate change. Surface water attenuation should be provided up to this standard. Amend paragraph 5.34 to read as follows: 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. Anglian Water's SUDs Adoption handbook <u>and the water sector Design and Construction Guidance</u> sets out the circumstances in which SUDs features would be adopted by Anglian Water. Add new paragraph between paragraph 5.34 and Policy 7 to read as follows:	To reflect consultation responses made by Anglian Water and to reflect comments made by the Environment Agency in their Written Statement. To strengthen the policy and to emphasise that this must be complied	More sustainable (no change to effects score): This proposed Main Modification will not alter the findings of the SA because although the supporting text and first paragraph of Policy 7: Flood Risk and Water Management have been reworded, the meaning of the policy remains the same. However, the additional text on surface water attenuation for the Upper Nene Catchment will result in Policy 7 contributing more greatly towards the significant positive effect already recorded against SA objectives 13: water management and 14: flood risk.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>5.35 SUDS should be multi-use rather than set aside solely for the purpose of water storage. Building for a Healthy Life states that well designed multi-functional sustainable drainage may incorporate play and recreational opportunities.</p> <p>Amend Policy 7 as follows: Policy 7, replace 1st para 'Proposals.....supported.' with:</p> <p>Proposals that:</p> <ul style="list-style-type: none">● assist in the management of flood risk and ensure flood risk is not increased elsewhere and provide flood risk reduction/ betterment; and● 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 documents) <p>will be supported.</p> <p>All proposals must demonstrate that they will assist in the management of flood risk, ensure flood risk is not increased elsewhere and provide flood risk reduction/ betterment. Proposals must have regard to relevant guidance for flood risk management and standards for surface water produced by the Lead Local Flood Authority and Anglian Water (or successor documents).</p> <p>Delete 'major' from last paragraph: For all major development: Add the following paragraph at the end: <u>C. Surface water attenuation should be provided to the design standard for the Upper Nene Catchment (through Northampton and within the Nene catchment upstream of</u></p>	<p>with. The replacement wording emphasises that this is policy requirement rather than being optional, which is important to ensure that water and flooding matters are addressed.</p> <p>Policy should be applicable to all development and not just major development.</p>	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>		
		Northampton) i.e. a 0.5% probability (1 in 200 chance of occurring in any given year) <u>event plus climate change.</u>		
		Chapter 6: Northampton Regeneration Strategy		
MM7	Policy 9	<p>2nd bullet point: ii. Four Waterside – <u>any proposals should conform to Policy 44 of this plan</u></p> <p>3rd bullet point: iii. St Peters Way – to the south of the roundabout - <u>any proposals should conform to Policy 44 of this plan.</u></p>	To provide clarity	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because it incorporates a minor wording clarification regarding St Peter's Way. With regard to the reference to Policy 44 (Sites in Tanner Street, Green Street, St Peter's Way and Freeschool Street), the SA appraises Policy 9: Regeneration Opportunities in the Central Area on its own merits and only considers all of the policies together in the cumulative effects section of the SA.</p>
MM8	Policy 11	<p>Replace 2nd paragraph as follows: <u>Hotel proposals in other parts of the plan area will be the subject of the sequential test.</u> Developments for hotels in any other locations which apply the sequential test and demonstrate that the scheme will attract new leisure and business tourism demand without substantially undermining the potential for new hotels to be delivered in the town centre and in the Enterprise Zone will also be supported.</p>	To ensure consistency with the National Planning Policy Framework (July 2021).	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although the sentence has been reworded, its meaning remains the same.</p>
MM9	Policy 12	Amend 1 st sentence as follows: ..town centre, and the Central Area.	To conform to the National Planning Policy Framework.	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>		it is a minor wording clarification relating to the town centre.
MM10	New para 6.28 and Policy 12	<p>Add new paragraph 6.28:</p> <p><u>Policy N2 of the West Northamptonshire Joint Core Strategy focuses on the Northampton town centre boundary, the Primary Shopping Area and the Central Area (CA). It states that major office, leisure and cultural development will take place in the CA and retail will be accommodated in the town centre primarily through the redevelopment of the Grosvenor Centre and town centre sites, followed by other sites in the CA. It also makes provision in the CA for a net increase of a minimum of 37,000 sq.m net of comparison shopping to 2026; around 3,000 sq.m of convenience shopping to 2026; and office development around 100,000 sq.m. This policy has now been superseded by Policies 12 and Policy 19 of this Local Plan because:</u></p> <ul style="list-style-type: none"> <u>Policy 12 supports main town centre uses in the town centre. Evidence shows that the role of the town centre is changing and more emphasis should be given to promoting main town centre uses within the town centre boundary. The reference to the Central Area therefore is no longer relevant for main town centre uses</u> <u>Policy 19 (Chapter 9) supports the provision of about 8,900sq.m net of convenience retail floorspace, and about 7,300 sq.m of comparison floorspace by 2029. The revised provision is based on updated technical evidence base.</u> <p>Delivering WNJCS: Policy N2 (Northampton Central Area)</p>	To provide an explanation as to how Policies 12 and 19 supersede Policy N2 of the West Northamptonshire Joint Core Strategy.	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because it outlines how Policies 12: Development of Main Town Centre Uses and 19: New Retail Developments and Retail Impact Assessment, which have been subject to SA, supersede Policy N2: Northampton Central Area in the West Northamptonshire Joint Core Strategy (2014).</p>
		Chapter 7: Residential		

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
MM11	Policy 13	<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>Amend paragraphs 7.1 to 7.11, Graph 1, Table 6, Table 7 and Graph 2 to read as follows:</p> <p>7.1 The West Northamptonshire Joint Core Strategy (JCS) established an objectively assessed need of 25,758 dwellings for Northampton between 2011 and 2029. <u>JCS</u> Policy S3 sets the housing requirement for Northampton Borough from 2011 to 2029 at about 18,870 dwellings. 7073 of these dwellings (37%) are set to be provided in the Sustainable Urban Extensions (SUEs) allocated in the JCS. By 1st April 2019–2021, 5,727 <u>6,957</u> dwellings had been delivered, against a JCS requirement to allocate sufficient sites (allowing for windfall) to accommodate 8,157 <u>11,236</u> new dwellings in Northampton by that time. The number of dwellings delivered by 1st April 2019–2021 falls some 2,430 <u>4,279</u> units short of the delivery trajectory^[1] set out in the JCS (see Table 6).</p> <p>7.2 The profile of the JCS delivery trajectory was heavily influenced by economic conditions and intelligence at the time it was being progressed. The trajectory envisaged that between 2014/15 and 2023/24, an annual completion rate of over 1,000 dwellings (peaking at 1,588 in 2019/20) was deliverable. This has not materialised. This is mainly because delivery of new dwellings at the SUEs has been relatively slow. Therefore, it is now expected that not all of the dwellings to be delivered by the SUEs, will be completed before 1st April 2029. <u>Table 6 below shows the housing commitments for the SUEs.</u> Graph 1 illustrates this persistent under-delivery against the JCS proposed housing delivery trajectory. <u>Table 6 below shows the housing commitments for the SUEs.</u> The <u>JCS assumed that all of the SUEs would be fully built out by 1st April 2029,</u> but Table 6 shows that around 2,624 dwellings will are likely to be delivered after that date.</p>	<p>This change is proposed to make the Plan Effective, and updates the data on the delivery of housing and the housing trajectory for the plan period</p>	<p>Mixed sustainability implications (effects score changed): This proposed Main Modification will alter the findings of the SA as a result of the changes to Appendix 1, as referenced by this Main Modification.</p> <p>In line with the assessment criteria for residential sites, if a site accommodates 100 dwellings or more, significant positive effects are expected in relation to SA objective 1: housing. If a site accommodates less than 100 dwellings, minor positive effects are expected in relation to SA1.</p> <p>The following two sites were previously recorded as providing less than 100 dwellings and therefore received a minor positive effect against SA1. These two sites are now expected to provide 100 dwellings or more and therefore receive a significant positive effect against SA1:</p> <ul style="list-style-type: none"> • LAA0288r: Northampton Railway Station Car Park; and • LAA1022: Belgrave House.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings																																																																												
		<p style="text-align: center;">Graph 1:</p> <p style="text-align: center;">Housing delivery in Northampton against the Joint Core Strategy proposed housing delivery trajectory</p>  <table border="1"> <caption>Data extracted from Graph 1: Actual Completions (2011-2021) & Projected Completions (2021-29) against JCS Target</caption> <thead> <tr> <th>Year</th> <th>Actual Completions (2011-2021)</th> <th>Projected Completions (2021-29)</th> <th>Core Strategy Target</th> </tr> </thead> <tbody> <tr><td>2011-12</td><td>~400</td><td>-</td><td>-</td></tr> <tr><td>2012-13</td><td>~500</td><td>-</td><td>-</td></tr> <tr><td>2013-14</td><td>~800</td><td>-</td><td>-</td></tr> <tr><td>2014-15</td><td>~1000</td><td>-</td><td>-</td></tr> <tr><td>2015-16</td><td>~700</td><td>-</td><td>-</td></tr> <tr><td>2016-17</td><td>~800</td><td>-</td><td>-</td></tr> <tr><td>2017-18</td><td>~800</td><td>-</td><td>-</td></tr> <tr><td>2018-19</td><td>~500</td><td>-</td><td>-</td></tr> <tr><td>2019-20</td><td>~500</td><td>-</td><td>-</td></tr> <tr><td>2020-21</td><td>~600</td><td>-</td><td>-</td></tr> <tr><td>2021-22</td><td>-</td><td>~1100</td><td>~1500</td></tr> <tr><td>2022-23</td><td>-</td><td>~1300</td><td>~1300</td></tr> <tr><td>2023-24</td><td>-</td><td>~2000</td><td>~1200</td></tr> <tr><td>2024-25</td><td>-</td><td>~2000</td><td>~900</td></tr> <tr><td>2025-26</td><td>-</td><td>~1800</td><td>~800</td></tr> <tr><td>2026-27</td><td>-</td><td>~1500</td><td>~700</td></tr> <tr><td>2027-28</td><td>-</td><td>~1400</td><td>~600</td></tr> <tr><td>2028-29</td><td>-</td><td>~1200</td><td>~600</td></tr> </tbody> </table> <p>7.3 Northampton's Five Year Housing Land Supply Assessment for April 2019 shows that Northampton has under-delivered against the JCS target over the last five years.^[1] It was anticipated that, to accord with the NPPF, a buffer of 20% would have needed to be added to the supply of deliverable sites. However, in 2018, the Ministry of Housing, Communities and Local Government introduced a new methodology for measuring housing delivery.^[2] The first two Housing Delivery Tests concluded that</p>	Year	Actual Completions (2011-2021)	Projected Completions (2021-29)	Core Strategy Target	2011-12	~400	-	-	2012-13	~500	-	-	2013-14	~800	-	-	2014-15	~1000	-	-	2015-16	~700	-	-	2016-17	~800	-	-	2017-18	~800	-	-	2018-19	~500	-	-	2019-20	~500	-	-	2020-21	~600	-	-	2021-22	-	~1100	~1500	2022-23	-	~1300	~1300	2023-24	-	~2000	~1200	2024-25	-	~2000	~900	2025-26	-	~1800	~800	2026-27	-	~1500	~700	2027-28	-	~1400	~600	2028-29	-	~1200	~600		<p>Residential site LAA0288r is allocated alongside employment site LAA0288c and residential site LAA0333, under Policy 39: Northampton Railway Station, Railfreight and Adjoining Sites. Policy 39 is already recorded as having a significant positive effect against SA1 because when the Proposed Submission Local Plan Part 2 was submitted for Examination, this policy already sought to deliver over 100 dwellings via a combination of both LAA0288 and LAA0333.</p> <p>The following two sites were previously recorded as providing 100 dwellings or more and therefore received a significant positive effect against SA1. These two sites are now expected to provide less than 100 dwellings and therefore receive a minor positive effect against SA1:</p> <ul style="list-style-type: none"> • LAA0204: The Farm, Hardingstone; and • LAA1006: Pineham. <p>A number of allocations have been removed from the Local Plan Part 2 due to a number of reasons, as set</p>
Year	Actual Completions (2011-2021)	Projected Completions (2021-29)	Core Strategy Target																																																																													
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Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings																		
		<p>Northampton Borough passed and therefore only needed a 5% buffer for the first 5 years.^[2] An assessment of Northampton's five year housing land supply also confirmed that windfall sites of under 200 dwellings have the capacity to generate in the region of 300 dwellings per annum. This is a figure that has consistently been delivered over the last 10 years. It is anticipated that this trend will continue, and potentially increase, in the short to medium term due to Government changes to permitted development rights (which include flexibility for changes of use from employment and other commercial uses to residential).</p> <p style="text-align: center;">Table 6.7: Housing commitments (including Joint Core Strategy allocations), proposed allocations and windfall</p> <table border="1" data-bbox="552 870 1327 1103"> <thead> <tr> <th></th><th>JCS requirement <u>2011-2019/2021</u></th><th>Net completions <u>2011-19/2021</u></th><th>Delivery of dwellings compared to JCS requirement</th></tr> </thead> <tbody> <tr> <td>Total dwellings</td><td>815,711,236</td><td>5,727,6,957</td><td>-2430 -4,279</td></tr> </tbody> </table> <table border="1" data-bbox="552 1135 1349 1389"> <thead> <tr> <th>Site name</th><th>Status as at <u>1st April 2019/2021</u></th><th>Dwellings completed as at 1st April <u>2019/2021</u></th><th>Remaining capacity to 1st April 2029</th><th>Remaining capacity forecast to be delivered after 1st April 2029</th></tr> </thead> <tbody> <tr> <td>N5 (Northampt</td><td>Under construction.</td><td>0</td><td>6361,000</td><td>3640</td></tr> </tbody> </table>		JCS requirement <u>2011-2019/2021</u>	Net completions <u>2011-19/2021</u>	Delivery of dwellings compared to JCS requirement	Total dwellings	815,711,236	5,727,6,957	-2430 -4,279	Site name	Status as at <u>1st April 2019/2021</u>	Dwellings completed as at 1 st April <u>2019/2021</u>	Remaining capacity to 1 st April 2029	Remaining capacity forecast to be delivered after 1 st April 2029	N5 (Northampt	Under construction.	0	6361,000	3640		<p>out below. The removal of these site allocations from the Proposed Submission Local Plan Part 2 will alter the findings of the SA because the effects previously recorded for those allocations will no longer occur.</p> <ul style="list-style-type: none"> • LAA0168: Rowtree Road – combined to form LAA1144; • LAA0197: Hunsbury School, Hunsbury Fill – completed; • LAA0205: Parklands Middle School, Devon Way – removed as currently an Amenity Green Space typology and site is currently under construction; • LAA0336: Chronicle and Echo South (rear of Aldi) – completed; • LAA0403: Allotments Studland Road – currently an Allotment typology; • LAA0657: Fraser Road – currently an Amenity Green Space typology; • LAA0685: Adj 12 Pennycress Place, Ecton Brook Road – currently an
	JCS requirement <u>2011-2019/2021</u>	Net completions <u>2011-19/2021</u>	Delivery of dwellings compared to JCS requirement																			
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Reference	Policy/ Paragraph	Suggested Modification to Policy Wording					Reason for modification	Implications for the SA findings
		Wording to be deleted is struckthrough New wording is <u>underlined</u>						
		on South SUE	N/2013/1035 (outline permission) and <u>N/2017/1566</u> . Reserved matters for phase 1 – 349 dwellings approved					Amenity Green Space typology; <ul style="list-style-type: none"> LAA1009: Land west of Policy N5 Northampton South SUE (site 1) – combined to form LAA1144; LAA1037: Swale Drive garage site and rear/ unused land – completed; LAA1041: Newnham Road, Kingsthorpe – currently an Amenity Green Space typology; LAA1051a: Land between Waterpump Court and Billing Brook Road – completed; LAA1058: Land off Oat Hill Drive, Ecton Brook – currently an Amenity Green Space typology; LAA1060: Hayeswood Road, Lings – currently an Amenity Green Space typology and site is currently under construction; LAA1094: Land off Holmecross Road – currently an Amenity Green Space typology;
		N6 (Northampton South of Brackmills)	Under construction. N/2013/0338, <u>N/2017/1369</u> and <u>N/2019/0048</u>	0	1115911	<u>0204</u>		
		N7 (Northampton Kings Heath SUE – Dallington Grange)	Not implemented. N/2014/1929 (live application)	0	2000950	<u>10002,050</u>		
		N9 (Northampton Upton Park SUE)	N/2011/0997 (outline approval for up to 1,000 dwellings) N/2018/0426 (reserved)	04	861856	0		

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording						Reason for modification	Implications for the SA findings	
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>								
			matters in progress for 860 dwellings)							
N9A (Northampton Upton Lodge SUE)		N/2017/0091 (live application for 1,400 dwellings) <u>N/2018/0074</u>	<u>933</u>	<u>13471,115</u>	<u>53370</u>					
		Completions	Existing commitments (as of 1st April 2019)	Windfall allowance	Sustainable Urban Extensions	LP2 Allocations	Total Delivery	Plan Target		
		5728	4377	2,400	5959	3,804	22,267	18,873		
Difference between Plan Target and Total Delivery										

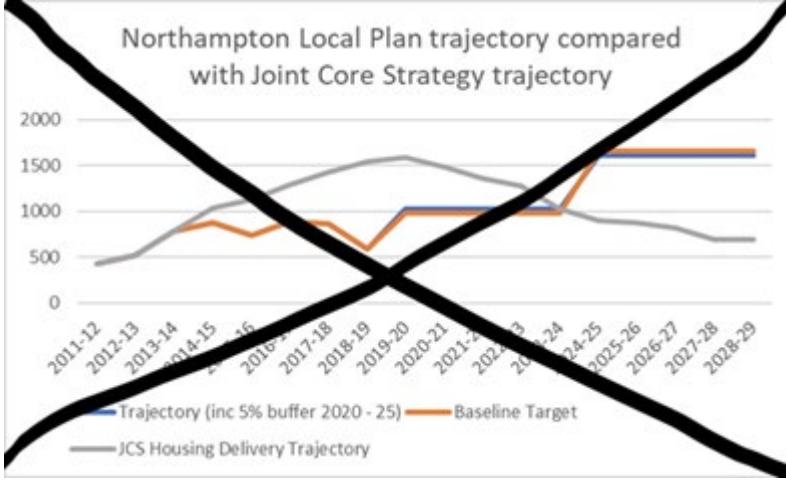
Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings														
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>3,394</p> <table border="1"><thead><tr><th>Source</th><th>Net additional dwellings</th></tr></thead><tbody><tr><td>Completions</td><td>6,957</td></tr><tr><td>Existing commitments as at 1st April 2021</td><td>1,889</td></tr><tr><td>Windfall allowance</td><td>1,800</td></tr><tr><td>Sustainable Urban Extensions</td><td>4,832</td></tr><tr><td>Allocations</td><td>3,838</td></tr><tr><td>Total</td><td>19,316</td></tr></tbody></table> <p>In formulating this local plan, the Council has undertaken a robust Land Availability Assessment. This detailed investigation concluded that the Council had sufficient supply to meet the requirement of about 18,870 net additional dwellings across the plan period to 2029, without over reliance on delivery of housing at the SUE's and therefore complies with Policy S3 of the adopted Joint Core Strategy. In addition, despite the results of the Housing Delivery Test and the changes to Northampton's position on housing delivery, across the five years of the Local Plan (2019/20—2023/24), there is still a predicted immediate shortfall.</p> <p>7.5 The following needs to be considered:</p>	Source	Net additional dwellings	Completions	6,957	Existing commitments as at 1 st April 2021	1,889	Windfall allowance	1,800	Sustainable Urban Extensions	4,832	Allocations	3,838	Total	19,316		
Source	Net additional dwellings																	
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Allocations	3,838																	
Total	19,316																	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <ul style="list-style-type: none">• Much of the identified under delivery so far has been the result of slower rates of housing completions in the Sustainable Urban Extensions than anticipated• The short term housing supply is constrained by the JCS's heavy reliance on large SUEs for substantially meeting the Borough's housing needs• The Council has researched alternative sites in the borough exhaustively through its Call for Sites and Land Availability Assessments. There are no other sources of supply that could address this short term shortfall <p>7.6 In the face of long term under delivery, which the Council has tried to overcome, it is unreasonable to envisage that historic under delivery against the JCS's proposed housing delivery trajectory can be addressed in the first five years of the Local Plan Part 2, particularly at a time when that same proposed delivery trajectory set out in the JCS sets unprecedented levels of housing delivery.</p> <p>7.7 The Council has therefore considered it necessary to have a housing trajectory that differs significantly from the proposed housing trajectory set out in the JCS.</p> <p>7.8 The housing assessment for Northampton Borough concluded that there is sufficient capacity to deliver 22,267 dwellings over the period 2011 to 2029 (this figure</p>		

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>includes all planning approvals and commitments, a proportion of homes through the Sustainable Urban Extensions, windfalls and the housing capacity identified through the proposed Local Plan Part 2 developments). The Joint Core Strategy only requires the delivery of 18,873 dwellings over this same period. This means that sufficient capacity has been identified to deliver 3,394 dwellings more than is required by 2029. Further information can be found in the Housing Technical Paper (Northampton Borough Council, May 2020).</p> <p>7.9 Taking into account the fact that delivery rates have proven to be low since 2011, particularly in Sustainable Urban Extensions, this surplus of 3,394 dwellings has been deducted from the requirement for 2019 – 2021 and a flat rate delivery rate of 1,030 dwellings per year has been applied to those years. This is a conservative approach which allows some contingency in case the SUEs continue to under-deliver, but it is also challenging given that it exceeds previous years' rates of delivery since 2011.</p> <p>7.10 From 2024/25 onwards, the annual requirement will step up to 1,609 dwellings per year. Clearly, the higher delivery level envisaged for the last five years of the Plan period is ambitious, but this matter can be addressed in the West Northamptonshire Strategic Plan, which is timetabled to have reached adoption in 2022. This will enable an early review of the Northampton Local Plan Part 2 to take place. This revised housing delivery trajectory is set out in Table 7 and Graph 2.</p>		

Table 7: Local Plan Part 2 Housing Delivery Trajectory

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording				Reason for modification	Implications for the SA findings
		Year	Trajectory (including 5% buffer for 2019– 2024), dwellings	Baseline Target, dwellings	Proposed Housing Trajectory from West Northamptonshire Joint Core Strategy, 2014, dwellings	Deletions and capacity changes as a result of flooding technical work. Changes to capacity and build rates established through	
		2011-12	423	423	423		
		2012-13	516	516	516		
		2013-14	834	834	785		
		2014-15	877	877	1,039		
		2015-16	739	739	1,132		
		2016-17	884	884	1,292		
		2017-18	865	865	1,426		
		2018-19	673	673	1,544		
		2019-20	1,030	981	1,588		
		2020-21	1,030	981	1,491		
		2021-22	1,030	981	1,355		
		2022-23	1,030	981	1,278		
		2023-24	1,030	981	1,025		
		2024-25	1,609	1,658	900		
		2025-26	1,609	1,658	875		

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings																
		<table border="1" data-bbox="563 452 1356 636"> <tr> <td>2026-27</td><td>1,609</td><td>1,658</td><td>815</td></tr> <tr> <td>2027-28</td><td>1,609</td><td>1,658</td><td>695</td></tr> <tr> <td>2028-29</td><td>1,609</td><td>1,658</td><td>694</td></tr> <tr> <td>Total</td><td>18,873</td><td>18,873</td><td>18,873</td></tr> </table> <p>Graph 2: Northampton Local Plan housing delivery trajectory</p>  <p>[1] Northampton Housing Technical Paper (Northampton Borough Council, March 2019) [2] Housing Delivery Test measurement rulebook (MHCLG, July 2018)</p>	2026-27	1,609	1,658	815	2027-28	1,609	1,658	695	2028-29	1,609	1,658	694	Total	18,873	18,873	18,873	statements of common ground with developers and promoters and planning applications.	
2026-27	1,609	1,658	815																	
2027-28	1,609	1,658	695																	
2028-29	1,609	1,658	694																	
Total	18,873	18,873	18,873																	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<u>[3] Northampton Housing Technical Paper (Northampton Borough Council, March 2019)</u> <u>[4] West Northamptonshire Joint Core Strategy (adopted 2014)</u> Revise policy as set out in Appendix 1		
MM12	Para 7.15, 7.20 and Policy 14	Paragraph 7.15, amend as follows: In accordance with Government guidance, the Council keeps a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in Northampton for those individuals to occupy as their sole or main residence. The register of self-build and custom-build projects also provides the Council with evidence when making provision for services plots of land. As at 30th October 2021, there were 39 entries on the register of self-build and custom build projects, giving an indication of the level of demand for which the Council needs to ensure provision. On the basis that the market has not made provision for self-build or custom build housing to address this identified demand, the Council requires that 3% of plots on development sites of more than 100 dwellings be provided as serviced plots for self-build and custom build dwellings, as set out in Policy 14. Policy 14, amend the wording in the 'Self-build and Custom Build Housing' section: On sites of more than 100 dwellings, 3% of the total number of plots should be provided as serviced plots for self and custom build provision should be made for a proportion of serviced plots to contribute towards meeting the evidenced demand..... <u>Plots which have remained vacant for 3 years 12 months after the installation of roads and utilities, sufficient to make them serviced plots, can be developed for other forms of housing provision if marketing evidence following a marketing strategy agreed by the local planning authority demonstrates that there have been no</u>		No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although Policy 14: Type and Mix of Housing and its supporting text identify a percentage for the number of plots for self and custom build homes, the purpose of Policy 14 remains the same in that it seeks to meet the need for self and custom build homes, unless there have been no expressions of interest. If there are no expressions of interest for self and custom build homes, other forms of housing provision are supported. Further clarity is provided on making homes accessible to wheelchair users but this does not alter the findings of the SA because the policy already sought to deliver accessible housing, with a significant positive effect already recorded against SA objective 1: housing.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<p><u>expressions of interest for the plots for the purposes of self-build and custom build housing.</u></p> <p>Paragraph 7.20, amend as follows: Accordingly, a significant proportion of new dwellings will need to be <u>built to Building Regulations Part M accessible and adaptable dwellings to Category 2 and 3 standards in Building Regulations. The Northampton Specialist Housing SPD (or its successor document will) provides further detail on the figures contained in Table 9 in terms of provision of Category 2 and 3 dwellings and should be referred to at the outset when considering specialist housing within schemes. Further work needs to be carried out to establish the proportion of category 2 dwellings that would be most appropriate.</u> The Housing Market Evidence <u>also recommends that a minimum of 4% of all market housing and 8% of all affordable housing be built to M4(3) of the Building Regulations. However, Planning Practice Guidance sets out that the requirement for wheelchair accessible homes (Category M4(3) (2) (b) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. wheelchair user dwelling standard (Category 3 of the Building regulations) and 8% of all affordable housing.</u></p> <p>Policy 14 , amend the wording within the Specialist and Accessible Housing section of to read:</p> <p><u>4% of all new market dwellings should be constructed to Building Regulations M4(3) (2) (a) and 8% of affordable dwellings where the council is responsible for allocating or nominating occupants</u> should be constructed to Building Regulations Part M4 (3) (2) (b)(Wheelchair user dwellings) standards, or their successor, to enable wheelchair adaptability and accessibility.</p> <p><u>Applicants will need to provide evidence when site constraints prohibit the ability to deliver the required amount of specialist housing. Constraints include sites that are vulnerable to flooding, site topography, instances where the provision of a lift to</u></p>	Amend para 7.20 to provide clarity on the evidence underpinning specialist housing requirements and when category M4(3) (2) (b) can be delivered. Amend Policy 14 to provide clarity on M4(3) dwelling requirements and provide detail on when sites may not be suitable for delivery of M4(2) and M4(3) housing.	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p><u>dwelling entrances is unachievable and other circumstances which may make a site less suitable for M4(2) and/or M4(3) housing, and where viability considerations would not allow for this provision.</u></p>		
MM13	Paras 7.26 and 7.27 and Policy 16	<p>Delete Policy 16 and supporting text:</p> <p>C. GYPSIES AND TRAVELLERS</p> <p>7.26 The West Northamptonshire Travellers Accommodation Needs Study[1] concluded that Northampton did not need to cater for additional pitches in the Local Plan for households that meet the planning definition of Gypsies and Travellers[2]. There are also no requirements to provide plots for travelling showpeople. However, temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations attended by Gypsies and Travellers. The Study concluded that a charge may be levied as determined by the Council although they only need to provide basic facilities including cold water supply, portaloos, sewage disposal point and refuse disposal facilities, to include cleansing of the site when vacated.</p> <p>7.27 This Travellers Accommodation Needs Study updates the requirements set out in Policy H6 of the West Northamptonshire Joint Core Strategy, so there is a need to replace this policy in this Plan, as set out in Policy 16. Policy 16 sets out development management criteria for any future provision that is required as result of any future evidence about requirements for Gypsy and Traveller provision.</p> <p>POLICY 16 GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE</p> <p>Provision will be made for the accommodation of Gypsies, Travellers and Travelling Showpeople in the period 2016 to 2029 to meet the needs identified in the most recent Gypsy, Traveller and Travelling Showpeople needs assessment.</p>	Matter to be addressed through review of the West Northamptonshire Joint Core Strategy.	<p>Policy removed: This proposed Main Modification will alter the findings of the SA because the removal of the heading, supporting text and policy will result in the effects recorded for that policy to no longer occur.</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>Applications for planning permission must meet the following criteria:</p> <ul style="list-style-type: none"> a) The site has safe and convenient vehicular access from the public highway, and provides adequate space for parking, turning and servicing on-site. b) The site is reasonably accessible to a range of services set out in national policy, i.e. shops, public transport, primary health care and schools. c) The site will provide an acceptable standard of amenity for the proposed residents. Sites which are exposed to high levels of flood risk and noise and air pollution are not acceptable. d) The site will be capable of providing adequate on-site services for water supply, power, drainage, sewage disposal, waste disposal, composting and recycling facilities. e) The scale and location of the site will not have an unacceptable impact on the landscape, local infrastructure and existing communities. f) In the case of sites for travelling showpeople there will be sufficient space for the storage and maintenance of equipment and the parking and manoeuvring of all vehicles associated with the occupiers. Additional screening may be required having regard to the nature of the equipment that is being stored. <p>Replaces Policy H6 of the Joint Core Strategy</p> <p>[1] West Northamptonshire Travellers Accommodation Needs Study (Opinion Research Services, January 2017)</p> <p>[2] Planning Policy for Travellers Sites (Department for Communities and Local Government, August 2015)</p>		
		Chapter 8: Economy		
MM14	Paragraph 8.14 and Policy 17	<p>Add to end of 8.14:</p> <p><u>Before the loss of any safeguarded employment site into another use, applicants will be expected to demonstrate that the site has been marketed for a relevant employment use for at least 12 months with no suitable interest being generated.</u></p>	To remove ambiguity from the policy	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although further detail has been added to the supporting text</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<p>The marketing should be undertaken in accordance with a strategy which ensures <u>that the property is actively marketed to all those likely to be interested in it. Evidence could be provided in terms of advertisements placed in professional journals as well as online. There could also be advertisements placed on the sites/ properties themselves to ascertain local interests in employment uses.</u></p> <p>Policy 17, 2nd bullet point, amend 2nd sentence: Evidence to be supplied includes details of <u>active</u> marketing undertaken over a <u>continuous</u> period of 6— 12 months which shows that the site has been actively and extensively marketed for employment use and that no suitable interest has been expressed.</p>		regarding marketing of the employment use of a site, and some additional wording added to Policy 17: Safeguarding Existing Employment Sites, its purpose remains the same in that it seeks to support economic growth and productivity.
MM15	Replace Paragraph 8.17, new paragraph and new Policy 17A	<p>Replace all of paragraph 8.17 with two new paragraphs:</p> <p><u>8.17 The Joint Authorities Monitoring Report for 2019/20 concluded that a net gain of 19,500 net jobs were created between 2008 and 2019 (see Table 10) compared to 21,500 in the previous year. This is the first fall in the number of jobs since 2012. There are further job losses expected as a result of the Covid pandemic but the overall net gain up to 2019 indicates that West Northamptonshire is still on track to deliver the target set by the Joint Core Strategy. The allocated commercial and employment sites in this local plan are expected to deliver around 2,950 jobs, and the Pannatoni Northampton site at Junction 16 is expected to deliver a further 2,800 new jobs. Around 7,300 jobs are expected to be created at Northampton Gateway, where the development of a railfreight terminal is underway. Although it is located next to the Northampton area boundary, it will function as part of Northampton and will boost the number of jobs that Northampton will contribute to the overall requirement.</u></p> <p><u>These, together with significant job opportunities that will be generated in the Daventry area (including the Daventry International Railfreight Terminal 3 which is expected to</u></p>	New policy added and sites previously allocated for employment uses in Policy 38 moved to the Employment section to clarify what uses the sites are allocated for.	No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although new Policy 17A: Employment Allocations lists the employment allocations and its supporting text sets out the number of jobs that will be delivered, the employment allocations have already been individually assessed on a 'policy off' basis with the results presented in Chapter 6 of the Main SA Report. This is consistent with the previous iteration of the SA whereby the

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings																										
		<p>create around 7,500 jobs and allocations in the Part 2 plan), South Northamptonshire area (including employment allocations in the Part 2 plan) and Sustainable Urban Extensions, all demonstrate that the West Northamptonshire area is on track to deliver the overall target of 28,500 jobs by 2029.</p> <p>New paragraph following 8.17. <u>To support the local economy and to help new job creation opportunities, sites are allocated in this plan for employment led uses. These sites are identified on the policies map.</u></p> <p><u>New Policy 17A:</u></p> <p>POLICY 17A EMPLOYMENT ALLOCATIONS</p> <p><u>The following sites are allocated for employment use. Other policies of particular relevance in this plan (non-exhaustive) are indicated</u></p> <table border="1" data-bbox="552 981 1477 1346"> <thead> <tr> <th data-bbox="552 981 698 1052">Reference</th><th data-bbox="698 981 844 1052">Address</th><th data-bbox="844 981 1012 1052">Area (Ha)</th><th data-bbox="1012 981 1181 1052">No. of Jobs (indicative)</th><th data-bbox="1181 981 1477 1052">Relevant Policies (Non-exhaustive)</th></tr> </thead> <tbody> <tr> <td data-bbox="552 1052 698 1156">LAA0167</td><td data-bbox="698 1052 844 1156">Tanner Street</td><td data-bbox="844 1052 1012 1156">0.38</td><td data-bbox="1012 1052 1181 1156">500*</td><td data-bbox="1181 1052 1477 1156">Policy 44 Policy 7 Policy 31</td></tr> <tr> <td data-bbox="552 1156 698 1224">LAA0594</td><td data-bbox="698 1156 844 1224">Sixfields East</td><td data-bbox="844 1156 1012 1224">10.18</td><td data-bbox="1012 1156 1181 1224">871</td><td data-bbox="1181 1156 1477 1224">Policy 29a and 29b</td></tr> <tr> <td data-bbox="552 1224 698 1311">LAA0598</td><td data-bbox="698 1224 844 1311">Car Park, Victoria Street</td><td data-bbox="844 1224 1012 1311">0.63</td><td data-bbox="1012 1224 1181 1311">286</td><td data-bbox="1181 1224 1477 1311">Policy 31</td></tr> <tr> <td data-bbox="552 1311 698 1346">LAA0615</td><td data-bbox="698 1311 844 1346">Crow Lane</td><td data-bbox="844 1311 1012 1346">2.92</td><td data-bbox="1012 1311 1181 1346">94</td><td data-bbox="1181 1311 1477 1346">Policy 7</td></tr> </tbody> </table>	Reference	Address	Area (Ha)	No. of Jobs (indicative)	Relevant Policies (Non-exhaustive)	LAA0167	Tanner Street	0.38	500*	Policy 44 Policy 7 Policy 31	LAA0594	Sixfields East	10.18	871	Policy 29a and 29b	LAA0598	Car Park, Victoria Street	0.63	286	Policy 31	LAA0615	Crow Lane	2.92	94	Policy 7	LAA0615 Crow Lane has been added to the list of sites previously included in Policy 38. It was omitted in error from Policy 38 but was shown on the Policies Map.	LAA0328 Cattle Market Road was included in error and should be identified on the policies map as safeguarded – this is identified in the list of Policies Map modifications.	equivalent policy for residential allocations was not separately assessed because it did not place any additional requirements on the allocated sites listed in the policy.
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		<u>Delivering WNJCS:</u> <u>Policy S7 (Provision of Jobs)</u> <u>Policy S8 (Distribution of Jobs)</u> <u>Policy E2 (New Office Floorspace)</u> <u>Policy E3 (Technology Realm, SEMLEP Northampton Waterside Enterprise Zone)</u>																																
		*these job numbers apply to LAA0818, LAA0167 and LAA0931																																
MM16	Policy 18	Policy 18, amend 1 st criterion: i. The site has been comprehensively assessed as being suitable for employment, and is consistent with other relevant policies in this plan and other development plan documents, and the proposed uses and associated employment activities can be carried out without causing harm to adjoining land uses and occupiers, including residential amenity. The Council supports windfall employment development proposals provided the site has been comprehensively assessed as being suitable for					To provide clarity on how employment applications outside designated sites will be assessed.																											
								More sustainable (effects score changed): This proposed Main Modification will alter the findings of the SA because the Policy 18: Supporting New Employment Developments and Schemes Outside Safeguarded Sites now requires																										

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p><u>employment purposes. These assessments should include a statement detailing the nature of the proposal, the number of jobs expected to be created, the potential impacts on the uses and occupiers of the surrounding area, and environmental (such as noise and pollution) and traffic considerations. The potential impacts on the surrounding areas should also cover matters such as impacts on the natural environment and heritage and non-heritage assets.</u></p>		<p>assessments to be undertaken that give consideration to natural and cultural heritage. Therefore, minor positive effects are expected in relation to SA objectives 9: biodiversity and geodiversity and 11: historic environment.</p> <p>Consideration is also to be given to noise and air pollution, in addition to traffic, and therefore supports the minor positive effects already recorded against SA objectives 2: sustainable travel, 8: climate change mitigation and 12: air quality.</p>
		Chapter 9: Hierarchy of Centres, Retail and Community Services		
MM17	New paragraph after Table 11 Policy 19	<p>Insert new paragraph below Table 11 to read:</p> <p><u>The retail provision figures set out in Policy 19 for convenience floorspace and comparison floorspace reflect the maximum figures to 2029 set out in Table 11 above.</u></p> <p>Policy 19, amend 1st paragraph to read:</p> <p>A. The Council will support the provision of <u>between 7,000 sq.m and about 8,900 sq.m net of convenience retail floorspace and between 5,300 sq.m and about 7,300 sq.m net of comparison floorspace to meet forecast retail expenditure to 2029 in the defined retail hierarchy as set out in the table below.</u></p> <p>3rd bullet point: delete (i) and revise so it reads as follows:</p> <p>Within the defined Primary Shopping Areas, development proposals should <u>provide an active frontage and be open for business during the day.</u></p>	To provide clarity about the retail floorspace provision figures in Policy 19 and how they have been derived.	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although the lower retail provision figures have been removed from Policy 19: New Retail Developments and Retail Impact Assessment, reference is still made to the maximum retail provision figures of 8,900sqm convenience retail floorspace and 7,300sqm comparison floorspace – both of</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<p>Last bullet point: Remove reference to "upper floor"town centre uses or upper floor residential use.....</p> <p>Last bullet point, remove reference to "to 18 " so the policy reads: '.....vacancy and marketing for 12to18 months</p>	<p>To reflect the new use class order which came into force on the 1st September 2020.</p> <p>To clarify that this part of the policy should allow residential uses at all levels and not just on the upper floors</p> <p>To remove ambiguity in the policy.</p>	<p>which were subject to SA. Although (i) has been removed, the purpose of the third bullet point remains the same – to contribute to the vitality and viability of the town centre. Further to this, although the policy could encourage residential uses on the ground floor, this is only when there has been a proven continuous period of vacancy and in line with the third bullet point, an active frontage must still be achieved. The continuous period of vacancy must still be evidenced, albeit 12 months.</p>
MM18	Paras 9.12 to 9.15 and Policy 20	<p>Delete text and policy relating to hot food takeaways:</p> <p>e. Hot food takeaways</p> <p>9.12 Nationally, it is estimated that obesity is responsible for more than 30,000 deaths each year. Public Health England anticipates that in the future, obesity could overtake tobacco smoking as the biggest cause of preventable death. Obese people are:</p> <ul style="list-style-type: none"> • At risk of certain cancers including colon cancer • More than 2.5 times more likely to develop high blood pressure (risk factor for heart disease) 	<p>Evidence not sufficient to justify policy.</p>	<p>Policy removed: This proposed Main Modification will alter the findings of the SA because the removal of the heading, supporting text and policy will result in the effects recorded for that policy no longer occurring.</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>• 5 times more likely to develop type 2 diabetes</p> <p>9.13 A Public Health Northamptonshire report referred to the following as being linked to the rise in obesity:</p> <p>We are living in an obesogenic environment where less than healthier choices are the default, which encourages excess weight gain and obesity</p> <p>While achieving and maintaining calorie balance is a consequence of individual decisions about diet and activity, our environment, and particularly the availability of calorie rich food, now makes it harder for individuals to maintain healthier lifestyles</p> <p>The increasing consumption of out of home meals, that are often cheap and readily available at all times of the day, has been identified as an important factor contributing to rising levels of obesity.</p> <p>9.14 the report states that in Northampton, 68.1% of the adult population over 16 are overweight or obese (compared to 62% in England), with children showing levels of 22.7% (4-5 years old) rising to 36.4% (10-11 years old). Analysis of national data shows that there is a statistical correlation between the density of fast food outlets and the prevalence of obesity. Northampton has the 3rd highest density in the country, at 86.9% per 100,000 population. It is therefore important for the Local Plan to address these challenges associated with health and wellbeing, and its relationship with poor diet and accessibility to facilities that contribute to this.</p> <p>9.15 According to Public Health England, takeaway foods tend to contain high levels of fat, saturated fat, sugar and salt, and lower levels of micronutrients. Some takeaway food can represent a low cost option to the consumer, which may enhance its appeal, including to children. Evidence shows that regular consumption of takeaway food over time has been linked to weight gain. Government guidelines support actions (like exclusion zones) to limit the proliferation of certain unhealthy uses within specified areas such as proximity to schools. Exclusion zone buffer sizes are usually set at 400m which is considered to be a reasonable 5 minute walk.</p>		

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>Policy 20 HOT FOOD TAKEAWAYS The health and well-being of Northampton communities will be maintained and improved by managing the locations of, and access to, unhealthy eating facilities. Proposals for new hot food takeaways (Class A5) which are situated within close proximity to a primary or a secondary school will only be permitted if the takeaway facility is located at least 400m from any entrance to the school</p>		
MM19	Policy 21	<p>Delete: In suitable locations, proposals that seek to deliver residential accommodation on upper floors in the town centre, district centres and local centres will be supported, subject to all other material considerations.</p> <p>and replace with the following: <u>Residential development within the town centre will be specifically supported where this is above ground floor and has access which does not require people to pass through a business use.</u></p>	To clarify the policy.	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although the sentence has been reworded, its meaning remains the same.</p>
MM20	Policy 23	<p>Revise 1st paragraph as follows:</p> <p>A. Sports facilities and playing pitches, as defined in the justification text, should be safeguarded from development unless:</p> <p>a) i. An assessment has been undertaken which has clearly shown <u>the open space, buildings or land to be that the facility is surplus to requirements; or</u></p> <p>b) ii. The loss resulting from the proposed development would be replaced by an equivalent or better provision in terms of quantity and quality in a suitable location; or</p>	To comply with the NPPF.	<p>More sustainable (effects score changed): This proposed Main Modification will alter the findings of the SA because major developments are no longer required to contribute towards providing sports facilities and playing pitches. Therefore, the significant positive effect recorded against SA objective 4: health and well-being should be downgraded to a minor positive effect. The</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<p>€) iii. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use</p> <p>C. Proposals for Major developments are expected to have regard to contribute towards providing facilities in line with the recommendations provided in....</p>		remaining changes to the policy wording will not alter the findings of the SA because they ensure consistency with the NPPF.
MM21	Policy 24	<p>Replace 1st and 2nd paragraphs:</p> <p>A. Proposals for new community facilities, alterations or extensions to existing facilities and change of use to such facilities, will be viewed favourably where they:</p> <ul style="list-style-type: none"> i. are located where the property/ site is accessible by public transport and other sustainable transport modes including walking and cycling ii. contribute positively to the well-being and social cohesion of local communities, and iii. do not result in any significant adverse impact on the residential amenity of the area including impacts associated with noise and traffic <p>Development of new, or alterations to existing, community facilities will be viewed favourably where they are in a sustainable location and contribute positively to the well-being and social cohesion of local communities.</p> <p>Proposals for new or extended community, and for change of use to such facilities, including places of worship, will be considered against the following:</p> <ul style="list-style-type: none"> • The property/ site should be accessible by public transport and other sustainable transport modes including walking and cycling • Any proposal should no result in any significant, adverse impact on the residential amenity of the area including impacts associated with noise and traffic 	To remove duplication that appears in the 1 st and 2 nd paragraphs.	No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although the first two paragraphs have been reworded, their meaning remains the same.
MM22	Policy 25	<p>1st bullet point:</p> <p>Remove the word "sustainable" and the comma so the policy reads:locate premises within sustainable locations, with good.....</p>	To remove ambiguity within the policy.	No change to SA findings: This proposed Main Modification will not alter the findings of the SA because the removal of the word

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		Wording to be deleted is struckthrough New wording is <u>underlined</u>		'sustainable' does not alter the overall meaning of the policy.
MM23	Policy 26	Amend 1 st sentence:on the Policies Map will be <ins>are</ins> allocated..... Last sentence amended to read: ...extended cemeteries should be sensitive to ensure there is no harm to result in a net gain in <ins>biodiversity</ins> .	To correct a typographical error. To ensure consistency with the National Planning Policy Framework.	Less sustainable (effects score changed): This proposed Main Modification will alter the findings of the SA because there is now a requirement to provide a net gain in biodiversity. Therefore, the minor negative but uncertain effect recorded against SA objective 9: biodiversity and geodiversity should be mixed with a minor positive effect.
		Chapter 10: Built and Natural Environment		
MM24	Policy 27	Amend 2 nd paragraph as follows: All <ins>major housing and commercial developments of 15 dwellings or more</ins> will be expected to deliver and/or contribute to.....' Add 'and blue' to 1 st and 2 nd paras as follows: 1 st paragraph: New developments must ensure that existing green <ins>and blue</ins> infrastructure assets will be protected..... 2 nd paragraph:will be expected to deliver and/or contribute to the green <ins>and blue</ins> infrastructure projects. Applications must be accompanied by a site-specific green <ins>and blue</ins> infrastructure strategy and /or plan to illustrate how green <ins>and blue</ins> infrastructure is integrated within the development proposal and how it seeks to improve connectivity to the Local Level Green Infrastructure network beyond the site boundary.	To ensure consistency with the NPPF's (Annex 2) definition of Major. To ensure the policy is effective with regards to blue as well as green infrastructure.	More sustainable (no change to effects score): This proposed Main Modification will not alter the findings of the SA because although commercial development is also now expected to deliver green infrastructure, a significant positive effect is already recorded against SA objective 9: biodiversity and geodiversity. However, the revised policy wording which now refers to commercial development, would contribute more greatly towards this significant positive effect. Further to this, although reference is now made to blue infrastructure,

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings								
				the SA already records a significant positive effect against SA objective 13: water management and states that enhancing the green infrastructure network is likely to improve water quality.								
MM25	Policy 28	Include new paragraph under 10.11 <u>Suitable Alternative Natural Greenspaces (SANGs) are existing areas of open land which are improved to attract residents of new developments away from designated sites such as Special Protection Areas and Special Areas of Conservation. SANGs need to be suitably designed for recreation, accessible and usually provide circular footpaths. As set out in Policy 28, the provision of a SANG may meet or contribute to the provision of other types of open space.</u> Amend table within Policy 28: <table border="1" data-bbox="557 949 1466 1211"> <thead> <tr> <th data-bbox="557 949 714 1060">Open space type</th><th colspan="3" data-bbox="714 949 1466 1060">Planning standards for new development</th></tr> </thead> <tbody> <tr> <td data-bbox="714 1060 1017 1211"></td><td data-bbox="1017 1060 1230 1211">Quantity per 1,000 population</td><td data-bbox="1230 1060 1309 1211">Maximum distance of provision from all parts of proposed development</td><td data-bbox="1309 1060 1466 1211"> Reference quality standard to be applied <u>Quality</u> </td></tr> </tbody> </table>	Open space type	Planning standards for new development				Quantity per 1,000 population	Maximum distance of provision from all parts of proposed development	Reference quality standard to be applied <u>Quality</u>	To provide a definition of SANGs and detail how they can meet other open space requirements. Addition of the word 'walk' to reflect the recommended walking thresholds set out in the OSSR. Addition of footnotes to direct the applicant to quality standards that should be used. Include to paragraph D to clarify how open space requirements	No change to SA findings: This proposed Main Modification will not alter the findings of the SA because the additional paragraphs provide clarification on SANG meeting or contributing to open space requirements. The addition of the word 'walk' provides further clarification on column three in the table, whilst the additional footnotes provide clarification on use of the quality standards.
Open space type	Planning standards for new development											
	Quantity per 1,000 population	Maximum distance of provision from all parts of proposed development	Reference quality standard to be applied <u>Quality</u>									

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording				Reason for modification	Implications for the SA findings
		Wording to be deleted is struckthrough New wording is <u>underlined</u>				are dealt with in relation to the SANG. Notes Para 10.8 - change to fig 16 (not 12)	
		Parks and gardens	1.43ha per 1,000	710m <u>walk</u>	Green Flag ³⁶ standard in association with the Local Quality Vision Statement		
Amenity green space	1.45ha per 1,000	480m <u>walk</u>	NBC Assessment Framework in association with the Local Quality Vision Statement <u>Green Flag Standard</u>				
Natural and Semi Natural Green Space	1.57ha per 1,000	720m walk	NBC Assessment Framework <u>Green Flag Standard</u>				
Children's Play and provision for young people	0.25ha per 1,000 of Designated Equipped Playing Space including teenage provision	400m <u>walk</u> for teenage LEAP 1,000m <u>walk</u> for NEAP 1,000m <u>walk</u> for teenage facilities	New LEAPs and NEAPs should meet the Fields in Trust ³⁷ standards as relevant to the individual site. New youth provision should reflect current best practice, and also take into account the needs expressed by young local people.				
	Allotments	0.36ha per 1,000	1,000m <u>walk</u>	Allotments should be secure with gates and			

³⁶ <https://www.greenflagaward.org//media/1019/green-flag-award-guidelines.pdf>

³⁷ <https://www.fieldsintrust.org/knowledge-base/guidance-for-outdoor-sport-and-play>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording				Reason for modification	Implications for the SA findings									
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <table border="1" data-bbox="541 454 1466 886"> <tr> <td data-bbox="541 454 720 663"></td><td data-bbox="720 454 855 663"></td><td data-bbox="855 454 990 663"></td><td data-bbox="990 454 1466 663">fencing providing suitable and accessible areas for growing, and where applicable, an adequate water supply and car parking.</td></tr> <tr> <td data-bbox="541 663 720 774">Civic Spaces</td><td data-bbox="720 663 855 774">Specific to the locality. No set standard required.</td><td data-bbox="855 663 990 774"></td><td data-bbox="990 663 1466 774"><u>Green Flag Standard</u></td></tr> <tr> <td data-bbox="541 774 720 886">Cemeteries and closed churchyards</td><td data-bbox="720 774 855 886">Specific to the locality. No set standard required.</td><td data-bbox="855 774 990 886"></td><td data-bbox="990 774 1466 886"><u>Green Flag Standard</u></td></tr> </table> <p>Include new paragraph D.</p> <p>D. Where Suitable Alternative Natural Greenspace (SANG) is required it is accepted that this may meet or contribute to the requirements of open space set out in the table above.</p>				fencing providing suitable and accessible areas for growing, and where applicable, an adequate water supply and car parking.	Civic Spaces	Specific to the locality. No set standard required.		<u>Green Flag Standard</u>	Cemeteries and closed churchyards	Specific to the locality. No set standard required.		<u>Green Flag Standard</u>		
			fencing providing suitable and accessible areas for growing, and where applicable, an adequate water supply and car parking.													
Civic Spaces	Specific to the locality. No set standard required.		<u>Green Flag Standard</u>													
Cemeteries and closed churchyards	Specific to the locality. No set standard required.		<u>Green Flag Standard</u>													
MM26	New para after 10.15 and Policy 29	<p>Include the following wording after para 10:15: <u>Biodiversity maps for Northampton can be found on the West Northamptonshire Council website, as well as through the Northamptonshire Biodiversity Records Centre.</u></p> <p>Replace existing policy, with two policies:</p> <p>POLICY 29A – Supporting and Enhancing Biodiversity</p> <p>A. The Council will require all development proposals to provide a net gain in biodiversity through the creation or enhancement of habitats by:</p> <p>i. Incorporating and enhancing existing biodiversity features on</p>	To take into account advice provided by Natural England to split the policy into two – covering biodiversity and nature conservation.													

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p><u>and/or off site;</u></p> <p><u>ii. Consolidating, developing and enhancing functionality of ecological networks including those beyond the Local Plan's boundary; and</u></p> <p><u>iii. Managing, monitoring and maintaining biodiversity within a development.</u></p> <p><u>B. Proposals should enhance natural capital and be designed around the existing components of the ecological network including sites of national or international importance, sites of local importance and other biodiversity assets.</u></p> <p><u>C. All applicants are expected to assess the impacts of their proposals on biodiversity, including indirect impacts such as recreational activities. Applicants should have regard to the Northamptonshire Biodiversity Action Plan and the latest guidance on biodiversity net gain when developing proposals. The Council requires applicants to use a recognised biodiversity calculator such as the DEFRA metric.</u></p> <p><u>D. Development that does not achieve biodiversity net gain, and fragments habitats and links will be refused.</u></p> <p><u>Policy 29B – Nature Conservation</u></p> <p><u>A. The Council requires development to protect, maintain and enhance biodiversity and geodiversity. All proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment. If harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for, planning permission will be refused.</u></p> <p><u>B. Proposals should have regard to principles set out in the Northamptonshire Biodiversity SPD or successor document and where necessary undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards to inform development.</u></p>		for Policy 29A: Supporting and Enhancing Biodiversity remain the same as those previously recorded for original Policy 29, whilst Policy 29B: Nature Conservation is likely to result in a significant positive effect against SA objective 9: biodiversity and geodiversity and minor positive effects against SA objectives 4: health and well-being and 10: landscapes and townscapes. The additional wording after paragraph 10.15 provides clarity on where to find biodiversity maps for Northampton.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<p>C. The Council will seek the protection or enhancement of the ecological network in <u>proportion to the site's designation status, the contribution it makes to the ecological network and take account of considerations set out below:</u></p> <ul style="list-style-type: none"> I. <u>Sites of national or international importance</u> - Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest are of international and/or national importance and development affecting them will be expected to avoid causing adverse effects. II. <u>Sites of local importance</u> - Development affecting Northampton's Local Nature Reserves, Local Wildlife Sites, Local Geological Sites and Potential Wildlife Sites will be expected to avoid causing adverse effects on these assets unless it can be demonstrated that the benefits of development clearly outweigh the harm. III. <u>Other biodiversity assets</u> - Development affecting sites that are not formally designated, but which make a positive contribution to biodiversity, will be required to take into account their current or potential role in the Borough's Northampton's wider biodiversity network. 		
MM27	Paras 10.17, 10.18 and 10.20 and Policy 30	Paragraph 10.17, amend to the following: The Upper Nene Valley Gravel Pits Special Protection Area (SPA) Supplementary Planning Document (SPD) was adopted by <u>West Northamptonshire Council in November 2021</u> the Council in 2015—and supplements the policies contained in the West Northamptonshire Joint Core Strategy (WNJCS). It highlights the requirement to consult Natural England on proposals that could affect the SPA and details consultation zones for different types of development. It should be referred to when preparing development proposals. A mitigation strategy <u>has also been adopted (March 2022)</u> will be prepared for the Upper Nene Valley Gravel Pits SPA which is appended to the above SPD. with a view to its subsequent adoption as an addendum to the SPD. It will advise applicants to ensure that development (standalone and cumulative) does not impact negatively on this biodiversity asset. This document will be produced within 12 months of the adoption of the Northampton Local Plan Part 2. However, the	To reflect that the council has now adopted a mitigation strategy for Unit 1 of the Upper Nene Valley Gravel Pits SPA.	More sustainable (effects score changed): This proposed Main Modification will alter the findings of the SA because Policy 30: Upper Nene Valley Gravel Pits Special Protection Area and its supporting text have been refined to clearly set out the mitigation requirements for development in close proximity to the Upper Nene Valley Gravel Pits Special Protection Area. A new appraisal matrix has been produced for the revised policy, which can be found in Appendix B . The effects

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>broad principles and a draft of the mitigation strategy agreed with Natural England will be prepared prior to the adoption of the local plan.</p> <p>Paragraph 10.18, amend to the following: Since the adoption of the WNJCS, Natural England has continued to monitor visitor pressure on the SPA. Evidence shows that new housing within 3km of the SPA has increased recreational pressure, contributing to disturbance of, 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 within this local plan is addressed. With Due the amount of potential development being progressed within the vicinity, Northampton Borough Council will prepare an appropriate mitigation strategy to prevent additional pressure and disturbance to the birds. The strategy will draw on evidence of existing recreational impact and forecast additional impact from proposed residential growth, it will then identify suitable mitigation measures such as access management and monitoring to minimise impact on the SPA. Without mitigation, any increase in the number of residential units near the SPA has potential to increase the significance of the effect by increasing the number of visits to the designated site. To protect the SPA from recreational pressure as a result of residential development the mitigation strategy identifies a number of measures including provision of information panels and wardening of the SPA to educate visitors. Residential development is required to pay a Strategic Access Management and Monitoring (SAMM) contribution and / or provide bespoke mitigation to provide this mitigation and protect the SPA.</p> <p>Paragraph 10.19, remove final bullet point:</p> <p>Monitoring of the impacts of new development on the SPA to inform the necessary mitigation requirements and future refinement of any mitigation measures</p>		for the revised policy remain the same as the original, with the exception of a minor positive effect that is now expected against SA objective 13: water management. This is because there is now a requirement in the policy for major developments to demonstrate that there is sufficient capacity at the receiving Water Recycling Centre to ensure water quality is protected.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>Paragraph 10.20 - New sentence after the 1st sentence: <u>In addition, there could be impacts on areas of functionally linked land which support the bird species (golden plover and lapwing) for which the Upper Nene Valley Gravel Pits SPA has been designated.</u></p> <p>Policy 30, amend as follows: <u>Proposals must ensure that there is no adverse impact either alone or cumulatively on the Upper Nene Valley Gravel Pits SPA and Ramsar site.</u></p> <p><u>Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.</u></p> <p><u>Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the UNVGP SPA Supplementary Planning Document.</u></p> <p><u>Applications comprising a net gain in residential units within 3 km of the Upper Nene Valley Gravel Pits SPA and Ramsar site will, in combination, have an adverse effect on the integrity of the SPA if not mitigated. need to demonstrate that the impact of any increased recreational activity or pet predation (indirect or direct) on the SPA and Ramsar site will not have a detrimental impact.</u></p> <p><u>The Local Planning Authority has adopted a mitigation strategy for Unit 1 of the Upper Nene Valley Gravel Pits SPA which must be referred to when preparing an application that is located within 3km of Unit 1 of the SPA. Residential development will be required to pay a Strategic Access Management and Monitoring (SAMM) contribution and / or provide bespoke mitigation such as a Suitable Alternative Natural Greenspace</u></p>		

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>(SANG) in order to mitigate recreational impact. will prepare a Mitigation Strategy document concerning the UNVGP SPA which is to be adopted as an Addendum to the UNVGP SPA Supplementary Planning Document by the time this Local Plan is adopted. In some cases developments will be expected to provide bespoke mitigation such as Suitable Alternative Natural Greenspaces (SANGs).</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</p> <p>Other adverse effects could include the loss or fragmentation of functionally linked land supporting habitat, non-physical disturbance (noise, vibration or light), and impacts due to water runoff. Sites that could potentially be functionally linked land associated with the SPA will need to undertake overwintering bird surveys early in the planning process ahead of submitting an application, , 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>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>In order to protect sightlines for birds included within the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar site, new development within a 250m zone of the Special Protection Area and Ramsar site shown on the policies map must undertake an assessment to demonstrate that it will not have a significant adverse effect on birds within the area or, if directly adjacent to existing buildings, should reflect surrounding building heights.</p>		

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>		
MM28	Paragraph 10.26 and Policy 31	<p>Paragraph 10.26, add to the end: <u>All proposals should be developed consistent with guidance from Historic England and heritage best practice.</u></p> <p>Policy 31, amend last bullet point:</p> <ul style="list-style-type: none"> • v)-Being consistent with <u>Having regard to</u> guidance from Historic England and heritage best practice 	To reflect the recommendation provided by the Planning Inspectors.	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA as the additional sentence provides clarification on best practice guidance, whilst the minor change to the wording in the last bullet point of Policy 31: Protection and Enhancements of Designated and Non-Designated Heritage Assets does not change the overall meaning of the sentence.</p>
		Chapter 11: Movement		
MM29	Policy 32	<p>Remove the 1st paragraph and replace with the following text:</p> <p>In order to deliver a high quality, accessible sustainable transport network, the Council will require developers to fund and financially contribute towards a range of transport schemes through the relevant legal agreements and planning conditions, in order to meet the growth requirements of this local plan, to mitigate the impacts of developments and to ensure they create a high quality, sustainable, accessible development that is well connected to the rest of the Borough.</p> <p>A. <u>In order to deliver a high quality, accessible and sustainable transport network proposals will be required to deliver or contribute to the infrastructure projects contained within Appendix D of this Plan which are necessary to make them acceptable as per the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (or subsequent policy/regulations).</u></p> <p>All major applications will also be required to include a Travel Plan. Applicants will be required to demonstrate that they can mitigate the proposal's transport impact either on site or off site.</p>	To ensure Policy 32 is effective, clear and unambiguous for decision makers.	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although additional reference to delivering a sustainable transport network has been added, in addition to a reference to Travel Plans, significant positive effects are already recorded in relation to SA objectives 2: sustainable travel, 8: climate change mitigation and 12: air quality.</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<p>B. Developments should be designed to incorporate, demonstrate and achieve the following sustainable travel principles:</p> <ul style="list-style-type: none">• i. To promote, improve and encourage active lifestyles and health and wellbeing• ii. To promote modal shift away from and reduce car usage• iii. To improve accessibility by, and usability, of sustainable transport modes including public transport• iv. To maximise opportunities for integrated secure and safe walking and cycling routes which connect to the existing network (<u>including public rights of way</u>), as well as open spaces and green infrastructure• v. To secure a high quality design of the street scene which creates a safe, secure and pleasant environment• vi. To upgrade and improve the existing street scene• vii. To design developments including the provision of streets, streetscapes and open spaces which enable and encourage children to walk, cycle and play within their local environments• viii. To promote sustainable travel to day-to-day destinations including the town centre, the railway station, the bus station, places of work, schools and colleges, health facilities and local leisure and recreation facilities• To provide electric vehicle re-charging points in line with Policy 34 and Policy 35 <p>Major new developments of 10 dwellings or more, or 0.5ha or more, must include a long term management strategy (travel plan) for integrating proposals to promote and encourage sustainable travel and reduce greenhouse gas emissions, including travel planning for new users</p> <p>C. Applications for major new developments will need to be accompanied by a Travel Plan. The Travel Plan needs to specify a long-term management strategy for integrating proposals to promote and encourage sustainable travel and reduce greenhouse gas emissions. This will include travel planning for new users. Applicants</p>		

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<u>will need to demonstrate that they can mitigate the proposal's transport impact either on site or off site.</u> <u>D. All development must provide electric vehicle charging points in accordance with the standards set out in Appendix I.</u> <u>E. Development in the town centre will be expected to contribute towards the creation of new public routes and the facilitation of access, circulation and ease of use.</u>	To provide clarity on the requirement for electric vehicle charging points in new developments.	
MM30	Policy 33	Amend 1 st bullet point: <u>i. There would be no unacceptable impacts on highway safety and that the residual cumulative impacts on the road network are not severe, adverse impacts on the local and/or strategic transport network which cannot be mitigated against. Major planning applications and development All development proposals.....by a Transport Assessment or Transport Statement; and</u>	To ensure consistency with the NPPF.	No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although the bullet point has been reworded, its meaning remains the same.
MM31	Paragraphs 11.15 to 11.17 and Policy 34	Amend paragraph 11.15 as follows: There is a range of planned and potential future transport projects that will take place during and beyond the Local Plan period including the Brackmills & Northampton Station Corridor improvements, the North West Relief Road, the Northern Orbital Route, the Northampton Growth Management Scheme affecting the A45 and the dualling of the A43 from Northampton to Kettering. In addition, a number of strategic opportunities have been identified that have the potential to improve the range of destinations served by direct trains from Northampton and to improve access between cities to the north of Northampton, Northampton and the wider Oxford-Cambridge Corridor. Accordingly, the route of the former Northampton to Market Harborough railway has been safeguarded as a potential transport corridor.	Route is no longer safeguarded.	Less sustainable (no change to effects score): This proposed Main Modification will not alter the findings of the SA because although the policy states that the former Northampton to Market Harborough and Northampton to Brackmills routes may be investigated for future transport use in a local plan review instead of being safeguarded, the policy still promotes sustainable transport. The proposed Main Modification adds further detail to the supporting text

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>Amend paragraph 11.16 as follows:</p> <p>The former Northampton to Market Harborough railway line now plays a significant role in the biodiversity network of Northampton and beyond, with a series of identified Local Wildlife Sites (LWS) located within / alongside it due to the species rich neutral grasslands (a Priority Habitat under the Natural Environment and Rural Communities Act, 2006) found within them, as well as itself, being a wildlife corridor. Any reopening of the former Northampton to Market Harborough railway line will be led by Network Rail and will need to be subject to relevant studies that consider alternative options and provide justification for the most sustainable option, bearing in mind its high biodiversity status. <u>If further evidence emerges that the future use of this link for transport is viable, the use of this route will need to be investigated in a future local plan review.</u></p> <p>Amend paragraph 11.17 as follows:</p> <p>A safeguarded corridor between Brackmills and <u>Castle Northampton</u>-Station is identified for use as a continuous public transport, cycling and/or walking route. The Council needs to safeguard the land required for transport-related developments to be progressed. Any proposals affecting this corridor should mitigate against the potential adverse impacts on biodiversity, and seek to secure net gain, in compliance with the relevant policies in this local plan. <u>If further evidence emerges that the future use of this link for transport is viable, the use of this route will need to be investigated in a future local plan review.</u></p>	<p>To ensure that the route is capable of being investigated in a future local plan review.</p> <p>To ensure that the route is capable of being investigated in a future local plan review.</p>	<p>and although the list of mitigation measures ensures the policy is unambiguous to decision makers, it does not alter the overall purpose of the policy and therefore does not change any of the effects previously recorded for this policy in the SA.</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>Policy 34, amend 1st paragraph as follows:</p> <p>A. The routes<u>of the former Northampton to Market Harborough and Northampton to Brackmills railway lines</u>, as shown on the Policies Map, is safeguarded <u>may be investigated</u> for future transport use <u>in a local plan review</u>.</p> <p>Amend last bullet point to read:</p> <p><u>D.</u> Transport schemes which provide an element of environmental protection will be prioritised. In some cases, it may be necessary to <u>have regard to mitigation measures</u> provide mitigation in line with table 10 of the Northampton Low Emission Strategy 2017 (or the appropriate part of a successor document) <u>namely:</u></p> <p><u>Implementation and operation of Clean Air Zones (CAZ) or Low Emission Zone</u> <u>Development of Ultra-Low Emission Hubs and Corridors</u> <u>Northampton Electric Vehicle Plan</u> <u>Cycling Hubs</u> <u>Plugged-in development and demonstration schemes</u> <u>Infrastructure for low emission, alternative fuels including refuse collection services</u></p>	<p>To ensure GI is taken into consideration in any proposals.</p> <p>To ensure criterion is effective, clear and unambiguous for decision makers.</p>	
MM32	Policy 35	<p>Amend policy to read:</p> <p>New development must meet adopted parking standards and accord with have regard to the principles set out in the Parking Standards SPD, including the provision of facilities for electric vehicle charging points. <u>Proposals for Transport schemes and major new developments should also provide a car parking management strategy.</u></p>	<p>To correctly reflect the relationship between the policy and supplementary planning document</p> <p>To delete element that repeated Policy 32</p>	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although reference to the provision of facilities for electric vehicle charging points has been removed, reference is made to the Parking Standards SPD which promotes the provision of electric vehicle charging points.</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>		
		Chapter 12: Infrastructure		
MM33	Paragraph 12.6	<p>Add three new sentences at the beginning of paragraph 12.6:</p> <p><u>Part R of the Building Regulations (Physical Infrastructure for high-speed electronic communication networks) require the provision of in-building physical infrastructure from the service provider's 'access point' to the occupier's 'network termination point'. Objective 13 of the Plan seeks to enhance local services and ensure technology infrastructure is adequately provided to meet the needs of people and business and to ensure that relevant utilities are provided prior to occupancy. Policy 36 ensures that in-building broadband infrastructure is connected to infrastructure provided in the vicinity.</u></p>	To clarify the complementary relationship between the requirements of Part R of the Building Regulations and Policy 36.	<p>No change to SA findings: This proposed Main Modification relates to the supporting text to Policy 37: Infrastructure Delivery and Contributions, proposed changes to which are considered separately below in relation to their implications for the SA findings.</p>
MM34	Paragraphs 12.12 and 12.13 and Policy 37	<p>Amend paragraph 12.12:</p> <p>The plan calculates the additional school places required to accommodate the future growing population <u>as a result of changes to birth rate and inward migration levels. The impact of additional housing growth allocated through the local plan process is expected however to place further pressure on local school capacity.</u> 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 funding agreements with the Secretary of State for Education. <u>The majority of new schools delivered in Northampton will be free schools.</u></p> <p>Amend paragraph 12.13:</p> <p>The funding provision for <u>education</u> <u>new school places</u> 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 Community Infrastructure Levy <u>where schools are required as a result of housing growth.</u> 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 <u>in order to mitigate the development</u>, where it is to be located and the associated cost.</p>	<p>To reflect consultation from former Northamptonshire County Council and to provide further factual details.</p> <p>To ensure provision is made where</p>	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although reference to 'full fibre' connectivity has been removed from Policy 37: Infrastructure Delivery and Contributions, Policy 36: Electronic Communication Networks refers to technology infrastructure.</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>		
		<p>Insert new paragraph after 12.13: <u>It will also 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.</u></p> <p>Policy 37, delete last sentence of 1st paragraph: <u>Developers are also required to provide delivery of "full fibre" connectivity to new built development.</u></p>	<p>appropriate for Early Years provision.</p> <p>To avoid duplication of Policy 36.</p>	
		Chapter 13: Site Specific Allocations and Policies		
MM35	Policy 38	<p>Delete current paragraphs 13.1 to 13.3</p> <p>13.1 The West Northamptonshire.....through to heritage specialists.</p> <p>and replace with</p> <p><u>13.1 This plan makes allocations for housing and employment use in policies 13 and 17A. For most of the allocations, sufficient guidance on requirements for planning applications is provided by the policies in this and other development plan documents. Some sites have a number of constraints where additional policy guidance is necessary. The following sections of this plan provide this additional guidance.</u></p> <p>Delete Policy 38 in its entirety</p> <p>Policy 38 DEVELOPMENT ALLOCATIONS.....and other material considerations.</p>	<p>To provide clarity on the different development allocations within the local plan.</p>	<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although Policy 38: Development Allocations has been superseded by Policies 13: Residential and Other Residential Led Allocations and 17A: Employment Allocations, Policy 38 was not separately assessed in the SA because it did not place any additional requirements on the allocated sites listed in the policy – all of which were individually assessed on a 'policy off basis'.</p>
MM36	Paragraphs 13.6 and 13.9 and Policy 39	<p>Amend paragraph 13.6</p> <p>Amend 2nd sentence:</p>		<p>No change to SA findings: This proposed Main Modification will not alter the findings of the SA because Class A has been replaced with</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>Network Rail has indicated that subject to the current and future freight/ commercial operation being moved elsewhere, provision of a suitable replacement site to accommodate railfreight activities this opens up the potential for the residual railway land to be developed.</p> <p>Add a new paragraph after 13.9:</p> <p><u>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 this 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.</u></p> <p>Policy 39, amend 5th paragraph: ...residential and ancillary <u>Class A</u> <u>Class E</u> uses.</p> <p>6th paragraph, amend: On site LAA0333, the Council will support the delivery of at least 200 <u>about 188</u> dwellings.....</p> <p>9th paragraph, amend 1st bullet:</p> <ul style="list-style-type: none"> • i. A high quality development that preserves and enhances the significance <u>and appreciation</u> of the former castle site and in particular the scheduled monument and listed Postern Gate and the setting of these heritage assets., <u>its designated components and their setting. Design and capacity will be informed by detailed archaeological investigations and assessments in advance of development. The proposals should provide opportunities to enhance the significance of the identified heritage assets</u> 	<p>To reflect comments from Network Rail.</p> <p>To reflect change in the Use Classes Order</p>	<p>Class E (a,b,c), and Policy 39: Northampton Railway Station, Railfreight and Adjoining Sites still supports the delivery of mixed-use development. Therefore, Policy 39 is still expected to have a significant positive effect in relation to SA objective 6: economy. A significant number of new homes is still proposed to be delivered and therefore Policy 39 is still expected to have a significant positive effect in relation to SA objective 1: housing. Although the first bullet point of the policy has been reworded, its meaning remains the same. The new paragraph at the end of the policy also will not alter the findings of the SA because the SA is too high-level to give consideration to site access, which is typically considered at planning application stage. The additional paragraph on the existing sewer within the boundary of the site requires the layout of the site to be designed in a way that takes this into account. Due to the fact a significant positive effect is already recorded in relation to SA objective 10: landscapes and townscapes, there will be no changes to this</p>

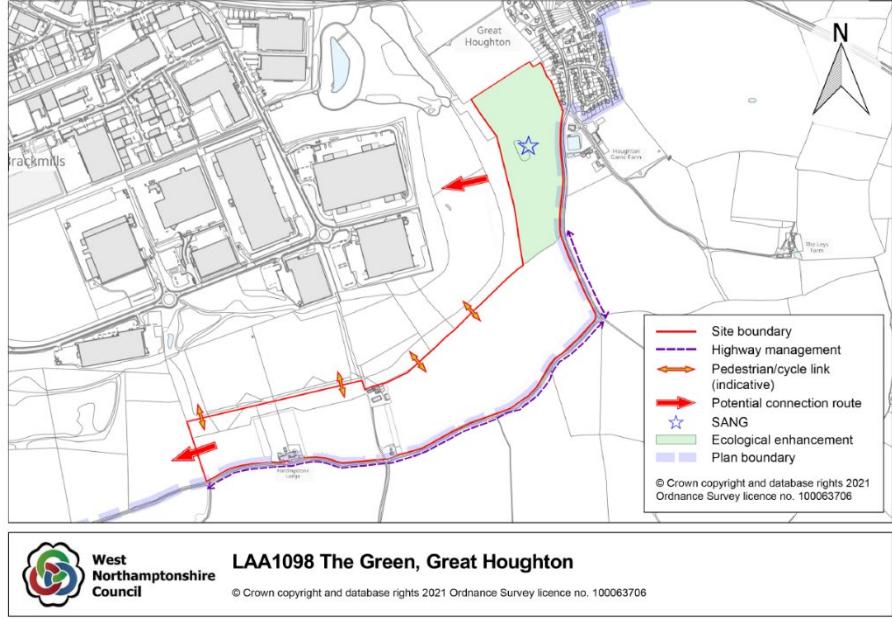
Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>Add a new paragraph at the end of the policy</p> <p><u>L. Any proposal should include the safeguarding of suitable access for the maintenance of foul drainage infrastructure.</u></p>		<p>To reflect the consultation response from Anglian Water and to strengthen the policy position.</p> <p>effect. The rewording of the second sentence of paragraph 13.6 provides additional clarification and will not result in any changes to the effects previously recorded.</p>
MM37	Paragraphs 13.12, 13.14 Policy 41 and Figure 20	<p>Add the following after the last sentence of paragraph 13.12: <u>It is therefore important to ensure that there is a reasonable buffer created between this existing village and the new development on The Green to ensure that the setting of the conservation area and its heritage assets can be respected and protected, and the identity of the village is maintained. There will also be an opportunity to provide semi natural stepping-stones (connected habitats) adjacent to and within the site that will provide habitat links.</u></p> <p>Add a new paragraph after 13.14 <u>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.</u></p> <p>Amend Policy 41 as follows:</p> <p>POLICY 41 THE GREEN, GREAT HOUGHTON (LAA1098)</p>		<p>Rewritten policy: This proposed Main Modification will alter the findings of the SA because the site-specific policy for site LAA1098 has been rewritten. An appraisal matrix has been produced for this rewritten policy, which can be found in Appendix C. The effects for the rewritten policy remain the same as the original, with the exception of significant positive effects (as part of a mixed effect) in relation to SA objective 4: health and well-being, minor negative effects expected in relation to SA objective 9: biodiversity and geodiversity and minor positive effects expected in relation to SA objectives 13: water management and 14: flood risk. The rewritten policy is also expected to contribute more greatly towards the minor positive effect already</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<p>Housing development of up to about 800 dwellings, which comply with the development principles shown on Figure 20 will be supported <u>at The Green, Great Houghton</u>, subject to the following criteria being met:</p> <ul style="list-style-type: none"> i. <u>Winter surveys are to be undertaken to determine whether the site is used by over-wintering Golden Plover / Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat.</u> ii. <u>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.</u> iii. <u>Any development on this site must adhere to Policy 30 of this Plan, in particular with reference to recreational disturbance and functionally linked land associated with the Upper Nene Valley Gravel Pits Special Protection Area.</u> iv. <u>The built development should only take place outside of the area shaded green in the diagram</u> v. <u>The schemes 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</u> vi. <u>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</u> vii. <u>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. Appropriate types of habitat and accessibility are to be determined following surveys for Special Protection Area birds</u> 		<p>recorded against SA objective 10: landscapes and townscapes (as part of a mixed effect).</p> <p>A minor change was also made to the boundary of the site but which did not alter any of the 'policy-off' effects previously recorded (see 'SA of Main Modifications to site allocations' section of this report).</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<ul style="list-style-type: none"> viii. The development provides suitable transport links to neighbouring developments, including neighbourhood centres and community facilities ix. 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 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 x. Any p <u>Proposals that comes forward</u> should include suitable measures to mitigate the impact of additional traffic generated by the development. The vehicular access to the site shall not use the Green as a principal access and the development should seek to minimise additional traffic through Great Houghton village, and reduce the potential for traffic to use the Green or routes through the allocation to travel between the Newport Pagnell Road and the Bedford Road xi. Any proposal should also include <u>Proposals will be informed by air quality and noise impact assessments due to proximity to from the Brackmills Industrial Estate</u> xii. Any a <u>Applications</u> on the site will need to be accompanied by an archaeological investigation that considers any archaeological potential on the site. xiii. <u>Proposals must be accompanied by a landscape vision for the site including details of how views across the site into and out of the village of Great Houghton will be managed, especially views of the Grade II* listed church. The location and layout of the SANG could must assist in achieving the landscape vision for the site.</u> xiv. Any proposal forwarded <u>Proposals</u> for this site should be accompanied by a site specific Flood Risk Assessment <u>meeting the design standard for the Upper Nene catchment through Northampton of a 0.5% probability (1 in 200 chance of occurring in any given year) event plus climate change. Surface water attenuation should be provided up to this standard. Any proposal</u> 		

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<p>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 protect against pluvial flooding.</p> <p>xv. <u>Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS).</u></p> <p>xvi. <u>The safeguarding of suitable access for the maintenance of foul drainage infrastructure is maintained.</u></p> <p>xvii. <u>A Suitable Alternative Natural Greenspace (SANG) will be secured.</u></p> <p>xviii. <u>Proposals must be informed by a masterplan for the whole allocation which will be expected to:</u></p> <ul style="list-style-type: none"> a. <u>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</u> b. <u>Provide suitable transport links to neighbouring developments, including neighbourhood centres and facilities</u> c. <u>Manage and control vehicular access to and from the site to the northern section of The Green near to the village of Great Houghton, minimise traffic through Great Houghton and provide alternative means of accessing the site other than from the Green.</u> d. <u>Connect the site to nearby Brackmills Country Park and surrounding areas including pedestrian and cycling provision to secure connectivity and permeability within the site, to the employment area to the north, the proposed residential areas to the west along The Green and to Great Houghton as shown on Figure 20</u> e. <u>Provide a SANG within the area identified in Figure 20 which provides the following:</u> <ul style="list-style-type: none"> i. <u>Protection, enhancement and / or creation of habitats in line with other policies of this plan</u> ii. <u>Accessibility for residents' recreation including an off-lead dog walking area</u> 		

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<ul style="list-style-type: none">iii. <u>A circular walking route around the SANG and eastern development area</u>iv. <u>A clear separation between the developed site and the village of Great Houghton in order to protect its setting and the heritage assets of the village</u>v. <u>Formal and informal open space</u>vi. <u>A SANG car park</u>vii. <u>If any part of the SANG is proposed off-site, the SANG will need to be adjoining the site.</u> <p>xix. <u>Ensure built development (other than as may relate to recreation and SANG functions) only takes place outside the SANG, the broad location of which is defined in Figure 20.</u></p> <p>Revised Figure 20:</p>		

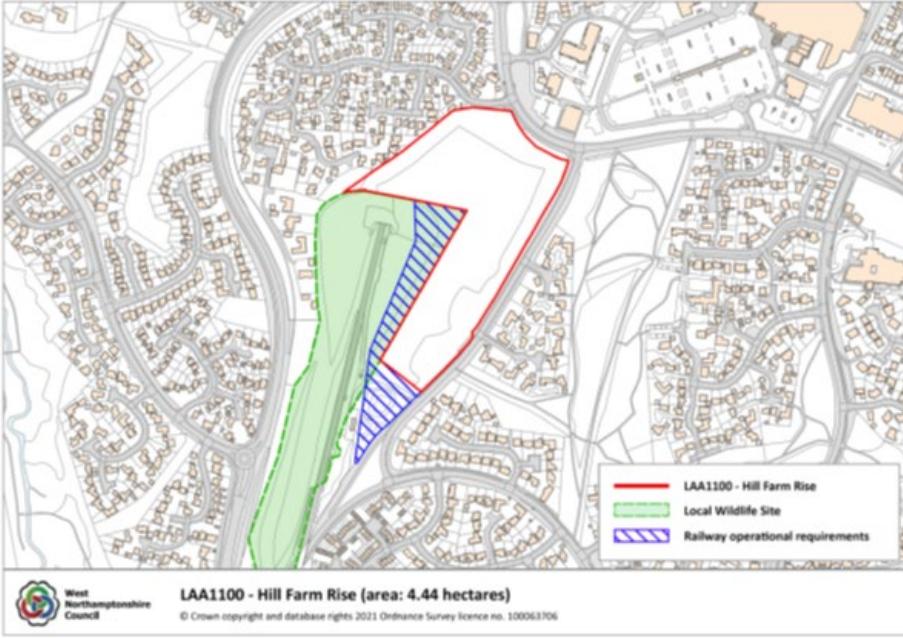
Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined></u>	Reason for modification	Implications for the SA findings
		 <p>The map shows the Great Houghton area with various buildings and roads. A green shaded area represents the proposed development site. A red line indicates the Site boundary. A purple dashed line shows Highway management and Pedestrian/cycle link (indicative). Red arrows point to Potential connection routes. A blue star marks a SANG (Strategic Area for Natural Growth) location. A legend identifies the symbols: Site boundary (red line), Highway management (purple dashed line), Pedestrian/cycle link (indicative) (orange double-headed arrow), Potential connection route (red arrow), SANG (blue star), Ecological enhancement (green shaded area), and Plan boundary (light blue shaded area). A north arrow is also present.</p> <p>LAA1098 The Green, Great Houghton <small>© Crown copyright and database rights 2021 Ordnance Survey licence no. 100063706</small></p>		
MM38	Policy 43 and Figure 22	Policy 43: Amend 1 st paragraph: <u>A. Ransome Road will be developed for at least 200 about 500 dwellings....</u> Amend 1 st bullet point: <ul style="list-style-type: none"> • i. 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 	It has been demonstrated that the sites is able to accommodate a significantly larger number of dwellings.	No change to SA findings: This proposed Main Modification will not alter the findings of the SA because although 500 dwellings instead of 200 dwellings will now be provided (roughly 200 will be provided within the Plan period), a significant

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>Add new bullet point at the end of the bullet points: vi. <u>Design and capacity will be informed by detailed archaeological investigations and assessments in advance of any planning application being submitted.</u></p> <p>Amend legend in figure 22: <u>Green Corridor</u><u>Greenspace</u> (indicative)</p>		<p>positive effect is already recorded against SA objective 1: housing. Although there is now a requirement for archaeological investigations and assessments to inform the design and capacity of the site, a negligible effect is already recorded against SA objective 11: historic environment. This is because the allocation policy requires development to respect the historic integrity of the site. The minor wording clarification regarding tall builds and factual correction regarding greenspace will not alter the findings of the SA.</p>
MM39	Policy 44	<p>Amend 3rd bullet point: ...in the region of <u>about</u> 5 dwellings....</p> <p>Add new paragraph at the end of the bullet points: <u>C. Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS)</u></p>	<p>To reflect consultation response from Anglian Water.</p>	<p>More sustainable (effects score changed): This proposed Main Modification will alter the findings of the SA because maximising the use of SuDS will help mitigate against flood risk. Therefore, the significant negative effect against SA objective 14: flood risk should be upgraded to a minor negative effect. It is noted that although the use of SuDS is supported, the southern half of the site falls within Flood Zone 3, just over half of the site falls within a</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p>		moderate groundwater flood risk area and a small proportion of the site falls within a 1 in 100 year surface water flood risk area.
MM40	New Policy 45	<p>Add new site specific policy:</p> <p><u>g. Hill Farm Rise, Hunsbury Hill (LAA1100)</u></p> <p><u>13.24 The site is approximately 4.44 hectares in size and is located in Hunsbury, south west Northampton. It is surrounded by a mix of uses including the Mereway Neighbourhood Centre with Tesco Mereway, a library and a Church to the north and north east; residential to the east and west and the railway line and a Local Wildlife Site to the south/ south west.</u></p> <p><u>13.25 The site adjoins a railway line, which then runs in a tunnel (Hunsbury Hill tunnel) under part of the site. The railway forms part of the Northampton Loop Line of the West Coast Main Line. Also adjoining the site is an area which is used for railway operational purposes including access. In addition, there is a significant number of trees on the site, particularly along the border. There is a possibility that the site also has some priority habitat grassland that may require protecting. The majority of the site is also a potential wildlife site.</u></p> <p><u>13.26 The site is located within Flood Zone 1. The site is also located within 3 miles of the Strategic Road Network and any development on the site could potentially impact on the M1 and the A45.</u></p> <p>POLICY 45</p> <p>HUNSBURY FARM RISE, HUNSBURY HILL (LAA1100)</p> <p><u>Housing development of about 80 dwellings at Hunsbury Hill will be supported subject to the following criteria being met. Proposals will be required to:</u></p> <p><u>i demonstrate, through an ecological survey and landscape assessment, the opportunities and constraints offered by the existing natural environment including</u></p>		<p>New policy: This proposed Main Modification will alter the findings of the SA because a site-specific policy has been created for site LAA1100. An appraisal matrix has been produced for this new policy, which can be found in Appendix C.</p>

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		<p>the high presence of established trees, potential priority habitat grassland and potential wildlife site within the site, and how these are to be protected and/ or how any adverse impacts are to be mitigated against</p> <p>ii ensure that any proposal will be designed in a manner which is sensitive towards the presence of the Local Wildlife Site adjoining the development site including the potential to make the site more resilient to visitor pressure</p> <p>iii ensure that the operational requirements of the rail network, including access, are retained within the area shown hatched on Figure 24</p> <p>iv demonstrate, through the use of design and building materials, that adverse impacts from noise, particularly from the railway operations, will be reduced</p> <p>v improve connectivity and accessibility to the Mereway neighbourhood centre to encourage walking and cycling</p> <p>vi ensure that any proposal for this site is accompanied by a site-specific Flood Risk Assessment</p> <p>vii demonstrate, subject to detailed assessment (including an assessment of contaminated land), that any development on the site maximises the use of Sustainable Drainage Systems (SuDS) to reduce the rate of surface water run off</p> <p>viii prepare a detailed Transport Assessment that includes consideration of the impact of the scheme on the A45 and the M1.</p>		

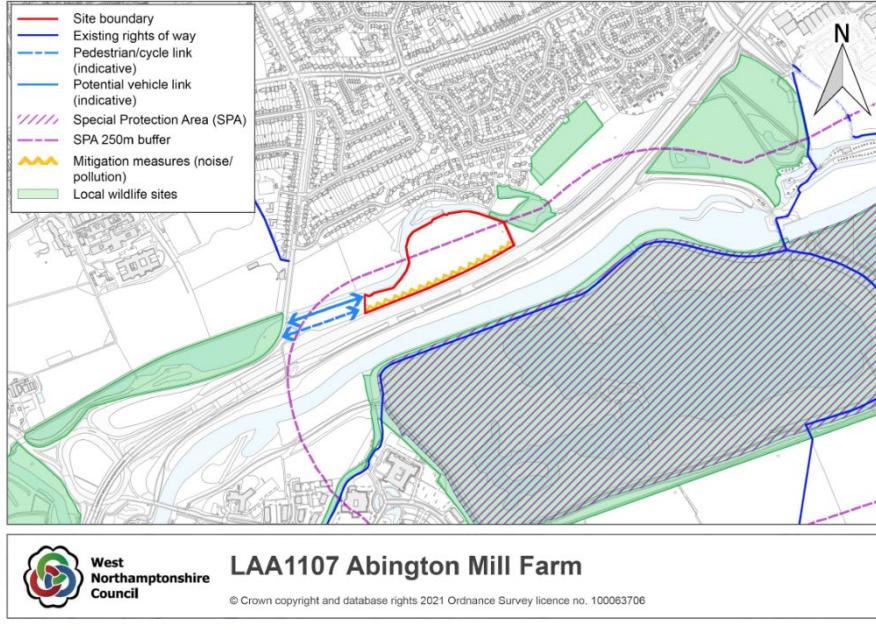
FIGURE 24: DEVELOPMENT PRINCIPLES FOR HILL FARM RISE

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined></u>	Reason for modification	Implications for the SA findings
		 <p>LAA1100 - Hill Farm Rise (area: 4.44 hectares)</p> <p>© Crown copyright and database rights 2021 Ordnance Survey licence no. 100063706</p>		
MM41	New Policy 46	Add a new site specific policy <u>h. Abington Mill Farm (LAA1107)</u> <u>13.27 Abington Mill Farm is located approximately 2 miles (3.2km) east of Northampton's town centre and is 5.02ha in size. It is an area of open land bounded by housing to the north; a sports pitch and informal parking area to the west; and additional open space, the A45 and the River Nene to the south. The site is within 5 to 10 minutes' walk of Billing Road, which is well served by buses and has cycle lanes.</u>	To reflect recommendations provided by the Planning Inspectors, to ensure that issues of access, flood risk and green	New policy: This proposed Main Modification will alter the findings of the SA because a site-specific policy has been created for site LAA1107. An appraisal matrix has been produced for this new policy, which can be found in Appendix C .

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p>13.28 Close to the site, on the south side of the A45 is the Upper Nene Valley Gravel Pits Special Protection Area and Brackmills employment area. Both are accessible from the site via an overhead bridge across the A45. To the south east of the site, and south of Bedford Road, is the Barnes Meadow Local Nature Reserve.</p> <p>13.29 The site is located mostly within Flood Zone 2 with pockets of Flood Zones 3a and 3b within the site. Flood defences have been installed around the site. Because it is close to the A45, development on this site may have an impact on the strategic road network.</p> <p>13.30 The site is also located close to one of the local green infrastructure network, of which there are 9 in total in the Northampton area. Component F is the 'Washlands and Eastern Nene' and comprises the floor of the Nene Valley from the town centre at Midsummer Meadow eastwards to the NRDA boundary. It broadly follows the Nene Valley sub-regional Corridor (Northampton to Wansford (Cambs). The Green Infrastructure Plan (2016) identifies a list of projects for each component, which can contribute towards enhancing these green infrastructure networks.</p> <p>POLICY 46</p> <p>ABINGTON MILL FARM (LAA1107)</p> <p>Abington Mill Farm will be developed for about 125 dwellings. The site will be developed in a manner consistent with the diagram shown in Figure 25 below:</p> <p>Proposals will be required to:</p> <ul style="list-style-type: none">i) <u>Include measures to mitigate against the impacts of noise and pollution from the A45 dual carriageway</u>ii) <u>Demonstrate that Provide a safe and secure access from Rushmere Road can be provided in a manner that would pass the exceptions test</u>	infrastructure/open space are addressed.	

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		<p>Wording to be deleted is struckthrough</p> <p>New wording is <u>underlined</u></p> <p class="list-item-l1">iii) <u>Include a travel plan, to demonstrate how traffic matters will be mitigated against and managed along Rushmere Road and the Barnes Meadow interchange</u></p> <p class="list-item-l1">iv) <u>Incorporate proposals to encourage cycling and walking, taking advantage of the availability of cycle routes to the south of the A45 which have access to the town centre and areas east of Northampton</u></p> <p class="list-item-l1">v) <u>Contribute to improvements to the green infrastructure network to include projects within the Washlands and Eastern Nene corridor, such as the Upper Nene Valley Gravel Pits and Barnes Meadow Local Nature Reserve</u></p> <p class="list-item-l1">vi) <u>Maximise the use of Sustainable Drainage Systems (SuDS) to reduce the rate of surface water run-off</u></p> <p class="list-item-l1">vii) <u>Include 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 allowance for climate change to protect against fluvial flooding</u></p>		

FIGURE 25: DEVELOPMENT PRINCIPLES FOR ABINGTON MILL FARM

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
		 <p>LAA1107 Abington Mill Farm <small>© Crown copyright and database rights 2021 Ordnance Survey licence no. 100063706</small></p>		
		Chapter 14: Implementation and Monitoring Framework		
MM42		Changes as set out in Appendix 3	To reflect changes in the main content of the plan.	No change to SA findings: This proposed Main Modification will not alter the findings of the SA as it relates to Appendix 4 of the Local Plan Part 2, which was not subject to SA.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording Wording to be deleted is struckthrough New wording is <u>underlined</u>	Reason for modification	Implications for the SA findings
MM43	Glossary	Add: Functionally linked land <u>Any land outside of the European designated site which is used by species that are qualifying interest features of that designated site</u> Playing pitches <u>Pitches for playing sports covering football, cricket, rugby, hockey, rugby league and baseball.</u> Sports facilities <u>Includes sports hall, swimming pools, health and fitness, athletics, squash, gymnastics, bowls, tennis, golf, village and community halls, cycling, netball, judo, countryside and water sports, rowing, canoeing and orienteering.</u> Non-statutory nature conservation site <u>An area of land designated for its nature conservation value but which does not receive statutory protection. Some non-statutory sites may however receive a degree of protection under national or local policy. In Northamptonshire these sites include Local Wildlife Sites (LWS), Local Geological Sites (LGS), Potential Wildlife Sites (PWS) and Protected Wildflower Verges (PWV).</u>	To clarify terms used in the plan.	No change to SA findings: This proposed Main Modification will not alter the findings of the SA as it relates to a new glossary that would not be subject to SA.
		Appendix A: Northampton housing trajectory for sites allocated in the Local Plan Part 2 (excluding sustainable urban extensions)		
MM44	175	See table attached at Appendix 2 to this document.		No change to SA findings: This proposed Main Modification will not alter the findings of the SA as it relates to Appendix 2 of the Local Plan Part 2, which provides a factual update on the number of homes being delivered.

Reference	Policy/ Paragraph	Suggested Modification to Policy Wording	Reason for modification	Implications for the SA findings
		Wording to be deleted is struckthrough New wording is <u>underlined</u>		
		Appendix B: Superseded Policies		
MM45	182	See tables attached at Appendix 4 to this document.		No change to SA findings: This proposed Main Modification will not alter the findings of the SA as it relates to Appendix B of the Local Plan Part 2, which was not subject to SA.
		Appendix D: Transport and Infrastructure Schedule		
MM46	191	Change the 'Sub Total NRDA Transport Infrastructure Known Costs': £155.47 <u>£148.22m</u>	Original total was incorrect	No change to SA findings: This proposed Main Modification will not alter the findings of the SA as it relates to Appendix D of the Local Plan Part 2, which was not subject to SA. However, Policy 32: Designing Sustainable Transport and Travel was subject to SA and makes reference to Appendix D (see MM31).
		Appendix G: Primary Education		
MM47	194	Remove line E41 - new three form entry primary school in Collingtree Remove line E42 – new two form entry primary school in Duston	Schools have been removed from the programme	No change to SA findings: This proposed Main Modification will not alter the findings of the SA as it relates to Appendix G of the Local Plan Part 2, which was not subject to SA.

APPENDIX 1 – Proposed Modifications to Policy 13 – MM 13

POLICY 13

RESIDENTIAL AND OTHER RESIDENTIAL LED ALLOCATIONS

The following sites are allocated for residential and/or residential led development. The capacities identified are indicative only and are dependent on compliance with other policies in this and other development plan documents. Other policies of particular relevance in this plan (non exhaustive) are indicated

Reference	Location	Indicative Dwelling Capacity	Relevant policies (non-exhaustive)	Reason for change (this column will not be included in the adopted plan)
0168	Rowtree Road	131		Combined with other sites into LAA 1144
0171	Quinton Road	19-14	<u>Policy 7 - Flood risk and Water Management</u>	Capacity reduced as a result of the Flood Risk Assessment.
0174	Ransome Road Gateway	24	<u>Policy 7</u> <u>Policy 31</u> <u>BN5 of the West Northamptonshire Joint Core Strategy</u> <u>BN9 of the West Northamptonshire Joint Core Strategy</u>	
0193	Former Lings Upper School, Birds Hill Walk	60 (5YHLS)		Site removed from five-year housing land supply because no evidence it is deliverable in that time.
0195	Hunsbury School, Hunsbury Hill	73 (50 in HLS) <u>38</u>		Removed because housing on this site has been completed.
0204	The Farm, Hardingstone	100 <u>55</u>	<u>Policy 30</u> <u>Policy 31</u> <u>BN5 of the West Northamptonshire Joint Core Strategy</u>	To correct error regarding capacity.

0205	Parklands Middle School, Devon Way	132 (5YHLS)		Removed from allocation as site is currently an Amenity Green Space typology and site is currently under construction
0288*	Northampton Railway Station car park	68 (5YHLS) 280	<u>Policy 39</u> <u>Policy 31</u> <u>BN5 of the West Northamptonshire Joint Core Strategy</u>	To reflect revised capacity agreed in SOCG.
0333*	Northampton Railway Station (railfreight)	200 <u>188</u>	<u>Policy 7</u> <u>Policy 39</u> <u>Policy 31</u> <u>BN5 of the West Northamptonshire Joint Core Strategy</u>	Capacity reduced as a result of the Flood Risk Assessment.
0335	Chronicle and Echo North	42 (6 in 5YHLS)	<u>Policy 31</u> <u>BN5 of the West Northamptonshire Joint Core Strategy</u>	
0336	Chronicle and Echo South (rear of Aldi)	14 (5YHLS)		Site was completed in 20/21.
0338	Countess Road	68 (64 in 5YHLS) Net:4		Conversion is underway for 68 units
0403	Allotments Studland Road	23		Removed from allocation as site is currently an allotment typology
0629	British Timken	138 (5YHLS) <u>121</u>		Site is under construction, 15 units complete, 121 units remaining as at 1 st April 2021
0657	Fraser Read	140		Removed from allocation as site is currently an Amenity Green Space typology
0685	Adj 12 Pennycress Place, Ecton Brook Road	12		Removed from allocation as site is currently an Amenity Green Space typology
0719	Car garage workshop, Harlestone Road	35	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	

0720	Ryland Soans garage, Harlestone Road	62	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	
0767	Spencer Street	25 (5YHLS)	<u>Policy 7</u>	
0903	Hawkins Shoe Factory, Overstone Road	105 (5YHLS)	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	
0910	379 Harlestone Road	14		
0932	Site 1 Southbridge Road	45 (5YHLS)	<u>Policy 7</u>	
0933	Site 2 Southbridge Road	<u>28</u> 50 (5YHLS)	<u>Policy 7</u>	To better reflect capacity
1006	Pineham	<u>80</u> 106	<u>Policy 7</u>	To reflect capacity of current planning application.
1007	Land south of Wooldale Road, east of Wootton Road	<u>16</u> 22	<u>Policy 7</u>	Capacity reduced as a result of the Flood Risk Assessment.
#009	Land west of Policy N5 Northampton South SUE (site 1)	100		Combined with other sites into LAA 1144
1010	Land at St Peter's Way/ Court Road/ Freeschool Street	5	<u>Policy 31</u> <u>BN5 of the West Northamptonshire Joint Core Strategy</u>	
1013	University of Northampton Park Campus	<u>585</u> 653 (5YHLS)		To reflect remaining capacity as at 1 st April 2021.
1014	University of Northampton Avenue Campus	<u>170</u> 200		To reflect capacity of current planning application.
1022	Belgrave House	<u>122</u> 99 (5YHLS)	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	To reflect capacity of planning permission
1025	Land to the west of Towcester Road	<u>180</u> 230	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	Increased capacity agreed in Statement of Common Ground.
1026	Eastern land parcel, Buckton Fields	14	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	

1036	Derwent Drive garage site, Kings Heath	8-5		Permission granted for 5 units
1037	Swale Drive garage site and rear/ unused land	6 (5YHLS)		Site was completed in 20/21.
1041	Newnham Road, Kingsthorpe	15		Removed from allocation as site is currently an Amenity Green Space typology
1048	Stenson Street	6 2	<u>Policy 7</u>	Permission granted for 2 units
1049	Land off Arbour Court, Thorplands garage block	11 6		Permission granted for 6 units
1051a	Land between Waterpump Court and Billing Brook Road	8		Site was completed in 20/21.
1052	Land rear of garages in Coverack Close	13		
1058	Land off Oat Hill Drive, Ecton Brook	11		Removed from allocation as site is currently an Amenity Green Space typology
1060	Hayeswood Road, Lings	6		Removed from allocation as site is currently an Amenity Green Space typology and site is currently under construction
1071	2 sites off Medway Drive, near Meadow Close	9		
1086a	2 parcels of land in Sunnyside Estate (Cosgrove Road)	6		
1086b	2 parcels of land in Sunnyside Estate (Chalcombe Avenue)	7		
1094	Land off Holmeross Road	15		Removed from allocation as site is currently an Amenity Green Space typology

1096	Land off Mill Lane	14	Policy 31 BN5 of the West Northamptonshire Joint Core Strategy	
1097	Gate Ledge	30		Removed from allocation as site is currently an Amenity Green Space typology
1098*	The Green, Great Houghton	800 (A minimum of 225 of which will be provided within the plan period)	Policy 41 Policy 30 Policy 31 BN5 of the West Northamptonshire Joint Core Strategy	To identify what proportion of the allocation will be completed within the plan period.
1099	Upton Reserve site	40		Site is deleted because of flood risk issues
1100	Hill Farm Rise, Hunsbury Hill (50% of the site)	80	Policy 29 Policy 45	
1102	Site east of Towcester Road	60	Policy 29	
1104	Watering Lane, Collingtree	265 (A minimum of 200 of which will be provided within the plan period)	BN9 of the West Northamptonshire Joint Core Strategy	To identify what proportion of the allocation will be completed within the plan period.
1107	Former Abington Mill Farm, land off Rushmere Road	125	Policy 7 Policy 29 Policy 30 Policy 45	
1108	Former Dairy Crest depot, Horsley Road	35		
1109	Mill Lane	6 (5YHLS)	Policy 31 BN5 of the West Northamptonshire Joint Core Strategy	
1113*	Greyfriars	400 (delivery could be post plan period)	BN9 of the West Northamptonshire Joint Core Strategy Policy 42	Part removed from allocation as part of site is currently an Amenity Green Space typology

1114	Cedarwood Nursing Home, 492 Kettering Road	2 (5YHLS) <u>31</u>		Scheme under construction for 56 bed care home, equates to 31 dwellings.
1117	133 Queens Park Parade	6 (5YHLS) <u>8</u>		Permission granted for 8 units
1121	Upton Valley Way East	34 (5YHLS)		Removed from allocation as site is currently an Amenity Green Space typology and site is currently under construction
1123	83-103 Trinity Avenue	9 (5YHLS)		
1124	41 – 43 Derngate	7 (5YHLS) <u>31</u>	<u>Policy 31</u> <u>BN9 of the West Northamptonshire Joint Core Strategy</u>	Permission granted for 31 units
1126	5 Primrose Hill	6 (5YHLS)	<u>Policy 31</u> <u>BN9 of the West Northamptonshire Joint Core Strategy</u>	
1127	32 Connaught Street	6		Included in error
1131	The Leys Close, 39 Mill Lane	6 <u>3</u>	<u>Policy 31</u> <u>BN9 of the West Northamptonshire Joint Core Strategy</u>	To reflect remaining capacity as at 1 st April 2021.
1133	Eastern District Social Club	5 (5YHLS)	<u>Policy 29</u>	
1134	St John's Railway Embankment	12	<u>Policy 29</u>	
1137	Wootton Fields	74		
1138	Land south of Bedford Road	7		Site has failed the Flooding Exceptions test.
1139*	Ransome Road	200 (500 in 5YHLS) <u>500</u> (A minimum of 224 of which will be provided within the plan period)	<u>Policy 43</u> <u>Policy 31</u> <u>BN5 of the West Northamptonshire Joint Core Strategy</u>	To identify what proportion of the allocation will be completed within the plan period.
1140	Land north of Milton Ham	224	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	

1142	Land west of Northampton South SUE (site 2)	130		Combined with other sites into LAA 1144
1144	<u>Land to the west of Northampton South Sustainable Urban Extension</u>	361 (A minimum of 90 of which will be provided within the plan period)	<u>BN9 of the West Northamptonshire Joint Core Strategy</u>	This is the combination of LAA 0168, 1009 and 1142 into one allocation. The policy identifies what proportion of the allocation will be completed within the plan period.

Delete last sentence 'Development proposals marked..... and material considerations'.

Appendix B

Sustainability Appraisal matrices for development management policies

Policy 29A: Supporting and Enhancing Biodiversity

Summary of policy options:			
SA Objective	Policy 29A		
SA1: Housing	0		
SA2: Sustainable Travel	0		
SA3: Schools	0		
SA4: Health and Well-being	+		
SA5: Crime	0		
SA6: Economy	0		
SA7: Town Centre	0		
SA8: Climate Change Mitigation	0		
SA9: Biodiversity & Geodiversity	++		
SA10: Landscapes & Townscapes	+		
SA11: Historic Environment	0		
SA12: Air Quality	0		
SA13: Water Management	0		
SA14: Flood Risk	0		
SA15: Soils & Minerals	0		
SA16: Waste Management	0		

SA Findings

B.1 Significant positive effects are expected in relation to SA objective 9 as this policy requires all development proposals to provide a net gain in biodiversity, through the creation or enhancement of habitats. There is also an expectation for proposals to enhance natural capital and be designed around

the existing components of the ecological network, including sites of national or international importance, sites of local importance and other biodiversity assets.

B.2 Minor positive effects are also expected in relation to SA objectives 4 and 10, as protecting and enhancing biodiversity will help to protect the biodiversity sites as recreational and landscape assets.

Policy 29B: Nature Conservation

Summary of policy options:			
SA Objective	Policy 29B		
SA1: Housing	0		
SA2: Sustainable Travel	0		
SA3: Schools	0		
SA4: Health and Well-being	+		
SA5: Crime	0		
SA6: Economy	0		
SA7: Town Centre	0		
SA8: Climate Change Mitigation	0		
SA9: Biodiversity & Geodiversity	++		
SA10: Landscapes & Townscapes	+		
SA11: Historic Environment	0		
SA12: Air Quality	0		
SA13: Water Management	0		
SA14: Flood Risk	0		
SA15: Soils & Minerals	0		
SA16: Waste Management	0		

SA Findings

B.3 Significant positive effects are expected in relation to SA objective 9 as this policy requires development to protect, maintain and enhance biodiversity and geodiversity. If a proposal is likely to affect biodiversity, then there is an expectation that this impact will be assessed through an ecological assessment. The policy states that if harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for, planning permission will be refused. Particular reference is given to sites of national or international importance (e.g. The Upper Nene Valley Gravel Pits SPA, Ramsar Site and SSSI), sites of local importance and other biodiversity assets.

B.4 Minor positive effects are also expected in relation to SA objectives 4 and 10, as protecting and enhancing biodiversity will help to protect the biodiversity sites as recreational and landscape assets.

Policy 30: Upper Nene Valley Gravel Pits Special Protection Area

Summary of policy options:			
SA Objective	Policy 30		
SA1: Housing	0		
SA2: Sustainable Travel	0		
SA3: Schools	0		
SA4: Health and Well-being	+		
SA5: Crime	0		
SA6: Economy	0		
SA7: Town Centre	0		
SA8: Climate Change Mitigation	0		
SA9: Biodiversity & Geodiversity	++		
SA10: Landscapes & Townscapes	+		
SA11: Historic Environment	0		
SA12: Air Quality	0		
SA13: Water Management	+		
SA14: Flood Risk	0		
SA15: Soils & Minerals	0		
SA16: Waste Management	0		

SA Findings

B.5 Significant positive effects are expected in relation to SA objective 9. This is because developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits SPA, must satisfy the requirements of the Habitats Regulations by determining site-specific impacts and avoiding or mitigating these impacts. Where development is likely to have significant effects on the SPA, a Habitats Regulations Assessment is required and may include the need for an Appropriate Assessment. Early consultation with Natural England is also encouraged, in addition to having regard to the Upper Nene Valley Gravel Pits SPA Supplementary Planning Document (SPD).

B.6 Applications comprising a net gain in residential units within 3km of the SPA will, in combination, have an adverse effect on the integrity of the SPA if not mitigated. West Northamptonshire Council has adopted a mitigation strategy for Unit 1 of the Upper Nene Valley Gravel Pits SPA, which must be referred to when preparing an application that is located within 3km of Unit 1 of the SPA.

B.7 The policy states that residential development will be required to pay a Strategic Access Management and Monitoring (SAMM) contribution and/or provide bespoke mitigation such as Suitable Alternative Natural Greenspace (SANG) in order to mitigate recreational impact. Additionally, sites that could potentially be functionally linked to land associated with the SPA will need to undertake overwintering

bird surveys, ahead of submitting a planning application. Development within 250m of the SPA must also protect sightlines for SPA birds.

B.8 A minor positive effect is expected in relation to SA objective 13: water management because major developments are required to demonstrate that there is sufficient capacity at the receiving Water Recycling Centre to ensure water quality is protected.

B.9 Minor positive effects are also expected in relation to SA objectives 4: health and well-being and 10: landscapes and townscapes, as protecting and enhancing biodiversity helps to protect the biodiversity sites as recreational and landscape assets.

Appendix C

Sustainability Appraisal matrices for site-specific allocation policies

Policy 41: The Green, Great Houghton (LAA1098)

Summary of policy			
Housing development of up to 800 dwellings.			
SA Objective	SA Sub-Objective	Initial SA assessment of LAA1098 ³⁸	Main Modifications Assessment
SA1: Housing	SA1a (Housing)	++	++
SA2: Sustainable Travel	SA2a (Sustainable transport links)	-	+
	SA2b (Services and facilities)	+	
SA3: Schools	SA3a (Schools)	-	-
SA4: Health and Well-being	SA4a (Healthcare facilities)	-	+/-
	SA4b (Open space and sports facilities)	+	
	SA4c (Air quality and noise)	0	
SA5: Crime	SA5a (Crime)	0	0
SA6: Economy	SA6a (Economy)	0	0
SA7: Town Centre	SA7a (Town centres)	0	0
SA8: Climate Change Mitigation	SA8a (Sustainable transport links)	-	+
	SA8b (Services and facilities)	+	
SA9: Biodiversity & Geodiversity	SA9a (Designated sites)	--	-
SA10: Landscapes & Townscapes	SA10a (Brownfield land and open space)	-	+/-
SA11: Historic Environment	SA11a (Heritage significance)	?	0
SA12: Air Quality	SA12a (AQMAs)	-?	-?
SA13: Water Management	SA13a (SPZs and contaminated land)	0	+
SA14: Flood Risk	SA14a (Flood risk from rivers)	0	+
	SA14b (Flood risk from groundwater)	0	

³⁸ The original 'policy-off' appraisal of site LAA1098, as reported in Chapter 6 of the Proposed Submission (Round 2) SA Report.

Summary of policy			
	SA14c (Surface water flood risk)	0	
SA15: Soils & Minerals	SA15a (Brownfield land)	0	
	SA15b (Greenfield land)	--	
	SA15c (Agricultural land)	--	
	SA15d (Minerals)	-?	
	SA15e (Land instability)	0	
	SA16a (Waste)	--?	--?
SA16: Waste Management			

SA findings

C.1 Significant positive effects are expected in relation to SA objective 1: housing as this development site will deliver about 800 homes helping cater to the needs of Northampton's growing population.

C.2 Minor positive effects are expected in relation to SA objectives 2: sustainable travel and 8: climate change mitigation. Although the site is only in proximity to one type of sustainable transport link, the minor negative effect is not carried through to the SA score for the allocation policy due to the policy requirements for development to provide suitable transport links to neighbouring developments, including neighbourhood centres and community facilities and improved pedestrian and cycling connections to the employment area to the north and the proposed residential areas to the west and to Great Houghton (as also indicated in supporting design principles in the Figure supporting this policy). The site is also within 2000m of an existing employment area. As such, the location of this residential site could help to facilitate sustainable modes of travel and minimise greenhouse gas emissions.

C.3 Minor negative effects are expected in relation to SA objective 3: schools as this site is not within walking distance of primary schools.

C.4 Mixed significant positive and minor negative effects are expected in relation to SA objective 4: health and well-being as the site is more than 800m from a healthcare facility but within 800m of open space, including Brackmills Country Park adjacent to the north of site which the policy seeks to improve connections to. Further to this, the policy seeks to secure a Suitable Alternative Natural Greenspace (SANG), which will provide greater accessibility to the outdoors with the potential to increase levels of recreation.

C.5 Minor negative effects are expected in relation to SA objective 9: biodiversity and geodiversity. The site is within the 3km zone of influence of the Upper Nene Valley Gravel Pits SPA, Ramsar Site and SSSI for recreational disturbance. Although any residential development within 3km of the designated site has the potential to contribute to visitor pressure, Policy 41, as modified, requires Suitable Alternative Natural Greenspace (SANG) to be secured on and/or adjoining LAA1098. It also sets out design principles that should ensure the SANG is effective in attracting residents to use it for recreation, including dog-walking. In addition, approximately two thirds of the site (to the north and east) contains land identified by earlier survey work³⁹ as optimal supporting habitat for the Golden Plover population of Upper Nene Valley Gravel Pits, with most of the remainder of the site containing sub-optimal habitat for the Golden Plover. However, Policy 41 requires winter surveys to be undertaken in order to determine whether the site is used by over-wintering Golden Plover/Lapwing and whether it acts as functionally linked land to the SPA. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat. As a result of the mitigation within Policy 41, the potential significant negative effects in relation to SA objective 9 identified by the policy-off site appraisal are reduced to minor negative for the policy alone. These issues were considered in more detail in the HRA which concluded that the Local Plan Part 2 alone or in-combination would not result in adverse effects on the integrity of the Upper Nene Valley Gravel Pits SPA and Ramsar Site. The HRA notes that further mitigation is provided by Policy 30 and the recreation mitigation strategy that forms an appendix to the Upper Nene Valley Gravel Pits SPD.

C.6 Mixed minor effects are expected in relation to SA objective 10: landscapes and townscapes. Although the site is greenfield land, policy text and supporting design principles

³⁹ Survey Work to Support the Appropriate Assessment for the West Northamptonshire Joint Core Strategy, Environ UK Ltd, 2010.

outlined in the Figure supporting this policy indicate that a significant area in the north-east of the site will be subject to ecological enhancement, which is also likely to benefit the landscape. The development will not lead to any loss of designated open space. Potential negative effects on townscape are mitigated by the policy requirements for proposals 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 Hardingtonstone to the west, with special regard to Hardingtonstone Lodge. The policy also specifically requires proposals for the site to be accompanied by a landscape vision for the site, including details of how views across the site into and out of the village of Great Houghton will be managed. The location and layout of the SANG is to also assist in achieving the landscape vision for the site.

C.7 Prior to drafting of the allocation policy, uncertain effects were assessed by NBC (now known as WNC) in relation to SA objective 11: historic environment. The form of development has potential to impact on heritage assets. The setting of listed buildings (including views) will need to be taken into consideration as will the character of the conservation area, in any development proposals. There is potential to impact adversely on setting/character causing harm to heritage assets. However, mitigation is provided by the policy which requires the scheme to be of high quality design and take into account and be sensitive to the significance and the setting of the Great Houghton conservation area, evident through a Heritage Impact Assessment. Additionally, proposals are to be accompanied by a landscape vision for the site, including details of how views across the site into and out of the village of Great Houghton, and especially views of the Grade II* listed church, will be managed. This mitigation results in a negligible effect overall.

C.8 Minor negative effects are expected in relation to SA objective 12: air quality as the large nature of this site could

lead to a significant increase in commuters by car occupying the Northampton road network leading to air pollution around Northampton. However, it appears unlikely from 2011 Census data and layout of road network that a significant number of car commuters from the area of this site would be likely to pass through an AQMA. In addition, the policy states that any proposal that comes forward should include suitable measures to mitigate the impact of additional traffic generated by the development. However, effects are uncertain as the actual routes that will be used by new residents are unknown and the actual implementation of effective suitable mitigation measures is unclear. Potential adverse air quality effects from the nearby Brackmills Industrial Estate are mitigated by the policy requirement for any proposal to include an air quality assessment.

C.9 Minor positive effects are expected in relation to SA objectives 13: SPZs and contaminated land and 14: flood risk because development of the site is required to maximise the use of Sustainable Drainage Systems, which can help limit surface water runoff at the same time as protecting water quality.

C.10 Significant negative effects are expected in relation to SA objective 15: soils and minerals as the site contains significant amounts (more than 1ha) of greenfield land and Grade 2 (Very Good) agricultural land. Furthermore, the southern part of the site is located within a Sand and Gravel safeguarding area.

C.11 Significant negative effects with uncertainty are expected in relation to SA objective 16: waste management as the north-western fringe of the site is partially within 300m of an industrial area in which the MLP considers waste management uses to be acceptable, with potential adverse effects on residential amenity.

C.12 Negligible effects are expected in relation to the remaining SA objectives.

Policy 42: Greyfriars (LAA1113)

Summary of policy				
Proposals for high density mixed use development.				
SA Objective	SA Sub-Objective	Initial SA assessment (LAA1113r)	Initial SA assessment (LAA1113c)	Proposed Submission Local Plan Assessment
SA1: Housing	SA1a (Housing)	++	0	++
SA2: Sustainable travel	SA2a (Sustainable transport links)	++	++	++
	SA2b (Services and facilities)	++	N/A	
SA3: Schools	SA3a (Schools)	++	0	++
SA4: Health and well-being	SA4a (Healthcare facilities / Sensitive receptors)	+	-?	+/-
	SA4b (Open space and sports facilities)	++	N/A	
	SA4c (Air quality and noise)	0	N/A	
SA5: Crime	SA5a (Crime)	0	0	0
SA6: Economy	SA6a (Economy / Employment)	0	++	++
SA7: Town Centre	SA7a (Town centres)	?	?	++
SA8: Climate change mitigation	SA8a (Sustainable transport links)	++	++	++
	SA8b (Services and facilities)	++	N/A	
SA9: Biodiversity & geodiversity	SA9a (Designated sites)	--	0	--
SA10: Landscapes & townscapes	SA10a (Brownfield land and open space)	N/A		++
SA11: Historic environment	SA11a (Heritage significance)	-	-	0
SA12: Air quality	SA12a (AQMAs)	-?	-?	-?
SA13: Water management	SA13a (SPZs and contaminated land)	-?	-?	-?
SA14: Flood risk	SA14a (Flood risk from rivers)	0	0	0
	SA14b (Flood risk from groundwater)	0	0	

Summary of policy				
	SA14c (Surface water flood risk)	-	-	
SA15: Soils & minerals	SA15a (Brownfield land)	+	+	+
	SA15b (Greenfield land)	0	0	
	SA15c (Agricultural land)	0	0	
	SA15d (Minerals)	0	0	
	SA15e (Land instability)	0	0	
SA16: Waste management	SA16a (Waste)	0	0	0

SA Findings

C.13 Significant positive effects are expected in relation to SA objective 1: housing as the allocation will facilitate the creation of a high-density, high quality housing development, which will help to deliver Northampton's identified housing need.

C.14 Significant positive effects are expected in relation to SA objectives 2: sustainable travel and 8: climate change mitigation as the site is in proximity to three types of sustainable transport links. The site is also within Northampton Town Centre, and within 2,000m of employment areas and local centres. As such, the location of this mixed-use site could help to reduce the need to travel within, to and from Northampton by providing easy access to jobs, services and facilities and to sustainable travel alternatives.

C.15 Significant positive effects are expected in relation to SA objective 3: schools as the site is within walking distance of the Northampton International Academy Secondary School and the western half of the site is within 500m of primary schools.

C.16 Mixed significant positive and minor negative effects are expected in relation to SA objective 4: health and well-being. Positive effects arise from the site being within 800m of sports facilities and open space, including Wellington St Amenity Greenspace located across the road to the east of site, and within walking distance of a healthcare facility. However, development of the site would lead to the loss of Lady's Lane Amenity Green Space and the policy and supporting development principles figure do not indicate that any green space will be conserved or provided. Note that the minor negative effect within uncertainty assigned to employment use of the site was an assumption for all smaller employment sites in the absence of qualitative assessment. However, the allocation policy stipulates town centre uses and this form of employment development would be unlikely to negatively

affect nearby residential development or other sensitive receptors.

C.17 Significant positive effects are expected in relation to SA objectives 6: economy and 7: town centre as the site will incorporate town centre development, as well as residential development which complements, expands and seeks to enhance the town centre. As such the development will increase the availability of jobs and growth of Northampton's economy. It will also serve to increase the vitality of the town centre such as through provision of active frontages, as required by the allocation policy criteria and shown in the design principles Figure supporting this policy.

C.18 Significant negative effects are expected in relation to SA objective 9: biodiversity and geodiversity as the site is within the 3km zone of influence of the Upper Nene Valley Gravel Pits SPA, Ramsar Site and SSSI for recreational disturbance. This issue was considered in more detail in the HRA which concluded that the Local Plan Part 2, alone or in-combination, would not result in adverse effects on the integrity of the Upper Nene Valley Gravel Pits SPA and Ramsar Site.

C.19 Significant positive effects are expected in relation to SA objective 10: landscapes and townscapes as the policy requires development of this site to be of high quality design and include the creation of key, unique landmark buildings that reflect the location of this site and Northampton town centre. As such, this policy could help to enhance the quality and character of Northampton's townscape.

C.20 The site could accommodate medium to high density development, as long as particular attention is given to the setting of listed buildings along Sheep Street. Therefore, potential minor negative effects are identified in relation to this SA objective. However, the allocation policy requires development to be well related, sympathetic and responsive to

the character and heritage assets of the surrounding areas. In light of this mitigation, the potential effects of the allocation are judged to be negligible.

C.21 Minor negative effects with uncertainty are expected in relation to SA objective 12: air quality as it appears likely from 2011 census data and the layout of the road network that a significant proportion of car commuters to and from the site would pass through Zone 6 Campbell Square AQMA, Zone 8 St Michael's Road AQMA and Zone 2 Victoria Promenade AQMA and the allocation policy provides for vehicle parking. However, these effects are uncertain since they are subject to the routes actually used and the degree to which modes of sustainable travel are used. Some mitigation is provided by the policy requirement for any application to demonstrate how it will improve air quality in the surrounding area.

C.22 Minor negative effects are expected in relation to SA objective 13: water management as parts of the site contain contaminated land, which could have minor negative effect on groundwater quality. However, these effects are uncertain

subject to the protective measures taken during construction and operation, and the nature of any land contamination. In this regard it is notable that the policy requires any proposal to be accompanied by an assessment of contaminated land, albeit that this is mentioned in connection with the potential for implementing SuDS rather than the risk to groundwater quality.

C.23 Negligible effects are expected in relation to SA objective 14: flood risk because although a small proposition of the site is within a 1 in 100 year surface water flood risk area, the allocation policy states that development on this site should maximise the use of Sustainable Drainage Systems (SuDS) to reduce the rate of surface water run-off.

C.24 Minor positive effects are expected in relation to SA objective 15: soils and minerals as the majority of the site contains previously developed land.

C.25 Negligible effects are expected in relation to the remaining SA objectives.

Policy 45: Abington Mill Farm (LAA1107)

Summary of policy			
On site LAA1107, the Council will support the delivery of about 125 dwellings.			
SA Objective	SA Sub-Objective	Initial SA assessment (LAA1107)	Main Modifications Assessment
SA1: Housing	SA1a (Housing)	++	++
SA2: Sustainable Travel	SA2a (Sustainable transport links)	-	++
	SA2b (Services and facilities)	++	
SA3: Schools	SA3a (Schools)	-	-
SA4: Health and Well-being	SA4a (Healthcare facilities/Sensitive receptors)	+	+/-
	SA4b (Open space and sports facilities)	+	
	SA4c (Air quality and noise)	-	
SA5: Crime	SA5a (Crime)	0	0
SA6: Economy	SA6a (Economy/Employment)	0	0
SA7: Town Centre	SA7a (Town centres)	0	0
SA8: Climate Change Mitigation	SA8a (Sustainable transport links)	-	++
	SA8b (Services and facilities)	++	
SA9: Biodiversity & Geodiversity	SA9a (Designated sites)	--	--/+
SA10: Landscapes & Townscapes	SA10a (Brownfield land and open space)	--	--/+
SA11: Historic Environment	SA11a (Heritage significance)	?	-?
SA12: Air Quality	SA12a (AQMAs)	-?	-?
SA13: Water Management	SA13a (SPZs and contaminated land)	0	0
SA14: Flood Risk	SA14a (Flood risk from rivers)	--	-
	SA14b (Flood risk from groundwater)	-	
	SA14c (Surface water flood risk)	-	
SA15: Soils & Minerals	SA15a (Brownfield land)	0	--
	SA15b (Greenfield land)	--	
	SA15c (Agricultural land)	-	
	SA15d (Minerals)	--?	
	SA15e (Land instability)	0	

Summary of policy			
SA16: Waste Management	SA16a (Waste)	0	0

SA Findings

C.26 Significant positive effects are expected in relation to SA objective 1: housing as this policy supports the delivery of 125 dwellings on site LAA1107, and will therefore help to deliver Northampton's identified housing need.

C.27 Significant positive effects are expected in relation to SA objectives 2: sustainable travel and 8: climate change mitigation. Although the site is only in close proximity to one type of sustainable transport link, the minor negative effect is not carried through to the SA score for the allocation policy due to the policy requirement for development to incorporate proposals to encourage walking and cycling, taking advantage of the availability of cycle routes to the south of the A45 which have access to the town centre and areas east of Northampton.

C.28 Minor negative effects are expected in relation to SA objective 3: schools because the site is not within walking distance of a primary school but is within 2,000m of a secondary school.

C.29 Mixed minor positive and minor negative effects are expected in relation to SA objective 4: health and well-being. Positive effects arise from the site being within 800m of open space, and within walking distance of a healthcare facility. However, development of the site would lead to the partial loss of Rushmere Road/Rille Nene Greenspace and the policy does not indicate that any greenspace will be conserved or provided. Further to this, the site falls within 50m of the A45 and so residents could be adversely affected by noise pollution.

C.30 Mixed significant negative and minor positive effects are expected in relation to SA objective 9: biodiversity and geodiversity. This is because although the site is within the 3km zone of influence of the Upper Nene Valley Gravel Pits SPA, Ramsar site and SSSI, and directly adjacent to the Abington Old Millpond Local Wildlife Site, the policy requires contributions to be made to improvements to the green infrastructure network to include projects within the Washlands and Eastern Nene corridor – which includes the Upper Nene Valley Gravel Pits SPA, Ramsar site and SSSI.

C.31 Mixed significant negative and minor positive effects are expected in relation to SA objective 10: landscapes and townscapes, because development of this site will result in the loss of some of the Former Abington Mill Farm Natural and Semi-Natural Greenspace. However, as mentioned already the policy requires contributions to be made to improvements

to the green infrastructure network, including projects within the Washlands and Eastern Nene Corridor.

C.32 With regard to the historic environment, uncertain effects were assessed by NBC (now known as WNC) in relation to SA objective 11: historic environment. According to the Site Allocation Heritage Impact Assessment (2020), the site is considered to have medium sensitivity and therefore minor negative but uncertain effects are identified in relation to this SA objective. The uncertainty relates to the fact that the development design and layout are unknown until specific proposals come forward.

C.33 Minor negative effects are expected in relation to SA objective 12: air quality because it appears likely from 2011 Census data and the layout of the road network, that a number of commuters from the area of this site could pass through an AQMA. However, it is noted that the policy requires proposals to include measures to mitigate against the impacts of noise and pollution from the A45 dual carriageway. The effects are recorded as uncertain as the actual routes that will be used by new residents are unknown, and the actual implementation of effective suitable mitigation measures is unclear. It is noted that there is also a requirement under the policy to encourage walking and cycling, which would help minimise air pollution associated with use of the private car.

C.34 Minor negative effects are expected in relation to SA objective 14: flood risk, as almost the entire site falls within Flood Zone 3. Furthermore, a large proportion of the site falls within a moderate ground water flood risk area, in addition to the site containing land with a 1 in 100 year risk of surface water flooding. However, the policy requires proposals to maximise the use of Sustainable Drainage Systems, to reduce the rate of surface water run-off. There is also a requirement for a site-specific Flood Risk Assessment to be undertaken and it is acknowledged that 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 years, plus allowance for climate change to protect against fluvial flooding.

C.35 Significant negative effects are expected in relation to SA objective 15: soils and minerals because the site contains more than 1ha of greenfield land and is entirely located within a Sand and Gravel Safeguarding Area.

C.36 Negligible effects are expected in relation to the remaining SA objectives.

Policy 46: Hill Farm Rise, Hunsbury Hill (LAA1100)

Summary of policy			
On site LAA1100, the Council will support the delivery of about 80 dwellings.			
SA Objective	SA Sub-Objective	Initial SA assessment (LAA1100)	Main Modifications Assessment
SA1: Housing	SA1a (Housing)	+	+
SA2: Sustainable Travel	SA2a (Sustainable transport links)	+	++
	SA2b (Services and facilities)	++	
SA3: Schools	SA3a (Schools)	++	++
SA4: Health and Well-being	SA4a (Healthcare facilities/Sensitive receptors)	-	+/-
	SA4b (Open space and sports facilities)	++	
	SA4c (Air quality and noise)	-	
SA5: Crime	SA5a (Crime)	0	0
SA6: Economy	SA6a (Economy/Employment)	0	0
SA7: Town Centre	SA7a (Town centres)	0	0
SA8: Climate Change Mitigation	SA8a (Sustainable transport links)	+	++
	SA8b (Services and facilities)	++	
SA9: Biodiversity & Geodiversity	SA9a (Designated sites)	-	+/-
SA10: Landscapes & Townscapes	SA10a (Brownfield land and open space)	-	-
SA11: Historic Environment	SA11a (Heritage significance)	?	0
SA12: Air Quality	SA12a (AQMAs)	-?	0
SA13: Water Management	SA13a (SPZs and contaminated land)	-?	-?
SA14: Flood Risk	SA14a (Flood risk from rivers)	0	0
	SA14b (Flood risk from groundwater)	0	
	SA14c (Surface water flood risk)	-	
SA15: Soils & Minerals	SA15a (Brownfield land)	+	--/+
	SA15b (Greenfield land)	--	
	SA15c (Agricultural land)	--?	
	SA15d (Minerals)	0	

Summary of policy			
	SA15e (Land instability)	-	
SA16: Waste Management	SA16a (Waste)	0	0

SA Findings

C.37 Minor positive effects are expected in relation to SA objective 1: housing because the site will deliver around 80 new dwellings.

C.38 Significant positive effects are expected in relation to SA objectives 2: sustainable travel and 8: climate change mitigation. Although the site is within close proximity of two types of sustainable transport link, it is within 800m of a local centre and 2,000m of an employment area. There are also policy requirements for the development to improve connectivity and accessibility to the Mereway Neighbourhood Centre, to encourage walking and cycling.

C.39 Significant positive effects are expected in relation to SA objective 3: schools because the site is within 500m of Simon De Senlis Primary School and 1,000m of Abbeyfield Secondary School.

C.40 Overall, this policy is judged to have significant positive effects mixed with minor negative effects in relation to SA objective 4: health and well-being. This is because although the site is within 800m of open spaces and a sports facility, it is not within 800m of a healthcare facility. Further to this, a small portion of the site falls within 50m of a railway track, which could generate noise pollution. However, it is noted that this is the end of the railway track and it is therefore unlikely that new residents in the area will be subject to constant rail traffic passing through. Additionally, the policy states that development proposals are required to demonstrate, through the use of design and building materials, that adverse impacts from noise, particularly from railway operations, will be reduced.

C.41 Mixed minor positive and minor negative effects are expected in relation to SA objective 9: biodiversity and geodiversity, because the site directly adjoins the Wootton Railway Embankments Local Wildlife Site and its development could therefore result in adverse effects on biodiversity. However, the policy requires development proposals for the site to be designed in a way that is sensitive towards the Local Wildlife Site, including the potential to make the site more resilient to visitor pressure.

C.42 Minor negative effects are expected in relation to SA objective 10: landscapes and townscapes. This is because development of the site will result in the loss of greenfield land not designated as open space. It is noted that the policy

requires a landscape assessment to be undertaken, to identify how the landscape might be protected, but this may not mitigate against all adverse effects on the landscape as a result of development.

C.43 Uncertain effects were assessed by NBC (now known as WNC) in relation to SA objective 11: historic environment. According to the Site Allocation Heritage Impact Assessment (2020), the site is considered to have low sensitivity and high development potential, partly as a result of built development located either side of the site and between the site and listed buildings. Therefore, development of the site is not considered likely to result in adverse effects on the setting of these listed buildings. As such, a negligible effect is recorded against SA objective 11.

C.44 Negligible effects are expected in relation to SA objective 12: air quality because it appears unlikely from the 2011 Census data and layout of the road network, that car commuters from this site would be likely to pass through an AQMA. Additionally, the policy requires the production of a Transport Assessment that includes consideration of the impact of the scheme on the A45 and the M1.

C.45 Minor negative but uncertain effects are expected in relation to SA objective 13: water management, as parts of the site contain contaminated land which could adversely affect groundwater. However, effects are uncertain dependent on protective measures taken during construction and operation of the employment site.

C.46 Negligible effects are expected in relation to SA objective 14: flood risk because although a small proportion of the site is within a 1 in 100 year surface water flood risk area, the allocation policy states that development of this site should maximise the use of Sustainable Drainage Systems (SuDS) to reduce the rate of surface water run-off.

C.47 Mixed significant negative and minor positive effects are expected in relation to SA objective 15: soils and minerals. This is because the site includes a small area of Category C ground instability and mainly comprises greenfield land classified as Grade 3 agricultural land – all of which would be lost to development. However, the site also contains some brownfield land and its development would be an efficient use of previously developed land.

C.48 Negligible effects are expected in relation to the remaining SA objectives.

Appendix D

Site assessment criteria

Table D.1: Assessment criteria for residential sites

GIS-based assessment criteria	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain negative -?	Minor negative -	Uncertain major negative --?	Major negative --	Additional qualitative/non-GIS factors considered for larger (>=2.5ha) sites
Res1a: Housing provision All of the potential residential sites are expected to have positive effects on this objective, due to the nature of the proposed development. It is assumed that all housing sites with capacity for more than 15 dwellings will make provision for affordable housing (either on site or by way of financial contribution). Larger sites (100+ dwelling capacity) will provide opportunities for developing greater numbers of both new market and affordable homes, and therefore are assumed to have a significant positive effect.	Large sites (100+ dwelling capacity).	Smaller sites (1-99 dwelling capacity).	N/A.	N/A.	N/A.	N/A.	N/A.	N/A.	
Res2a: Walking distance to sustainable transport links Within... <ul style="list-style-type: none">■ 500m of bus stops with services at least every 15 mins during weekday peak travel times■ 2,000m of a railway station■ 500m of a cycle route The proximity of residential sites to public transport links will affect the extent to which residents are able to make use of non-car based modes of transport to access services, facilities and job opportunities. It is possible that new transport links such as bus routes or cycle paths may be provided as part of larger-scale housing developments but this cannot be assumed.	In proximity to all three types of sustainable transport link.	In proximity to two types of sustainable transport link.	N/A.	N/A.	N/A.	In proximity to only one type of sustainable transport link.	N/A.	Not in proximity to any types of sustainable transport link.	Bus service frequency (available from County Council bus routes map). Presence of physical barriers between site option and service centre/employment area.
Res2b: Walking distance to services and facilities The location of housing sites will not directly affect the number or range of services in a particular location (although a large scale housing development could potentially stimulate the provision of new services). However, the location of housing sites could affect this objective by influencing people's ability to access existing services and facilities, particularly by walking.	Within 800m of the town centre or within 800m of a local centre, and 2,000m of an employment area.	Within 800m of a local centre or within 2,000m of an employment area.	N/A.	N/A.	N/A.	All other sites.	N/A.	More than 800m from the town centre and more than 800m from a local centre and more than 2,000m from an employment area.	Presence of physical barriers between site option and service centre/employment area.
Res3a: Walking distance to schools The proximity to residential sites to schools and public transport links to schools will affect the extent to which residents are able to make use of non-car based modes of transport to access educational services. It is possible that new transport links such as bus routes or cycle paths may be provided as part of larger-scale housing developments but this cannot be assumed.	Within 1,000m of a secondary school and 500m of a primary school.	Within 500m of a primary school and more than 1,000m from a secondary school.	N/A.	N/A.	N/A.	More than 500m from a primary school and within 2,000m of a secondary school.	N/A.	More than 500m from a primary school and more than 2,000m from a secondary school.	Presence of physical barriers between site option and school.

GIS-based assessment criteria	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain negative -?	Minor negative -	Uncertain major negative --?	Major negative --	Additional qualitative/non-GIS factors considered for larger (>=2.5ha) sites
Res4a: Walking distance to healthcare facilities Housing sites that are within walking distance (800m) of GP surgeries or hospitals will ensure that residents have good access to healthcare facilities.	N/A.	Within 800m of a healthcare facility.	N/A.	N/A.	N/A.	More than 800m from a healthcare facility.	N/A.	N/A.	Presence of physical barriers between site option and healthcare facility.
Res4b: Walking distance to open space and sports facilities Housing sites that are within walking distance (800m) of open spaces and sport facilities will offer opportunities for residents to take part in physical activity and encourage healthy lifestyles.	Within 800m of an area of open space and within 800m of a sports facility.	Within 800m of an area of open space or within 800m of a sports facility.	N/A.	N/A.	N/A.	More than 800m from any area of open space or sports facility.	N/A.	N/A.	Presence of physical barriers between site option and open space or sports facility.
Res4c: Exposure to low air quality or noise If a housing site is wholly or partly within an Air Quality Management Area (AQMA) there could be an impact on health, particularly if vehicle movements associated with the new development (including potentially HGVs) compound existing air quality problems. New residential development within close proximity of existing major roads or railways or industrial areas may result in noise pollution affecting the new residents in the longer term.	N/A.	N/A.	Not within an AQMA or within 50m of an A-road, motorway, railway line, or industrial area.	N/A.	N/A.	Partly within an AQMA or within 50m from an A-road, motorway, railway line, or industrial area.	N/A.	Wholly within an AQMA and within 50m from an A-road, motorway, railway line, or industrial area.	Presence of industrial areas within 50m of site, based on base map and aerial imagery.
Res5a: Reduce crime The effects of new developments on levels of crime and fear of crime will depend on factors such as the incorporation of green space within developments which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not typically be influenced by the location of development sites (rather they will be determined through the detailed proposals for each site). Therefore, the effects of the potential sites on this SA objective will be assumed to be negligible (0).	N/A.	N/A.	All housing sites.	N/A.	N/A.	N/A.	N/A.	N/A.	
Res6a: Growth of economy and availability of jobs While provision of new housing within Northampton should have positive effects on the economy by supporting temporary growth in the construction sector and by bringing a pool of labour into proximity with local businesses the particular location of individual site allocations within the Borough is assumed not to significantly alter this effect therefore the effects of the potential sites on this SA objective will be assumed to be negligible (0).	N/A.	N/A.	All housing sites.	N/A.	N/A.	N/A.	N/A.	N/A.	
Res7a: Location of sites relative to town centre	N/A.	N/A.	Housing sites outside of Northampton town centre.	Housing sites within Northampton town centre.	N/A.	N/A.	N/A.	N/A.	Qualitative assessment of the effects of development of site options within the town centre will be undertaken with reference to

GIS-based assessment criteria	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain negative -?	Minor negative -	Uncertain major negative --?	Major negative --	Additional qualitative/non-GIS factors considered for larger (>=2.5ha) sites
For the purposes of this SA objective, the town centre will be assumed to be the town centre area defined in the Northampton Central Area Action Plan. It is unlikely that sites outside the Northampton Central Area (as defined in the Northampton Central Area Action Plan) will have an effect on the town centre and all sites outside the town centre will initially be assumed to have a negligible effect (0). Further qualitative assessment will be made for larger sites as set out in the final column of this table. All sites within the town centre will initially be assessed as having uncertain (?) effects as assessment of locational context requires qualitative assessment which will not be carried out for smaller sites. Further qualitative assessment will be made for larger sites as set out in the final column of this table.									each of the SA objective 7 sub-questions (see Table 3.2), taking into account the type of development option and its locational context within the town centre (as defined in the Northampton Central Area Action Plan).
Res8a: Walking distance to sustainable transport links Within... <ul style="list-style-type: none">■ 500m of bus stops with services at least every 15 mins during weekday peak travel times■ 2,000m of a railway station■ 500m of a cycle route [same as Res2a]	In proximity to all three types of sustainable transport link.	In proximity to two types of sustainable transport link.	N/A.	N/A.	N/A.	In proximity to only one type of sustainable transport link.	N/A.	Not in proximity to any types of sustainable transport link.	Bus service frequency (available from County Council bus routes map). Presence of physical barriers between site option and service centre/employment area.
Res8b: Walking distance to services and facilities [same as Res2b]	Within 800m of the town centre or within 800m of a local centre, and 2,000m of an employment area.	Within 800m of a local centre or within 2,000m of an employment area.	N/A.	N/A.	N/A.	All other sites.	N/A.	More than 800m from the town centre and more than 800m from a local centre and more than 2,000m from an employment area.	Presence of physical barriers between site option and service centre/employment area.
Res9a: Proximity to designated sites Site options that are close to an international, national or locally designated conservation site have the potential to affect the biodiversity or geodiversity of those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Recreational disturbance can have a significant effect on Upper Nene Valley Gravel Pits SPA where developments are located up to 3km from the designated site. Proximity to designated sites therefore provides an initial indication of the potential for an adverse effect. However, as a built up area, Northampton already	N/A.	N/A.	All other sites.	N/A.	N/A.	Within 250m of a locally designated biodiversity site.	N/A.	Within 3km of the Upper Nene Valley Gravel Pits SPA and Ramsar site (also a SSSI) or contains optimal supporting habitat for that designation or	The GIS-based assessment scores may need to be adjusted to take into account relevant qualitative factors where these are known, for example: <ul style="list-style-type: none">■ The relationship of the development site option and the designated site (including by reference to the Upper Nene Valley Gravel Pits consultation zones set out in the SPD for this site);

GIS-based assessment criteria	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain negative -?	Minor negative -	Uncertain major negative --?	Major negative --	Additional qualitative/non-GIS factors considered for larger (>=2.5ha) sites
includes urban development close to nature conservation sites. Appropriate mitigation may avoid adverse effects or result in beneficial effects.								overlaps a locally designated biodiversity or geodiversity site.	<ul style="list-style-type: none"> ■ The allocated use; ■ The current use, including whether site is brownfield and has any known biodiversity interest; ■ Existing barriers between the development site and the designated site (e.g. existing built development); ■ The potential for human disturbance and trampling (e.g. from recreation and dog walking, or from noise or light) and any existing measures in place to manage these.
Res10a: Presence of brownfield land, derelict buildings, and open space As a primarily urban area, with no national landscape designations, the effects may often be uncertain because they will depend upon the design of the new development. For the purposes of this SA objective, it is assumed that all new development will be of a high design standard.	Redevelopment of derelict and/or disused brownfield site.	Redevelopment of a brownfield site currently in use.	N/A.	N/A.	N/A.	Loss of greenfield land that is not designated as open space.	N/A.	Loss of all or part of a designated open space.	Where a brownfield site is redeveloped, a qualitative assessment will be made of whether the GIS-based score needs to be adjusted to take into account the existing character of the site, e.g. whether current uses are detracting from the landscape and townscape.
Res11a: Qualitative assessment of potential impact on heritage significance Carried out by NBC officers by reference to Historic England guidance.	N/A.	N/A.	N/A.	N/A.	N/A.	N/A.	N/A.	N/A.	Qualitative assessment of potential impact on heritage significance carried out by NBC officers by reference to Historic England guidance
Res12a: Contribution to road traffic increases within AQMAs All sites will initially be assumed to give rise to a minor negative but this will be uncertain (-?) as assessment of likely road routes for traffic generated by development requires qualitative assessment which will be not carried out for smaller sites. Larger sites will be subject to qualitative assessment as described in last column of table.	N/A.	N/A.	N/A.	N/A.	Initial score for all sites, based on GIS only.	N/A.	N/A.	N/A.	While all site options could generate traffic, and hence air pollution, the main issue in Northampton is the air quality of the seven AQMAs. Professional judgment and 2011 Census data on commuting patterns were used to assess the likelihood of larger sites generating traffic that would use road routes through an AQMA. Larger sites judged likely to generate traffic that uses an AQMA route as its primary access into or out of Northampton were assessed as having a significant negative effect but with uncertainty about actual routes that will be used (-?).
Res13a: Location within a Source Protection Zone (SPZ) or on contaminated land	N/A.	N/A.	Allocation not within a SPZ or	N/A.	Allocation within a SPZ or area of contaminated land.	N/A.	N/A.	N/A.	

GIS-based assessment criteria	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain negative -?	Minor negative -	Uncertain major negative --?	Major negative --	Additional qualitative/non-GIS factors considered for larger (>=2.5ha) sites
The location of housing and employment sites could affect water quality, depending on whether they are in an area where there is capacity at the local sewage treatment works to treat additional wastewater generated by the overall scale of development proposed. However, the overall quantum of development was determined through the adopted JCS and consideration was given to the capacity of sewage treatment works serving Northampton at that time. The Local Plan Part 2 will only determine the specific location of that development within the Plan area. There is one Source Protection Zones (SPZ) (Inner Zone 1) within Northampton Borough and a numbers of areas of contaminated land. Therefore, where a site option is located within the SPZ or an area of contaminated land, there may be a minor negative effect on groundwater quality although this is uncertain, depending on the nature of development, protective measures taken during construction and operation, and the nature of any land contamination.			area of contaminated land.						
Res14a: Flood risk from rivers Residential or employment development on greenfield land would increase the area of impermeable surfaces and could therefore increase overall flood risk, particularly where the sites are within high risk flood zones. While new development in any location may offer good opportunities to incorporate SuDS, and therefore have a positive effect on reducing flood risk, this would depend on the design of the proposed development and not on the location of the site. National Planning Practice Guidance identifies residential properties as a 'more vulnerable use', which is suitable in areas of flood zone 1 and 2 but would require an exception test in flood zone 3a, and is unsuitable in flood zone 3b.	N/A.	N/A.	All other sites.	N/A.	N/A.	Majority (>50%) within Flood Zone 2 or smaller proportion (1-50%) within Flood Zone 3.	N/A.	Majority (>50%) within Flood Zone 3.	
Res14b: Flood risk from groundwater Parts of Northampton are vulnerable to groundwater flooding. Groundwater flood risk can occur via permeable superficial deposits (PSD) (these generally occur in the flood plain, and can be mistaken for fluvial flooding), via high spring flows (spring lines are common in Northamptonshire), and via high bedrock groundwater levels (not a major issue in Northampton due to lack of big aquifers). There are five categories of risk that take into account the duration of flooding: Very High; High; Moderate; Low; and Very Low.	N/A.	N/A.	All other sites.	N/A.	N/A.	Majority (>50%) within 'moderate' groundwater flood risk area or smaller proportion (1-50%) within 'high' or 'very high' groundwater flood risk area.	N/A.	Majority (>50%) within 'high' or 'very high' groundwater flood risk area.	
Res14c: Surface water flood risk Surface water flooding occurs when intense rainfall overwhelms drainage systems. Parts of Northampton have been subject to surface water flooding during	N/A.	N/A.	All other sites.	N/A.	N/A.	Smaller proportion (1-50%) within 1 in 100 year surface	N/A.	Majority (>50%) within 1 in 100 year surface water flood risk area.	

GIS-based assessment criteria	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain negative -?	Minor negative -	Uncertain major negative --?	Major negative --	Additional qualitative/non-GIS factors considered for larger (>=2.5ha) sites
historic flood events, including in November 20132 and April 1998. Environment Agency data 'Risk of Flooding from Surface Water (Basic)' identifies areas with a 1 in 100 years or greater risk of surface water flooding.						water flood risk area.			
Res15a: Prioritising use of brownfield land Prioritising the development of previously developed (brownfield) land can help to ensure that greenfield land is protected from unnecessary development. It represents a more efficient use of land providing that it is not of high environmental value (e.g. for biodiversity).	Site contains 1ha or more of brownfield land.	Site contains up to 1ha of brownfield land.	Site contains no brownfield land.	N/A.	N/A.	N/A.	N/A.	N/A.	No brownfield data available in GIS. Qualitatively assessed all site options >=1.0ha, based on LAA form (if recorded), or OS and aerial imagery.
Res15b: Avoiding loss of greenfield land Discussed under Res15a.	N/A.	N/A.	Site contains no greenfield land.	N/A.	N/A.	Site contains up to 1ha of greenfield land.	N/A.	Site contains 1ha or more of greenfield land.	No greenfield data available in GIS. Planners to manually assess all site options >=1.0ha, based on LAA form (if recorded), or OS and aerial imagery.
Res15c: Avoiding loss of high quality agricultural land Development of high quality agricultural land would result in that land being lost to farming and food production.	N/A.	N/A.	All other sites.	N/A.	N/A.	Contains 1 ha or more of Grade 4 (Poor) agricultural land but less than 1 ha of Grades 1-3.	Contains 1 ha or more of Grade 3 (Good to Moderate) agricultural land but less than 1 ha of Grade 1 or Grade 2.	Contains 1 ha or more of Grade 1 (Excellent) or Grade 2 (Very Good) agricultural land.	
Res15d: Avoiding sterilisation of mineral resources All new development will result in the increased consumption of minerals for construction but this will not be influenced by the location of development sites. However, the location of development sites can influence the efficient use of minerals by their proximity to Sand and Gravel Safeguarding Areas as defined in the Northamptonshire Minerals and Waste Local Plan as development in those areas may sterilise mineral resources and restrict the availability of resources in the districts.	N/A.	N/A.	All other sites.	N/A.	Partly within a Sand and Gravel Safeguarding Area.	N/A.	Wholly within a Sand and Gravel Safeguarding Area or any part within a 'Preventing Land Use Conflict Consultation Buffer' relating to a mineral extraction site as defined in the Minerals and Waste Local Plan.	N/A.	
Res15e: Avoiding risk from land instability There are areas in Northampton that are prone to ground instability issues due to underlying geology and geomorphology. The combination of the Northampton Sand overlying Upper Lias Clay can cause the formation of landslides particularly where slopes have angles greater than seven degrees. Five categories of instability have been identified. Categories A and B include areas where slope instability problems are either not thought to occur or not likely to occur. Category C includes areas where	N/A.	N/A.	None of site contains Category C, D or E Ground Instability.	N/A.	N/A.	Sites that include areas of Category C Ground Instability.	N/A.	Sites that include areas of Category D or E Ground Instability.	

GIS-based assessment criteria	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain negative -?	Minor negative -	Uncertain major negative --?	Major negative --	Additional qualitative/non-GIS factors considered for larger (>=2.5ha) sites
slope instability problems may be present or anticipated, and it is recommended that site investigation at the planning application stage should consider specifically the slope stability of the site. Category D includes areas where slope instability problems are likely to be present or have occurred in the past. Category E covers areas where slope instability problems are almost certainly present and may be active. This category is considered to be a significant constraint on land use. Therefore, sites in the higher categories could have a negative effect on preventing both new and existing development from contributing to or being put at unacceptable risk from land instability.									
Res16a: Avoiding conflicts with waste management sites All new development will inevitably involve an increase in waste generation, but it may also offer good opportunities for incorporating sustainable waste management practices, regardless of the location. Levels of recycling will not be influenced by the location of site options, as the whole of Northampton is covered by kerbside recycling collections for residential properties and levels of recycling within employment developments will depend on the practices of the businesses that locate there. The Northamptonshire Minerals and Waste Local Plan (MWLP) identifies sites for waste management facilities in Northampton. The allocation of sites, particularly residential sites, in or close to such sites could affect the ability of the waste management facilities to come forward. Waste management facilities can give rise to noise, traffic, odour and light pollution during construction and operation. The effects are very dependent on the type of facility, its design and potential mitigation measures proposed, which would be assessed at the planning application stage. It is assumed that the facility will be well run and that mitigation measures implemented should be sufficient to avoid any potential amenity effects. The Minerals and Waste Local Plan requires local planning authorities to consult the Minerals Planning Authority (Northamptonshire County Council) on proposals for major development that is considered to be incompatible with the affected waste development within 300 m. Residential and offices are considered to be of medium sensitivity and industrial and outdoor storage as low sensitivity uses.	N/A.	N/A.	All other sites.	N/A.	N/A.	N/A.	Within 300m of an industrial area in which the MWLP considers waste management uses to be acceptable.	Within 300m of an active or committed waste management facility.	

Table D.2: Assessment criteria for employment sites

Initial quantitative/ GIS-based assessment for all site options; larger sites (>=2.5 ha) will also be subject to the qualitative assessment described in the last column	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain minor negative -?	Minor negative -	Uncertain significant negative --?	Significant negative --	Additional qualitative/ non-GIS factors considered for larger (>=2.5 ha) sites
Emp1a: Housing provision The locations of employment sites are unlikely to have a direct effect on this SA objective and all sites will therefore have a negligible (0) effect.	N/A	N/A	All employment sites	N/A	N/A	N/A	N/A	N/A	
Emp2a: Walking distance to sustainable transport links Within... - 500m of bus stops with services at least every 15 mins during weekday peak travel times - 2,000m of a railway station - 500m of a cycle route As Northampton is primarily a built-up area, it is likely that employment locations will be relatively close to residential areas meaning that some people are likely to be within walking distance, although there is no guarantee that they will work at the nearest employment site. Therefore, accessibility to employment sites by sustainable modes of transport will be particularly important. Where employment sites are located in close proximity to sustainable transport links there are more likely to be good opportunities for people to commute to and from the site using non-car based modes of transport.	In proximity to all three types of sustainable transport link	In proximity to two types of sustainable transport link	N/A	N/A	N/A	In proximity to only one type of sustainable transport link	N/A	Not in proximity to any types of sustainable transport link	
Emp3a: Walking distance to schools The location of employment sites will not have a direct effect on this SA objective and all sites will therefore have a negligible (0) effect.	N/A	N/A	All employment sites	N/A	N/A	N/A	N/A	N/A	
Emp4a: Noise and light impacts on sensitive receptors Where new employment development is proposed in close proximity to existing sensitive receptors (e.g. houses, schools, hospitals etc.) there may be negative effects on amenity as a result of increased noise and light pollution depending on the nature of commercial activities at the site. All employment sites will initially be assumed to give rise to a minor negative effect but this will be uncertain (-?) effect as assessment of sensitivity of surrounding receptors requires qualitative assessment which will be not carried out for smaller sites. Larger sites will be subject to qualitative assessment as described in last column of table.	N/A	N/A	N/A	N/A	All smaller employment sites	N/A	N/A	N/A	Where new employment development is proposed on larger sites within close proximity to existing sensitive receptors (e.g. houses, schools, hospitals etc.) there may be negative effects on amenity as a result of increased noise and light pollution depending on the nature of commercial activities at the site. • Employment sites that are not directly adjacent to residential development or other sensitive receptors but which have such receptors within 100m may have a minor negative (-?) effect although this is uncertain. • Employment sites that are directly to residential development or other sensitive receptors may

Initial quantitative/ GIS-based assessment for all site options; larger sites (>=2.5 ha) will also be subject to the qualitative assessment described in the last column	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain minor negative -?	Minor negative -	Uncertain significant negative --?	Significant negative --	Additional qualitative/ non-GIS factors considered for larger (>=2.5 ha) sites
									have a significant negative (--?) effect although this is uncertain. • All other employment sites are assumed to have a negligible effect (0).
Emp5a: Reduce crime The effects of new developments on levels of crime and fear of crime will depend on factors such as the incorporation of green space within developments which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not typically be influenced by the location of development sites (rather they will be determined through the detailed proposals for each site). Therefore, the effects of the potential sites on this SA objective will be assumed to be negligible (0).	N/A	N/A	All employment sites	N/A	N/A	N/A	N/A	N/A	
Emp6a: Employment provision All of the potential employment sites are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for generating larger numbers of jobs and the greatest economic benefits, and therefore are assumed to have a significant positive effect.	Large sites (1 ha and above)	Smaller sites (below 1 ha)	N/A	N/A	N/A	N/A	N/A	N/A	
Emp7a: Location of sites relative to town centre For the purposes of this SA objective, the town centre will be assumed to be the town centre area defined in the Northampton Central Area Action Plan. It is unlikely that sites outside the Northampton Central Area (as defined in the Northampton Central Area Action Plan) will have an effect on the town centre and all sites outside the town centre will initially be assumed to have a negligible effect (0). Further qualitative assessment will be made for larger sites as set out in the final column of this table. All sites within the town centre will initially be assessed as having uncertain (?) effects as assessment of locational context requires qualitative assessment which will not be carried out for smaller sites. Further qualitative assessment will be made for larger sites as set out in the final column of this table.	N/A	N/A	Employment sites outside of Northampton town centre	Employment sites within Northampton town centre	N/A	N/A	N/A	N/A	Qualitative assessment of the effects of development of site options within the town centre will be undertaken with reference to the SA objective 7 sub-questions (see Error! Reference source not found.), taking into account the type of development option and its locational context within the town centre (as defined in the Northampton Central Area Action Plan).
Emp8a: Walking distance to sustainable transport links	In proximity to all three types of	In proximity to two types of	N/A	N/A	N/A	In proximity to only one type of	N/A	Not in proximity to any types of	

Initial quantitative/ GIS-based assessment for all site options; larger sites (>=2.5 ha) will also be subject to the qualitative assessment described in the last column	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain minor negative -?	Minor negative -	Uncertain significant negative --?	Significant negative --	Additional qualitative/ non-GIS factors considered for larger (>=2.5 ha) sites
<p>Within... - 500m of bus stops with services at least every 15 mins during weekday peak travel times - 2,000m of a railway station - 500m of a cycle route [same as test 2(a)]</p> <p>While new employment development will inevitably lead to an increase in greenhouse gas emissions (both through emissions from buildings and the increased vehicle traffic associated with commuting and commercial activities), the location of individual employment sites will not have an effect on levels of energy consumption and the potential for renewable energy use. These factors would be influenced more by the specific design and construction methods used, and whether renewable energy infrastructure is to be incorporated in the development, which will not be known until planning applications come forward. The likely levels of emissions from commercial activities cannot be assessed at this stage as this will depend largely on the nature of businesses that eventually locate at the employment sites.</p> <p>Therefore, the location of employment development will influence the achievement of this SA objective primarily through the likely impacts on levels of car use amongst employees; the same assessment criteria as those listed under SA objective 2 are therefore applicable.</p>	sustainable transport link	sustainable transport link				sustainable transport link		sustainable transport link	
<p>Emp9a: Proximity to designated sites</p> <p>Site options that are close to an international, national or locally designated conservation site have the potential to affect the biodiversity or geodiversity of those sites, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Proximity to designated sites therefore provides an initial indication of the potential for an adverse effect. However, as a built up area, Northampton already includes urban development close to nature conservation sites. Appropriate mitigation may avoid adverse effects or result in beneficial effects.</p>	N/A	N/A	All other sites	N/A	N/A	Within 250m of a designated biodiversity site	N/A	Within the relevant consultation zones (2km) for the Upper Nene Valley Gravel Pits SPA and Ramsar site (also a SSSI), or contains optimal supporting habitat for that designation or overlaps a locally designated biodiversity or geodiversity site	The GIS-based assessment may need to be adjusted to take into account relevant qualitative factors where these are known, for example: <ul style="list-style-type: none"> - the relationship of the development site option and the designated site (including by reference to the Upper Nene Valley Gravel Pits consultation zones set out in the SPD for this site); - the allocated use; - the current use, including whether site is brownfield and has any known biodiversity interest; - existing barriers between the development site and the

Initial quantitative/ GIS-based assessment for all site options; larger sites (>=2.5 ha) will also be subject to the qualitative assessment described in the last column	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain minor negative -?	Minor negative -	Uncertain significant negative --?	Significant negative --	Additional qualitative/ non-GIS factors considered for larger (>=2.5 ha) sites
									designated site (e.g. existing built development); - the potential for disturbance from noise or light and any existing measures in place to manage these.
Emp10a: Presence of brownfield land, derelict buildings, and open space As a primarily urban area, with no national landscape designations, the effects may often be uncertain because they will depend upon the design of the new development. For the purposes of this SA objective, it is assumed that all new development will be of a high design standard.	Redevelopment of derelict and/or disused brownfield site	Redevelopment of a brownfield site currently in use	N/A	N/A	N/A	Loss of greenfield land that is not designated as open space	N/A	Loss of all or part of a designated open space	Where a brownfield site is redeveloped, the score may need to be adjusted to take into account the existing character of the site, e.g. whether current uses are detracting from the landscape and townscape.
Emp11a: Qualitative assessment of potential impact on heritage significance Carried out by NBC officers by reference to Historic England guidance	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Qualitative assessment of potential impact on heritage significance carried out by NBC officers by reference to Historic England guidance
Emp12a: Contribution to road traffic increases within AQMAs All sites will initially be assumed to give rise to a minor negative but this will be uncertain (-?) as assessment of likely road routes for traffic generated by development requires qualitative assessment which will be not carried out for smaller sites. Larger sites will be subject to qualitative assessment as described in last column of table.	N/A	N/A	N/A	N/A	Initial score for all sites, based on GIS only	N/A	N/A	N/A	While all site options could generate traffic, and hence air pollution, the main issue in Northampton is the air quality of the seven AQMAs. Professional judgment and 2011 Census data on commuting patterns were used to assess the likelihood of larger sites generating traffic that would use road routes through an AQMA. Larger sites judged likely to generate traffic that uses an AQMA route as its primary access into or out of Northampton were assessed as having a significant negative effect but with uncertainty about actual routes that will be used (-?).
Emp13a: Location within a Source Protection Zone (SPZ) or on contaminated land The location of housing and employment sites could affect water quality, depending on whether they are in an area where there is capacity at the local sewage treatment works to treat additional wastewater generated by the overall scale of development proposed. However, the overall quantum of development was determined through the adopted	N/A	N/A	Allocation not within a SPZ or area of contaminated land	N/A	Allocation within a SPZ or area of contaminated land	N/A	N/A	N/A	

Initial quantitative/ GIS-based assessment for all site options; larger sites (>=2.5 ha) will also be subject to the qualitative assessment described in the last column	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain minor negative -?	Minor negative -	Uncertain significant negative --?	Significant negative --	Additional qualitative/ non-GIS factors considered for larger (>=2.5 ha) sites
JCS and consideration was given to the capacity of sewage treatment works serving Northampton at that time. The Local Plan Part 2 will only determine the specific location of that development within the Plan area. There is one Source Protection Zones (SPZ) (Inner Zone 1) within Northampton Borough and a number of areas of contaminated land. Therefore, where a site option is located within the SPZ or an area of contaminated land, there may be a minor negative effect on groundwater quality although this is uncertain, depending on the nature of development, protective measures taken during construction and operation, and the nature of any land contamination.									
Emp14a: Flood risk from rivers National Planning Practice Guidance identifies offices and general industry as a 'less vulnerable use', which is suitable in areas of flood zone 1, 2 and 3a but is unsuitable in flood zone 3b.	N/A	N/A	All other sites	N/A	N/A	Majority (>50%) within Flood Zone 2 or smaller proportion (1-50%) within Flood Zone 3	N/A	Majority (>50%) within Flood Zone 3	
Emp14b: Flood risk from groundwater Parts of Northampton are vulnerable to groundwater flooding. Therefore the appraisal needs to include assessment criteria to reflect this type of flood risk.	N/A	N/A	All other sites	N/A	N/A	Majority (>50%) within 'moderate' groundwater flood risk area or smaller proportion (1-50%) within 'high' or 'very high' groundwater flood risk area	N/A	Majority (>50%) within 'high' or 'very high' groundwater flood risk area	
Emp14c: Surface water flood risk Surface water flooding occurs when intense rainfall overwhelms drainage systems. Parts of Northampton have been subject to surface water flooding during historic flood events, including in November 20132 and April 1998. Environment Agency data 'Risk of Flooding from Surface Water (Basic)' identifies areas with a 1 in 100 years or greater risk of surface water flooding.	N/A	N/A	All other sites	N/A	N/A	Smaller proportion (1-50%) within 1 in 100 year surface water flood risk area	N/A	Majority (>50%) within 1 in 100 year surface water flood risk area	
Emp15a: Prioritising use of brownfield land Prioritising the development of previously developed (brownfield) land can help to ensure that greenfield land is protected from unnecessary development. It represents a more efficient use of land providing that it is not of high environmental value (e.g. for biodiversity).	Site contains 1ha or more of brownfield land	Site contains up to 1ha of brownfield land	Site contains no brownfield land	N/A	N/A	N/A	N/A	N/A	No brownfield data available in GIS. Planners to manually assess all site options >=1.0ha, based on LAA form (if recorded), or OS and aerial imagery

Initial quantitative/ GIS-based assessment for all site options; larger sites (>=2.5 ha) will also be subject to the qualitative assessment described in the last column	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain minor negative -?	Minor negative -	Uncertain significant negative --?	Significant negative --	Additional qualitative/ non-GIS factors considered for larger (>=2.5 ha) sites
Emp15b: Avoiding loss of greenfield land Discussed under Emp15a.	N/A	N/A	Site contains no greenfield land	N/A	N/A	Site contains up to 1ha of greenfield land	N/A	Site contains 1ha or more of greenfield land	No greenfield vs. brownfield data available in GIS. Planners to manually assess all site options >=1.0ha, based on LAA form (if recorded), or OS and aerial imagery
Emp15c: Avoiding loss of high quality agricultural land Development of high quality agricultural land would result in it being lost to farming and food production.	N/A	N/A	All other sites	N/A	N/A	Contains 1 ha or more of Grade 4 (Poor) agricultural land but less than 1 ha of Grades 1-3	Contains 1 ha or more of Grade 3 (Good to Moderate) agricultural land but less than 1 ha of Grade 1 or Grade 2	Contains 1 ha or more of Grade 1 (Excellent) or Grade 2 (Very Good) agricultural land	
Emp15d: Avoiding sterilisation of mineral resources All new development will result in the increased consumption of minerals for construction but this will not be influenced by the location of development sites. However, the location of development sites can influence the efficient use of minerals by their proximity to Sand and Gravel Safeguarding Areas as defined in the Northamptonshire Minerals and Waste Local Plan as development in those areas may sterilise mineral resources and restrict the availability of resources in the districts.	N/A	N/A	All other sites	N/A	Partly within a Sand and Gravel Safeguarding Area	N/A	Wholly within a Sand and Gravel Safeguarding Area or any part within a 'Preventing Land Use Conflict Consultation Buffer' relating to a mineral extraction site as defined in the Minerals and Waste Local Plan	N/A	
Emp15e: Avoiding risk from land instability There are areas in Northampton that are prone to ground instability issues due to underlying geology and geomorphology. The combination of the Northampton Sand overlying Upper Lias Clay can cause the formation of landslides particularly where slopes have angles greater than seven degrees. Five categories of instability have been identified. Categories A and B include areas where slope instability problems are either not thought to occur or not likely to occur. Category C includes areas where slope instability problems may be present or anticipated, and it is recommended that site investigation at the planning application stage should consider specifically the slope stability of the site. Category D includes areas where slope instability problems are likely to be present or have occurred in the past. Category E covers areas where slope instability problems are almost certainly present and may be active. This category is considered to be a significant constraint on land use. Therefore, sites in the higher categories could have a negative effect on preventing both new and existing development from	N/A	N/A	None of site contains Category C, D or E Ground Instability	N/A	N/A	Sites that include areas of Category C Ground Instability	N/A	Sites that include areas of Category D or E Ground Instability	

Initial quantitative/ GIS-based assessment for all site options; larger sites (>=2.5 ha) will also be subject to the qualitative assessment described in the last column	Significant positive ++	Minor positive +	Negligible 0	Uncertain effects ?	Uncertain minor negative -?	Minor negative -	Uncertain significant negative --?	Significant negative --	Additional qualitative/ non-GIS factors considered for larger (>=2.5 ha) sites
contributing to or being put at unacceptable risk from land instability.									
Emp16a: Avoiding conflicts with waste management sites All new development will inevitably involve an increase in waste generation, but it may also offer good opportunities for incorporating sustainable waste management practices, regardless of the location. Levels of recycling will not be influenced by the location of site options, as the whole of Northampton is covered by kerbside recycling collections for residential properties and levels of recycling within employment developments will depend on the practices of the businesses that locate there. The Northamptonshire Minerals and Waste Local Plan identifies sites for waste management facilities in Northampton. The allocation of sites, particularly residential sites, in or close to such sites could affect the ability of the waste management facilities to come forward. Waste management facilities can give rise to noise, traffic, odour and light pollution during construction and operation. The effects are very dependent on the type of facility, its design and potential mitigation measures proposed, which would be assessed at the planning application stage. It is assumed that the facility will be well run and that mitigation measures implemented should be sufficient to avoid any potential amenity effects. The Minerals and Waste Local Plan requires local planning authorities to consult the Minerals Planning Authority (Northamptonshire County Council) on proposals for major development that is considered to be incompatible with the affected waste development within 300 m. Residential and offices are considered to be of medium sensitivity and industrial and outdoor storage as low sensitivity uses.	N/A	N/A	All other sites	N/A	N/A	N/A	Within 300m of an industrial area in which the MWLP considers waste management uses to be acceptable	Within 300m of an active or committed waste management facility	

West Northamptonshire Council

Northampton Local Plan (Part 2)

Habitats Regulations Assessment Report

Draft report
Prepared by LUC
June 2022



West Northamptonshire Council

Northampton Local Plan (Part 2) Habitats Regulations Assessment Report

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June 2022

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Chapter 1

Introduction

An introduction to the Habitats Regulations Assessment process and work done to date in relation to the Northampton Local Plan Part 2

1.1 LUC has been commissioned by West Northamptonshire Council (formerly Northampton Borough Council) to carry out a Habitats Regulations Assessment (HRA) of its Local Plan. This report presents the methodology and findings of the HRA of the Northampton Local Plan Part 2, Main Modifications version.

Background to the preparation of the Local Plan Part 2

1.2 West Northamptonshire Council (WNC) is producing a new Local Plan for Northampton. Once adopted, the Local Plan will set out policies and guidance for development of Northampton over the next ten years to 2029. The Local Plan Part 2 will replace the saved policies from the Northampton Local Plan adopted in 1997 and the Central Area Action Plan (2013).

1.3 The West Northamptonshire Core Strategy (Local Plan Part 1) was adopted in December 2014 and covers the administrative areas of Daventry District, Northampton and South Northamptonshire. It sets out the long-term vision and objectives for the whole of the West Northamptonshire Area for the plan period up until 2029. The Joint Core Strategy forms part of the Development Plan for Northampton.

1.4 West Northamptonshire Council's Local Plan Part 2 complements the Joint Core Strategy, by providing detailed planning policies to manage and guide development across the Plan area. It sets out figures to guide the scale of new development in Northampton, identifies locations for growth of new housing and employment, and provides policies to help determine planning applications in the future. As well as identifying where new development will go, it also sets out policies to protect and preserve open space, green infrastructure, historic heritage and environmental assets.

The requirement to undertake Habitats Regulations Assessment of Development Plans

1.5 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010 and again in 2012. These updates were consolidated into the Conservation of Habitats and Species Regulations 2017¹.

1.6 The UK exited the EU on 31 January 2020. There is now a transition period until the end of 2020 during which EU legislation and policy will be followed. The only exception to this is that while EU case law from before 31 January 2020 will continue to be relevant to the UK position, any modifications to the law as a result of cases after that date will not be relevant to the UK. The 2019 EU Exit amendments will not come into effect until the end of the Implementation Period. The Regulations remain exactly as they were before 31 January 2020. The 2017 Regulations as amended by earlier (non-Brexit) amendments are in effect but are currently unamended by the EU Exit amendments.

1.7 The HRA refers to the assessment of the potential effects of a development plan on one or more European Sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs):

- SPAs are classified under the European Council Directive “on the conservation of wild birds” (79/409/EEC; ‘Birds Directive’) for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex 1 of the Birds Directive, and migratory species);
- SACs are designated under the Habitats Directive and target particular habitats (Annex 1) and/or species (Annex II) identified as being of European importance.

Table 1.1: Stages in HRA

Stage	Task	Outcome
Stage 1: Screening (the ‘Significance Test’)	Description of the plan. Identification of potential effects on European Sites. Assessing the effects on European Sites.	Where effects are unlikely, prepare a ‘finding of no significant effect report’. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.
Stage 2: Appropriate Assessment (the ‘Integrity Test’)	Gather information (plan and European Sites).	Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the

¹ *The Conservation of Habitats and Species Regulations 2017* (Statutory Instrument 2017 No. 1012) consolidates the Conservation of Habitats and Species Regulations 2010 with subsequent amendments.

² Department of Communities and Local Government (July 2018) *National Planning Policy Framework* (para 176).

1.8 Currently, the Government also expects potential SPAs (pSPAs), candidate SACs (cSACs) and Ramsar sites to be included within the assessment².

- Ramsar sites support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).
- Candidate SACs (cSACs) and Sites of Community Importance (SCIs), which are sites that have been adopted by the European Commission but not yet formally designated by the government, must also be considered.

1.9 For ease of reference during HRA, these three designations are collectively referred to as European sites, despite Ramsar designations being at the wider international level.

1.10 The overall purpose of the HRA is to conclude whether or not a proposal or policy, or whole development plan would adversely affect the integrity of the site in question. This is judged in terms of the implications of the plan for a site’s ‘qualifying features’ (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Stages of Habitats Regulations Assessment

1.11 **Table 1.1** summarises the stages involved in carrying out a full HRA based on various guidance documents.^{3, 4} This HRA presents the methodology and findings of Stage 1: Screening and Stage 2: Appropriate Assessment.

³ *Planning for the Protection of European Sites. Guidance for Regional Spatial Strategies and Local Development Documents*. Department for Communities and Local Government (DCLG), August 2006.

⁴ The HRA Handbook. David Tyladesley & Associates, a subscription based online guidance document: <https://www.dtapublications.co.uk/handbook/>

Stage	Task	Outcome
	<p>Impact prediction.</p> <p>Evaluation of impacts in view of conservation objectives.</p> <p>Where impacts considered to affect qualifying features, identify alternative options.</p> <p>Assess alternative options.</p> <p>If no alternatives exist, define and evaluate mitigation measures where necessary.</p>	<p>European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures.</p> <p>If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.</p>
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	<p>Identify and demonstrate 'imperative reasons of overriding public interest' (IROPI).</p> <p>Demonstrate no alternatives exist.</p> <p>Identify potential compensatory measures.</p>	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

1.12 In assessing the effects of the Local Plan Part 2 in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017⁵, there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed, if necessary, by an Appropriate Assessment which will inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not –
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects (the 'Significance Test'). [These two steps are undertaken as part of Stage 1: Screening shown in **Table 1.1** above.] If Yes –
- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public. [This step is undertaken during Stage 2: Appropriate Assessment shown in **Table 1.1**.]
- Step 4: In accordance with Reg.105(4), but subject to Reg.107, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the European site.

1.13 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help

ensure that potential adverse effects are identified and eliminated through the avoidance of likely significant effects at Stage 1, and through Appropriate Assessment at Stage 2 by the inclusion of mitigation measures designed to avoid, reduce or abate effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government (and European Commission during the Brexit transition period).

1.14 The HRA should be undertaken by the 'competent authority' - in this case WNC, and LUC has been commissioned to do this on its behalf. The HRA also requires close working with Natural England as the statutory nature conservation body⁶ in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals.

Recent case law changes

1.15 This HRA has been prepared in accordance with recent case law findings, including most notably the recent 'People over Wind' and 'Holohan' rulings from the Court of Justice for the European Union (CJEU).

1.16 The recent *People over Wind, Peter Sweetman v Coillte Teoranta* (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account

⁵ SI No. 2017/2012

⁶ Regulation 5 of *The Conservation of Habitats and Species Regulations 2017* (Statutory Instrument 2017 No. 1012).

at the screening stage. The precise wording of the ruling is as follows:

"Article 6(3) ...must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site."

1.17 In light of the above, the HRA screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the Local Plan Part 2 could result in likely significant effects on European sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

1.18 This HRA also fully considers the recent Holohan v An Bord Pleanala (November 2018) judgement which stated that:

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an 'appropriate assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'appropriate assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

1.19 In undertaking this HRA, LUC has fully considered the potential for effects on species and habitats, including those

not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, has been fully considered in this HRA.

Previous HRA work

HRA of the Local Plan Part 2 Proposed Submission (Regulation 19) (2019)

1.20 In May 2019, the Local Plan Part 2 Proposed Submission was published for (Regulation 19) consultation, along with LUC's HRA of the plan.

1.21 In response to the consultation, the Local Plan Part 2 has been updated (see Chapter 2) and the current HRA (2020) reflects those changes and consultation with Natural England (see Appendix E).

Review of Local Plan Part 2 site options (2017)

1.22 LUC undertook some initial work reviewing the Local Plan Part 2 site allocation options, with reference to the requirements of the Habitats Regulations. HRA screening was not carried out as the preferred sites had not been identified at that stage; however, the report considered the types of effects that could arise as a result of the Local Plan Part 2 and whether it was possible to rule any out.

1.23 That work provides background information for this HRA report, but this HRA has been fully assessed in line with the case law that has been determined since 2017.

HRA of the West Northamptonshire Joint Core Strategy (2007-2013)

1.24 In 2007 an HRA screening report was prepared for the West Northamptonshire Joint Core Strategy. This identified likely significant effects at Rutland Water SPA and Ramsar site and the Upper Nene Valley Gravel Pits SPA and Ramsar site. These sites were therefore investigated further through Appropriate Assessment which took place between 2009 and 2013, as the Appropriate Assessment was continually updated alongside the emerging Joint Core Strategy. A final HRA addendum was submitted in 2013 for the Proposed Main Modifications Joint Core Strategy. The Joint Core Strategy was adopted on 15th December 2014.

1.25 Some of the evidence gathered during the HRA work for the Joint Core Strategy⁷ has been referenced within this report.

Structure of the HRA report

1.26 This chapter (Chapter 1) has introduced the requirement to undertake HRA of the Local Plan Part 2. The remainder of the report is structured as follows:

- Chapter 2: The Local Plan Part 2 summarises the content of the Main Modifications version of the Northampton Local Plan Part 2, which is the subject of this report.
- Chapter 3: HRA methodology sets out the approach used and the specific tasks undertaken during the screening stage of the HRA.
- Chapter 4: HRA screening describes the findings of the screening stage of the HRA.
- Chapter 5: Appropriate Assessment sets out the methodology and findings of the Appropriate Assessment stage of the HRA.
- Chapter 6: Conclusions summarises the HRA findings and conclusions.

⁷ <http://www.westnorthamptonshirejpu.org/connect.ti/website/view?objectId=2757328#2757328>

Chapter 2

The Local Plan

The Local Plan Part 2 contains the development management policies and site allocations that will guide development within Northampton for the period to 2029

2.1 The Local Plan Part 2 forms part of the Development Plan for Northampton, against which planning applications will be determined (unless there are material considerations that indicate otherwise), alongside:

- The West Northamptonshire Joint Core Strategy (JCS) (Local Plan Part 1); and
- Any 'made' Neighbourhood Plans (currently Great Houghton, Duston, Spring Boroughs, and 'Growing Together').

2.2 Preparation of the Local Plan Part 2 has involved the following stages:

- Issues consultation, May-June 2016;
- Options consultation, September-November 2016;
- Sites consultation, September-October 2017;
- Proposed Submission (Regulation 19) consultation round 1, May-June 2019;
- Proposed Submission (Regulation 19) consultation round 2, July-September 2020;
- Local Plan Hearings, November 2021.

2.3 The Local Plan Part 2 has been updated following the Hearings and subsequent agreement of Main Modifications. This HRA assesses the (Main Modifications version of the Local Plan Part 2).

2.4 The Local Plan Part 2 presents an overall vision for Northampton and 13 overarching objectives that define Northampton's policy priorities. It then sets out 36 development management policies and an additional eight policies that provide site-specific design principles for eight of the larger allocated sites. Each of the development management policies identifies one or more corresponding

policies from the JCS that will be implemented through the Local Plan Part 2 policy. For example, *Policy 30: Upper Nene Valley Gravel Pits Special Protection Area* delivers JCS Policy BN4 Upper Nene Valley Gravel Pits Special Protection Area. Although policies from both plans are related in this way, both apply to development in Northampton.

2.5 Each of the policies within the Local Plan Part 2 is listed in the scoping matrix in Appendix C.

2.6 In total, 64 sites are allocated for development, as shown in **Figure 2.1**, comprising:

- 49 sites for residential (only) development;
- 10 sites for employment (only) development;
- Two sites for mixed residential / employment development; and
- Three burial sites.

2.7 Full titles and site references for sites shown on **Figure 2.1** are provided in **Appendix D**.

2.8 The sites allocated for residential development are intended to provide 3,838 new homes over the plan period. The Local Plan Part states that:

The West Northamptonshire Joint Core Strategy (JCS) established an objectively assessed need of 25,758 dwellings for Northampton between 2011 and 2029. JCS Policy S3 sets the housing requirement for Northampton from 2011 to 2029 at about 18,870 dwellings.

7,073 of these dwellings (37%) are to be provided in the Sustainable Urban Extensions (SUEs) allocated by the JCS.

By 1st April 2021, 6,957 dwellings had been delivered, against a JCS requirement to allocate sufficient sites (allowing for windfall) to accommodate 11,236 new dwellings in Northampton by that time.

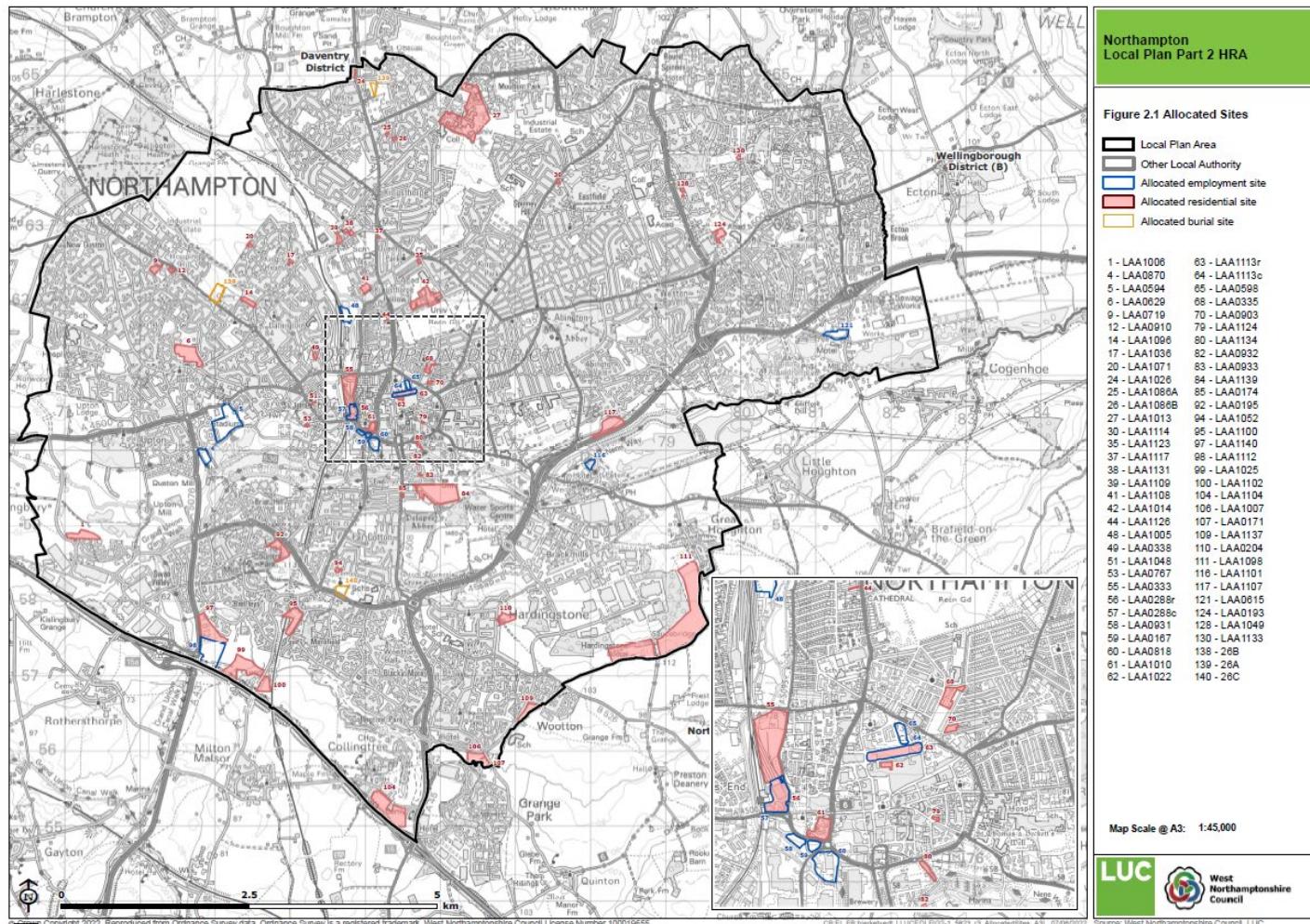
The number of dwellings delivered by 1st April 2021 falls some 4,279 units short of the delivery trajectory set out in the JCS.

2.9 The c.18,870 homes planned in the JCS have already been subject to HRA. The additional number of homes provided by the Local Plan Part 2 is 3,838. These allocations will contribute towards the delivery of the quantum of housing required by the JCS.

Chapter 2
The Local Plan

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Figure 2.1: Allocated sites



Chapter 3

HRA methodology

An explanation of the approach taken in this assessment

Screening

3.1 HRA Screening of the Local Plan Part 2 has been undertaken in line with current available guidance and seeks to meet the requirements of the Habitats Regulations. The Habitats Regulations require screening to involve the stages outlined in **Table 3.1**.

3.2 Local Plans fall within the scope of the Habitats Regulations (screening stage 1; see paragraph 1.5) and West Northamptonshire Council is the competent authority with regards to screening the Local Plan Part 2 (screening stage 8). The information required to determine whether the Local Plan Part 2 is likely to have a significant effect (screening stage 7) is set out below and in Chapter 4.

3.3 The methodology for the remainder of the stages is described below; Chapter 4 HRA Screening Assessment provides the responses to each stage with reference to the Local Plan Part 2.

Table 3.1: Stages of HRA screening⁸

Regulation	Stage required by Regulation
Reg. 63(1)	1) Determine whether the plan or project is within the scope of the Habitats Regulations 2) Determine whether the plan or project is of a type that could possibly have any (positive or negative) effect on a European site 3) Determine whether the plan or project is directly connect with or necessary to the management of the European sites potentially affected 4) Identify the European sites potentially adversely affected and their conservation objectives 5) Determine whether the plan or project is likely to have a significant adverse effect on any European site alone 6) Determine whether the plan or project is likely to have a significant adverse effect on any European site in combination with other plans or projects
Reg. 63(2)	7) Requires the information necessary to decide whether the plan or project would be likely to have a significant adverse effect on a European site either alone or in combination with other plans or projects
Reg. 67	8) Coordination where more than one competent authority is involved in screening the plans or projects

Identifying types of potential impact from the Local Plan Part 2

3.4 **Table 3.2** sets out the range of potential impacts that development of the type included in the Local Plan Part 2 and related activities may have on European sites. This table has

been prepared by LUC for use in informing HRA judgements, drawing on our experience of HRA and comments previously provided by Natural England relating to the potential impacts and activities that could affect European sites.

Table 3.2: Potential impacts and activities arising from implementation of the Local Plan Part 2 that could adversely affect European sites

Broad categories and examples of potential impacts on European sites	Examples of activities responsible for impacts
Physical loss <ul style="list-style-type: none"> ■ Removal (including offsite effects, e.g. foraging habitat) ■ Smothering ■ Habitat degradation 	Development (e.g. housing, employment, infrastructure, tourism) Structural alterations to buildings (bat roosts) Afforestation Tipping Cessation of or inappropriate management for nature conservation
Physical damage <ul style="list-style-type: none"> ■ Direct mortality ■ Sedimentation / silting ■ Prevention of natural processes ■ Habitat degradation 	Flood defences Dredging Recreation (e.g. motor cycling, cycling, walking, horse riding, water sports, caving) Development (e.g. infrastructure, tourism, adjacent housing etc.)

⁸ Adapted from the HRA Handbook David Tyldesley & Associates: <https://www.dtapublications.co.uk/handbook/>

Broad categories and examples of potential impacts on European sites	Examples of activities responsible for impacts
<ul style="list-style-type: none"> ■ Erosion ■ Trampling ■ Fragmentation ■ Severance / barrier effect ■ Edge effects ■ Fire 	Vandalism Arson Cessation of or inappropriate management for nature conservation
Non-physical disturbance <ul style="list-style-type: none"> ■ Noise ■ Vibration ■ Visual presence ■ Human presence ■ Light pollution 	Development (e.g. housing, industrial) Recreation (e.g. dog walking, water sports) Industrial activity Vehicular traffic Artificial lighting (e.g. street lighting)
Water table/availability <ul style="list-style-type: none"> ■ Drying ■ Flooding / stormwater increase ■ Water level and stability ■ Water flow (e.g. reduction in velocity of surface water) ■ Barrier effect (on migratory species) 	Water abstraction Drainage interception (e.g. reservoir, dam, infrastructure and other development) Increased discharge (e.g. drainage, runoff)
Toxic contamination <ul style="list-style-type: none"> ■ Water pollution ■ Soil contamination ■ Air pollution 	Oil / chemical spills Tipping Vehicular traffic Industrial waste / emissions
Non-toxic contamination <ul style="list-style-type: none"> ■ Nutrient enrichment (e.g. of soils and water) ■ Algal blooms ■ Changes in salinity ■ Changes in thermal regime ■ Changes in turbidity ■ Air pollution (dust) 	Sewage discharge Water abstraction Industrial activity Flood defences Construction
Biological disturbance <ul style="list-style-type: none"> ■ Direct mortality ■ Out-competition by non-native species ■ Selective extraction of species ■ Introduction of disease ■ Rapid population fluctuations ■ Natural succession 	Development (e.g. housing areas with domestic and public gardens) Predation by domestic pets Introduction of non-native species (e.g. from gardens) Fishing Hunting Changes in management practices (e.g. grazing regimes, access controls, cutting / clearing)

Identifying European sites that may be affected

3.5 Geographical Information Systems (GIS) data have been used to map the locations and boundaries of European sites using publicly available data from Natural England. All European sites lying partially or wholly within 15 km of the Local Plan Part 2 boundary have been included, to reflect the fact that policies in the Local Plan Part 2 may affect European sites that are located outside of the administrative boundary of the Plan. The 15 km distance has been agreed with Natural England for HRAs elsewhere and is considered a precautionary method of identifying European sites that could potentially be affected by development. Nevertheless, a check has been made to identify any further-distant European sites that could be significantly affected by development within Northampton due to pathways or links (e.g. hydrological or ecological) with the Plan area.

Assessment of ‘likely significant effects’ of the Local Plan Part 2

3.6 Regulation 105 of the Conservation of Habitats and Species Regulations 2017⁹ (the ‘Habitats Regulations’), requires an assessment of the ‘likely significant effects’ of a land use plan. Relevant case law helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan.

3.7 In the Waddenze case¹⁰, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Regulation 102 in the Habitats Regulations), including that:

- An effect should be considered ‘likely’, “if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site” (para 44).
- An effect should be considered ‘significant’, “if it undermines the conservation objectives” (para 48).
- Where a plan or project has an effect on a site “but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned” (para 47).

3.8 A relevant opinion delivered to the Court of Justice of the European Union¹¹ commented that:

“The requirement that an effect in question be ‘significant’ exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the

site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.”

3.9 This opinion (the ‘Sweetman’ case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered ‘trivial’ or de minimis; referring to such cases as those “that have no appreciable effect on the site”. In practice such effects could be screened out as having no likely significant effect – they would be ‘insignificant’.

3.10 The HRA screening assessment therefore considers whether the Local Plan Part 2 policies could have likely significant effects either alone or in combination.

In-combination effects

3.11 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where “a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site”. Therefore, where likely significant effects are identified for the Local Plan Part 2 it is necessary to consider whether there may also be significant effects in combination with other plans or projects.

3.12 The first stage in identifying ‘in-combination’ effects involves identifying which other plans and projects in addition to the Northampton Local Plan Part 2 may affect the European sites that are the focus of this assessment. There are a large number of potentially relevant plans and projects which could be considered. The review focuses largely on planned spatial growth within the authorities adjacent to or near Northampton, because these are the plans most likely to give rise to in-combination effects, for example in relation to water use or recreation pressure. Water Resource Management Plans have also been considered as these plans directly affect the region’s reservoirs and the rivers that feed them, including Rutland Water and the River Nene.

3.13 The following plans have been considered:

- Joint Core Strategies (Local Plan Part 1) for West Northamptonshire and North Northamptonshire;
- Local Plans (Part 2) for local authorities bordering Northampton;
- Northamptonshire County Council’s Transportation Plan and Minerals & Waste Plan;
- Neighbourhood plans within Northampton; and

⁹ SI No. 2017/2012

¹⁰ ECJ Case C-127/02 “Waddenze” Jan 2004.

¹¹ Advocate General’s Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanala 22nd Nov 2012.

■ Anglian Water's Water Resources Management Plan.

3.14 Appendix B outlines the components of each plan that could have an impact on nearby European sites. The potential for the effects of these plans to combine with the effects of the Local Plan Part 2 has been considered in the HRA screening and subsequent Appropriate Assessment.

Appropriate Assessment

3.15 Following the screening stage, if likely significant effects on European sites are unable to be ruled out, the plan-making authority is required under Regulation 105 of the Habitats Regulations 2017 to make an 'Appropriate Assessment' of the implications of the plan for European sites, in view of their conservation objectives. EC Guidance¹² states that the Appropriate Assessment should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of European sites with respect to their conservation objectives and to their structure and function.

Assessment scope

3.16 The scope of the Appropriate Assessment has been narrowed down by identifying the specific aspects of the Local Plan Part 2 that contribute to its potential for significant effects. Each Local Plan Part 2 policy and site allocation has been considered, alone and in-combination with other policies, site allocations and/or plans from neighbouring authorities.

3.17 A risk-based approach involving the application of the precautionary principle has been adopted in the assessment, such that a conclusion of 'no significant effect' has only been reached where it is considered unlikely, based on current knowledge and the information available, that a Local Plan Part 2 policy or site allocation would have a significant effect on the integrity of a European site.

3.18 For some types of impacts, the potential for likely significant effects has been determined on a proximity basis, using GIS data to determine the proximity of potential development locations to the European sites that are the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, where assumptions have been made, these are set out in Chapter 5.

3.19 A 'traffic light' approach has been used in the scoping matrix to record the likely impacts of each policy and site allocation on European sites and their qualifying habitats and species, using the colour categories shown below.

Table 3.3: Scoping of effects

Red	There are likely to be significant effects (scoped in to Appropriate Assessment).
Amber	There may be significant effects, but this is currently uncertain (scoped in to Appropriate Assessment).
Green	There are unlikely to be significant effects (scoped out of Appropriate Assessment).

3.20 The Appropriate Assessment then focuses on those policies and site allocations that have been scoped in.

Assessing the effects on site integrity

3.21 A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. those Annex 1 habitats, Annex II species, and Annex 1 bird populations for which it has been designated) and to ensure their continued viability. A high degree of integrity is considered to exist where the potential to meet a site's conservation objectives is realised and where the site is capable of self-repair and renewal with a minimum of external management support.

3.22 A conclusion needs to be reached as to whether or not the Local Plan Part 2 would adversely affect the integrity of a European site. As stated in the EC Guidance, assessing the effects on the site(s) integrity involves considering whether the predicted impacts of the Local Plan Part 2 policies (either alone or in combination) have the potential to:

- Cause delays to the achievement of conservation objectives for the site;
- Interrupt progress towards the achievement of conservation objectives for the site;
- Disrupt those factors that help to maintain the favourable conditions of the site;
- Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site;
- Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem;
- Change the dynamics of relationships that define the structure or function of the site (e.g. relationships between soil and water, or animals and plants);
- Interfere with anticipated natural changes to the site;

¹² Assessment of plans and projects significantly affecting European sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission Environment DG, November 2001.

- Reduce the extent of key habitats or the population of key species;
- Reduce the diversity of the site;
- Result in disturbance that could affect the population, density or balance between key species;
- Result in fragmentation; or
- Result in the loss of key features.

3.23 The conservation objectives for each European site (Appendix A) are generally to maintain the qualifying features in favourable condition. The Site Improvement Plans for each European site provide a high level overview of the issues (both current and predicted) affecting the condition of the European features on the site(s) and outline the priority measures required to improve the condition of the features. These have been drawn on to help to understand what is needed to maintain the integrity of the European sites.

3.24 For each European site where an uncertain or likely significant effect has been identified in relation to the Local Plan Part 2, the potential impacts have been set out and judgements made (based on the information available) regarding whether the impact will have an adverse effect on the integrity of the site. Consideration has been given to the potential for mitigation measures to be implemented that could reduce the likelihood or severity of the potential impacts such that there would not be an adverse effect on the integrity of the site.

Chapter 4

HRA screening

The findings of the screening stage

4.1 The HRA screening of the Local Plan Part 2 has determined that Appropriate Assessment is required, as likely significant effects from the plan's policies and site allocations cannot be ruled out through screening. The reasoning for this is presented below, in response to each screening stage (**Table 3.1**).

4.2 In accordance with the People over Wind case, mitigation measures have not been taken into account in the screening assessment.

Is the Local Plan Part 2 of a type that could possibly have any (positive or negative) effect on a European site?

4.3 The Local Plan Part 2 will result in several of the types of activity that could have impacts on European sites (**Table 3.2**). The Local Plan Part 2 will result in new development (e.g. housing, employment and infrastructure), which will have associated impacts (e.g. changes to traffic distribution, types or distribution of recreation, water abstraction and discharge, light or noise).

Is the Local Plan Part 2 directly connected with or necessary to the management of any European sites?

4.4 No; the Local Plan Part 2 is not connected with or necessary to the management of any European sites.

Which European sites could be potentially adversely affected?

4.5 Only one European site is located within 15 km of the Northampton Local Plan Part 2 boundary: the Upper Nene Valley Gravel Pits SPA and Ramsar site. Although not within the 15 km buffer zone, Rutland Water SPA and Ramsar site, located 41 km from the edge of the Local Plan Part 2 boundary, has also been included in the screening assessment. This is because the reservoir is a primary source of urban water supply for Northamptonshire and could be affected by changes in water demand, for example as a result of new homes. **Figure 4.1** shows the location of the two sites.

4.6 The attributes of the Upper Nene Valley Gravel Pits SPA and Ramsar site and Rutland Water SPA and Ramsar site are

set out in Appendix A. These have been identified with reference to Standard Data Forms for the SPAs, Ramsar Information Sheets¹³ for the Ramsar sites, and Natural England's Site Improvement Plans¹⁴.

4.7 Natural England's conservation objectives¹⁵ for the SPAs have also been reviewed. These state that site integrity must be maintained or restored by maintaining or restoring the habitats of qualifying features, the supporting processes on which they rely, and populations of qualifying species.

4.8 In accordance with the Holohan judgment, the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies has been considered in relation to the achievement of the conservation objectives. The potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, has been fully considered in this HRA (see final column of Appendix A for each European site).

Is the Local Plan Part 2 likely to have a significant adverse effect on any European site alone?

4.9 Likely significant effects from the Local Plan Part 2 cannot be ruled out at the screening stage: the Local Plan Part 2 allocates development across Northampton, and both Rutland Water SPA and Ramsar site and the Upper Nene Valley Gravel Pits SPA and Ramsar site have been identified as being sensitive to the types of activities that result from development.

Is the Local Plan Part 2 likely to have a significant adverse effect on any European site in combination with other plans or projects?

4.10 Likely significant effects from the Local Plan Part 2 in combination with other plans and projects cannot be ruled out at the screening stage. Neighbouring authorities have also allocated development that could affect Rutland Water SPA and Ramsar site or the Upper Nene Valley Gravel Pits SPA and Ramsar site.

¹³ Obtained from the Joint Nature conservation Committee website (www.jncc.gov.uk/)

¹⁴ Obtained from the Natural England website (www.naturalengland.org.uk/)

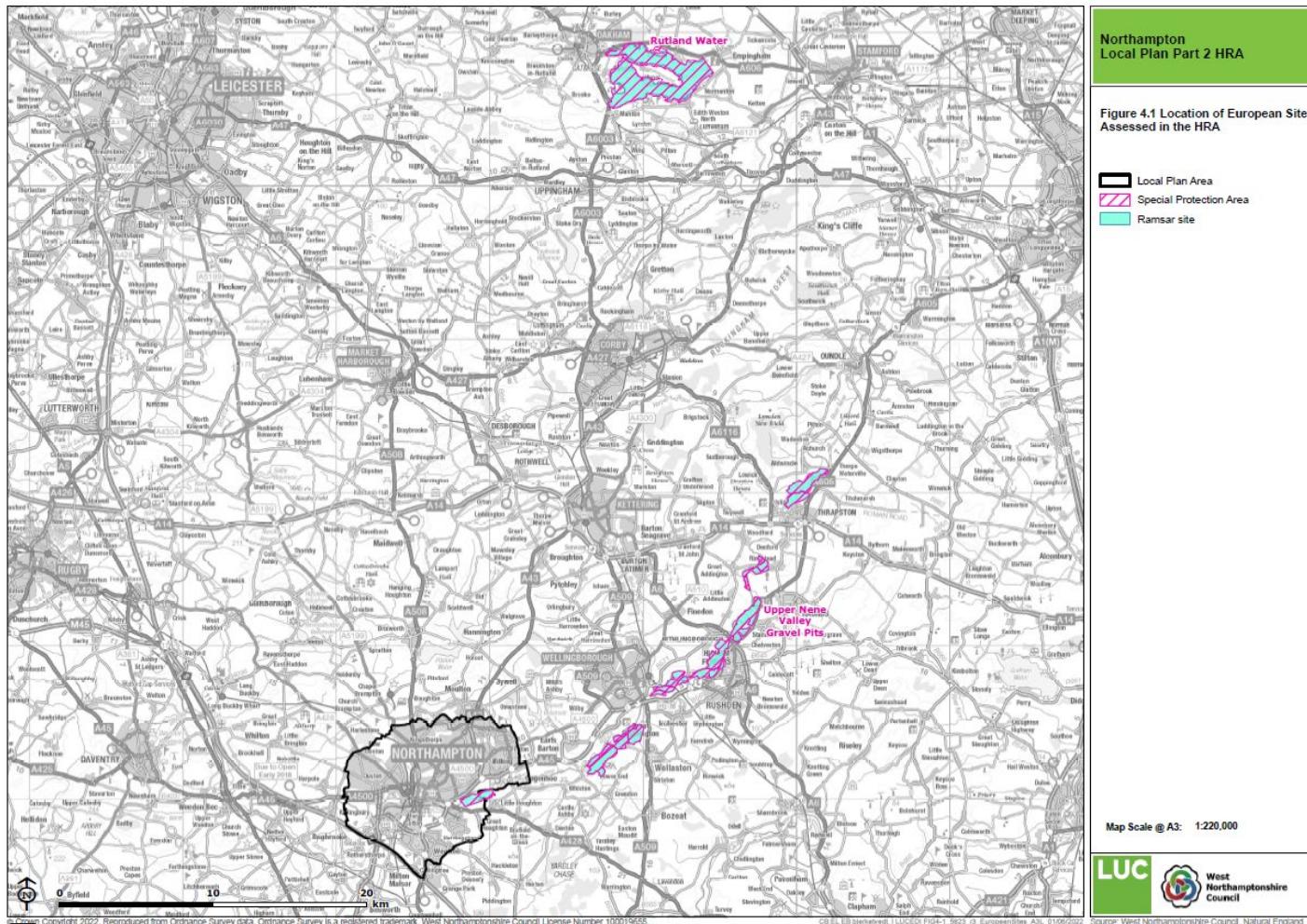
¹⁵ Obtained from Natural England website
<http://publications.naturalengland.org.uk/category/6490068894089216>

Chapter 4

HRA screening

Northampton Local Plan Part 2 HRA Report June 2022

Figure 4.1: Location of European sites



Chapter 5

Appropriate Assessment

The findings of the Appropriate Assessment stage

5.1 The HRA screening has identified the need for Appropriate Assessment, as likely significant effects from the Local Plan Part 2 (alone or in combination with other projects or plans) cannot be ruled out without further assessment.

5.2 The scope of the Appropriate Assessment has been narrowed down by considering each Local Plan Part 2 policy in turn, to determine whether they would result in the type of development that could have an effect on a European site; this is set out in **Appendix C**. For each type of impact that has been identified, the assessment considers the effects on each of the two European sites, the elements of the Local Plan Part 2 (and other plans or projects, where relevant) that would have those effects, and any mitigation or safeguards in place that would reduce the effects. The Appropriate Assessment then considers whether there would be an adverse effect on the integrity of a European site.

Physical habitat loss or damage

5.3 Physical habitat loss or damage at a European site can occur when a new development physically encroaches on the boundary of that European site.

5.4 Although the qualifying features of the SPA/Ramsar sites are birds, they rely on the supporting habitat within the site boundaries (and functionally-linked land (FLL) beyond the site boundaries, which is assessed separately below), and could be affected by physical habitat loss or damage.

Rutland Water SPA and Ramsar site

5.5 Rutland Water SPA and Ramsar site is not located within the boundary of the Local Plan Part 2 area, and therefore it will not be subject to any physical habitat loss or damage from any Northampton site allocations or other development and does not need to be considered further.

5.6 **There will be no adverse effects on the integrity of Rutland Water SPA and Ramsar site as a result of physical habitat loss or damage, either alone or in combination with other plans or projects.**

Upper Nene Valley Gravel Pits SPA and Ramsar site

5.7 The southern end of the Upper Nene Valley Gravel Pits SPA and Ramsar site falls partly within the Plan area and therefore potential habitat loss or damage has been considered in relation to the Local Plan Part 2.

5.8 None of the allocated sites fall within the borders of this European site; however, some of the Local Plan Part 2's policies permit new development outside of the site allocations. In most cases development permitted by those policies is limited to identifiable areas such as the University campus, existing employment areas, the town centre or wider central area.

5.9 The following policies permit new development outside of identifiable areas:

- *Policy 12: Development of main town centre uses* permits the regeneration of unallocated sites beyond the town centre and central area, for housing and mixed use development;
- *Policy 19: New retail developments and retail impact assessment* permits retail development at edge-of-centre and some out-of-centre sites; and
- *Policy 24: Community services and facilities* permits new or extended community facilities.

5.10 Although these policies could in theory permit development within the SPA and Ramsar site, safeguards provided by other policies within the Local Plan Part 2 would make this unlikely to occur:

- *Policy 29B: Nature conservation* states that:

"The Council requires development to protect, maintain and enhance biodiversity and geodiversity. All proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment. If harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for, planning permission will be refused." and

"The Council will seek the protection or enhancement of the ecological network in proportion to the site's designation status, the contribution it makes to the ecological network and take account of considerations set out below:

i. Sites of national or international importance - Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest are of international and/or national importance and development affecting them will be expected to avoid causing adverse effects."

- *Policy 30: Upper Nene Valley Gravel Pits Special Protection Area* requires that:

"Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.

Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the UNVGP SPA Supplementary Planning Document."

5.11 Policy 29A also provides general protection for biodiversity.

5.12 Development within the SPA/Ramsar that would have adverse effects on birds would therefore not be permitted.

5.13 With safeguards provided by policies within the Local Plan Part 2, there will be no adverse effects on the integrity of Upper Nene Valley Gravel Pits SPA and Ramsar site, as a result of physical habitat loss or damage, either alone or in combination with other plans or projects.

Loss of functionally-linked land

5.14 Habitat loss (including fragmentation) could affect the integrity of a European site if it occurs in an area that supports a qualifying species population of a European site, for example the loss of an area used for offsite foraging or roosting by a site's qualifying bird species. Habitats outside the SPA/Ramsar that support its qualifying features are referred to as functionally-linked land (FLL).

5.15 The potential effect of air pollution on FLL is discussed under 'Air pollution' (paragraph 5.136).

Rutland Water SPA and Ramsar site

5.16 The site's qualifying species are birds so it could therefore be affected by the loss of FLL. Supporting habitat for the site's qualifying species are: open water; neutral grassland; fen / marsh swamp; and broadleaved, mixed and

yew woodland¹⁶. However, due to the distance (41km) of the site from the Plan area, it is not considered that significant FLL will lie within the Local Plan Part 2 area. The Local Plan Part 2 area is relatively urban and any potential areas of habitat for waterbirds (for example grassland) are more likely to be associated with the nearby Upper Nene Valley Gravel Pits SPA and Ramsar site than Rutland Water, which has suitable FLL much closer to it.

5.17 There will be no adverse effects on the integrity of Rutland Water SPA and Ramsar site, as a result of loss of functionally-linked land, either alone or in combination with other plans or projects.

Upper Nene Valley Gravel Pits SPA and Ramsar site

5.18 Natural England's Supplementary Advice on Conserving and Restoring Site Features for the SPA¹⁷ identifies the following species for which FLL is important:

- Great Bittern: feed within and outside the SPA boundary, mainly around Titchmarsh, Grendon and Stanwick. These locations are all outside the Local Plan Part 2 area, therefore FLL for Great Bittern are not considered likely to be affected by the Local Plan Part 2;
- Golden Plover: Feed in agricultural land surrounding their main roost locations at Stanwick, Earls Barton (Summer Leys) and Northamptonshire Washlands, and often fly many kilometres to feed. Northamptonshire Washlands is within the Local Plan Part 2 area, therefore FLL for Golden Plover could be affected by the Local Plan Part 2; and
- Lapwing: have a similar distribution to Golden Plover, therefore FLL for Golden Plover that could be affected by the Local Plan Part 2 are also relevant to Lapwing.

5.19 Wigeon feed at similar habitat as Golden Plover but do not travel as far to feed, so are not considered to make significant use of offsite habitat.

5.20 Agricultural land, particularly where close to 'Northampton Washlands' (the portion of the SPA that falls within the Local Plan Part 2 area) could therefore be considered to be FLL for Golden Plover and Lapwing from Upper Nene Valley Gravel Pits SPA and Ramsar site.

5.21 As part of the West Northamptonshire Joint Core Strategy (WNJCS) HRA¹⁸ and in consultation with Natural England, survey work¹⁹ was carried out in order to understand the potential effects of the Joint Core Strategy on FLL used by

Golden Plover and Lapwing. The findings of this work provided the basis for further discussion between the West Northamptonshire Joint Planning Unit and Natural England to identify areas that could potentially be developed and whether the adverse effects on the SPA/Ramsar qualifying bird species could be avoided and/or mitigated. One outcome of this work was a map, produced to show the quality of FLL for Golden Plover and Lapwing to the south east of Northampton. The FLL identified in this map has been digitised by LUC and overlaid with the Local Plan Part 2's allocated sites, as shown in **Figure 5.1**. Note that, as habitats can change, this only provides an indication of areas more or less likely to be FLL.

5.22 One allocated site includes areas that were identified as optimal or sub-optimal habitat for Golden Plover and/or Lapwing and could therefore be functionally linked to the SPA/Ramsar:

- *LAA1098: The Green, Great Houghton*
Allocates c.800 homes on habitat that has been identified as mostly optimal habitat with small areas of sub-optimal/unsuitable habitat.

5.23 The original site boundary of LAA0204: *The Farm, Hardingstone* incorporated a small area of habitat that had previously been identified as optimal habitat, but the site boundary has been revised following discussions with Natural England (see **Appendix E**).

5.24 This site is allocated for development under the following policies:

- *Policy 13: Residential and other residential led allocation*
Allocates the sites and defines the quantum of housing development; and
- *Policy 41: The Green, Great Houghton*
Sets principles for development at site LAA1098.

5.25 None of the other allocated sites have habitat that was identified in the WNJCS study as being potentially used by Golden Plover / Lapwing. However, given the range and mobility of the species, and the potential for habitat change, it is assumed that FLL could occur in areas not previously identified as suitable habitat. Policies that allocate sites (Policies 13, 17A and 26) as well as unallocated smaller scale development could therefore result in the loss or fragmentation of areas providing optimal or sub-optimal FLL for Golden Plover and/or Lapwing:

- *Policy 12: Development of main town centre uses*
Permits the regeneration of unallocated sites beyond the

¹⁶ Rutland Water SPA Conservation Objectives supplementary advice (2018): <http://publications.naturalengland.org.uk/publication/4978639963684864>

¹⁷ Upper Nene Valley Gravel Pits SPA Conservation Objectives supplementary advice (2017)
<http://publications.naturalengland.org.uk/publication/5495529882517504>

¹⁸ West Northamptonshire Joint Core Strategy Pre-Submission Appropriate Assessment, Environ UK Ltd, 2011.

¹⁹ Survey Work to Support the Appropriate Assessment for the West Northamptonshire Joint Core Strategy, Environ UK Ltd, 2010.

town centre and central area, for housing and mixed use development;

- **Policy 18: Supporting new employment developments and schemes within and outside safeguarded areas**
Permits employment development at sites where employment activities would not cause harm to adjoining land uses and occupiers;
- **Policy 19: New retail developments and retail impact assessment**
Permits retail development at edge-of-centre and some out-of-centre sites; and
- **Policy 24: Community facilities**
Permits new or extended community facilities

5.26 The loss of FLL is susceptible to cumulative effects as the loss of multiple areas of habitat fragments the habitat available. Other plans that could also result in the loss of FLL include:

- West Northamptonshire Joint Core Strategy:
Northampton South of Brackmills SUE lies in an area identified as optimal / suboptimal for Golden Plover and/or Lapwing (adjacent to LAA1098). The plan also permits development outside allocated sites e.g. transport improvements;
- South Northamptonshire Local Plan Part 2: the Plan area includes habitat identified as optimal / suboptimal for Golden Plover and/or Lapwing that could be affected, should development be permitted there; and
- Northamptonshire Transport Plan: the Plan area includes habitat identified as optimal / suboptimal for Golden Plover and/or Lapwing that could be affected, should development be permitted there.

5.27 These plans have themselves been subject to HRA.

5.28 Protection against loss of FLL, where the potential has not been ruled out (i.e. within site LAA1098 or other un-allocated sites) is provided by several policies in the Local Plan Part 2:

- **Policy 29A Supporting and enhancing biodiversity** states that:

"Development that does not achieve biodiversity net gain, and fragments habitats and links will be refused."

- **Policy 29B Nature conservation** states that:

"The Council requires development to protect, maintain and enhance biodiversity and geodiversity. All proposals likely to affect biodiversity will be expected to assess

their impact through an ecological assessment. If harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for, planning permission will be refused." and

"The Council will seek the protection or enhancement of the ecological network in proportion to the site's designation status, the contribution it makes to the ecological network and take account of considerations set out below:

- i. Sites of national or international importance - Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest are of international and/or national importance and development affecting them will be expected to avoid causing adverse effects."

- **Policy 30 Upper Nene Valley Gravel Pits Special Protection Area** states that:

"Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified. Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment." and

"Sites that could potentially be functionally linked land associated with the SPA will need to undertake overwintering bird surveys early in the planning process ahead of submitting an application." "

- **Policy 41 The Green, Great Houghton**, which set principles for site LAA1098, requires that:

"Winter surveys are undertaken to identify whether the site is used by over-wintering Golden Plover / Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat."

"Development must adhere to Policy 30 of this Plan, in particular with reference to recreational disturbance and functionally linked land associated with the Upper Nene Valley Gravel Pits Special Protection Area." and

"Proposals must be informed by a masterplan for the whole allocation which will be expected to: ...e. Provide a SANG within the area identified in Figure 20 [northern part of sites] which provides the following: i. Protection,

enhancement and / or creation of habitats in line with other policies of this plan..."

5.29 Policy 29A also provides general protection for biodiversity. Policies within the West Northamptonshire Joint Core Strategy also provide protection against the loss of FLL and therefore the potential for in-combination effects (BN4 specifically and BN2 and BN8 generally):

- *Policy BN4 Upper Nene Valley Gravel Pits Special Protection Area* provides more comprehensive protection from the potential loss of or damage to SPA/Ramsar habitat:

"New development will need to demonstrate through the development management process that there will be no significant adverse effects upon the integrity of the Special Protection Area and Ramsar site and the species for which the land is designated...either as a direct result of the development alone or in combination."

- *Policy BN2 Biodiversity* safeguards designated sites and encourages a net gain in biodiversity; and
- *Policy BN8 The River Nene Strategic River Corridor* provides general protection for the biodiversity of the River Nene corridor.

5.30 The Joint Core Strategy policies apply to development in both Northampton and South Northamptonshire and the same wording as JCS policy BN4 is included in Policy NE1 of the South Northamptonshire Local Plan.

5.31 It is considered that the requirements set out in the Local Plan Part 2 Policies 29B and 30, to consider effects on FLL and undertake surveys, provide sufficient mitigation for potential effects on FLL.

5.32 At LAA1098, where the location and scale of development mean that the design principles for the site will affect the scale of effects on FLL, Policy 41 reiterates the need for bird surveys and ensures that the masterplan for the site takes into account FLL (and recreation pressure; see below). Mitigation for loss of FLL, if required, could involve the enhancement of another area of habitat, a similar distance from the SPA/Ramsar and of the same area or greater, such that sub-optimal/unsuitable habitat becomes optimal for Golden Plover or Lapwing, to ensure that the overall quality and availability of feeding resources for these species is maintained.

5.33 At some sites, habitat may not currently be suitable habitat for SPA bird species, but could become suitable in the

future. For example, there is a small area of land adjacent to site LAA0204 The Farm, Hardingstone which was previously identified as 'optimal' habitat but which, in its current state, does not provide suitable habitat for Golden Plover or Lapwing as habitat succession has started to take place. However, it does not negate the potential for this area of land to be restored to a condition where it could function as supporting habitat for the SPA. However, if the situation changed, the safeguards within the policies provide assurance that AEOI could be avoided or mitigated, if necessary.

5.34 Where surveys identify other sites that contain habitat that is optimal / suboptimal for Golden Plover and/or Lapwing, development will require project-level Appropriate Assessment, with the objective of ensuring that such development proposals do not give rise to adverse effects on integrity either alone or in-combination with other plans or projects.

5.35 With mitigation provided by policies within the Joint Core Strategy and the Local Plan Part 2, there will be no adverse effects on the integrity of Upper Nene Valley Gravel Pits SPA and Ramsar site as a result of loss of FLL, either alone or in combination with other plans or projects.

Changes to bird sightlines

5.36 Many birds rely on good sightlines to detect predators and during take-off. Tall buildings or structures in close proximity to European sites designated for bird species could affect the integrity of the site by reducing bird sightlines and therefore the suitability of the site's habitat.

Rutland Water SPA and Ramsar site

5.37 As Rutland Water SPA and Ramsar site is not located within the Plan area, it will not be affected by changes to bird sightlines resulting from the Local Plan Part 2.

5.38 There will be no adverse effects on the integrity of Rutland Water SPA and Ramsar site, as a result of changes to bird sightlines, either alone or in combination with other plans or projects.

Upper Nene Valley Gravel Pits SPA and Ramsar site

5.39 Work undertaken for the HRA of the West Northamptonshire Joint Core Strategy considered the sensitivity of the Upper Nene Valley Gravel Pits SPA and Ramsar bird species to changes to sightlines²⁰. This work concluded that maintenance of unobstructed lines of sight is particularly important for Golden Plover and Lapwing. The

²⁰ Environ, 2010, Survey work to support the Appropriate Assessment for the West Northamptonshire Joint Core Strategy, Report of elements 3 and 4.

following allocated sites are within 250m of the Upper Nene Valley Gravel Pits SPA and Ramsar site (**Figure 5.2**) and would therefore need to mitigate any potential effects on bird sightlines, in accordance with Joint Core Strategy Policy BN4:

■ **LAA1101: Land at Waterside Way**

An employment site 45m away that would advance the urban edge towards the European site; and

■ **LAA1107: Former Abington Mill Farm, land off Rushmere Road**

A residential site 150m away that would advance the urban edge towards the European site.

5.40 However, taking their immediate surroundings into consideration, both sites are afforded a degree of screening; by existing buildings (LAA1101), the A45 road (LAA1107), and the trees at the edges of these (both). It is likely that sensitive design of these sites would enable development to occur without adversely affecting bird sightlines.

5.41 These sites are allocated for development by:

■ **Policy 13: Residential and other residential-led allocation**
Defines the quantum of development at LAA1107;

■ **Policy 17A: Employment allocation**
Identifies site LAA1101 for (employment) development; and

■ **Policy 46: Abington Mill Farm**
The site-specific policy for LAA11017.

5.42 Other policies (or plans) that permit development outside of allocated sites could also result in development within 250m of the SPA/Ramsar.

5.43 The Local Plan Part 2 provides mitigation within the following policies:

■ **Policy 29B: Nature conservation**

"The Council requires development to protect, maintain and enhance biodiversity and geodiversity. All proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment. If harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for, planning permission will be refused." and

"The Council will seek the protection or enhancement of the ecological network in proportion to the site's designation status, the contribution it makes to the ecological network and take account of considerations set out below:

- i. Sites of national or international importance - Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest are of international and/or national

importance and development affecting them will be expected to avoid causing adverse effects."

■ **Policy 30: Upper Nene Valley Gravel Pits Special Protection Area**

"Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.

Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the UNVGP SPA Supplementary Planning Document." and

"In order to protect sightlines for birds included within the Upper Nene Gravel Pits Special Protection Area, new development within a 250m zone of the Special Protection Area shown on the proposals map must undertake an assessment to demonstrate that it will not have a significant adverse effect on birds within the area or, if directly adjacent to existing buildings, should reflect surrounding building heights."

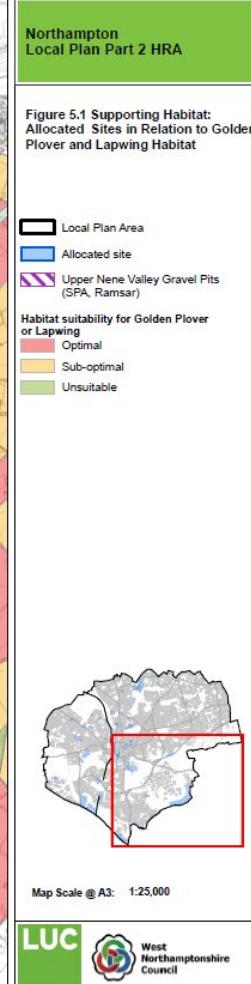
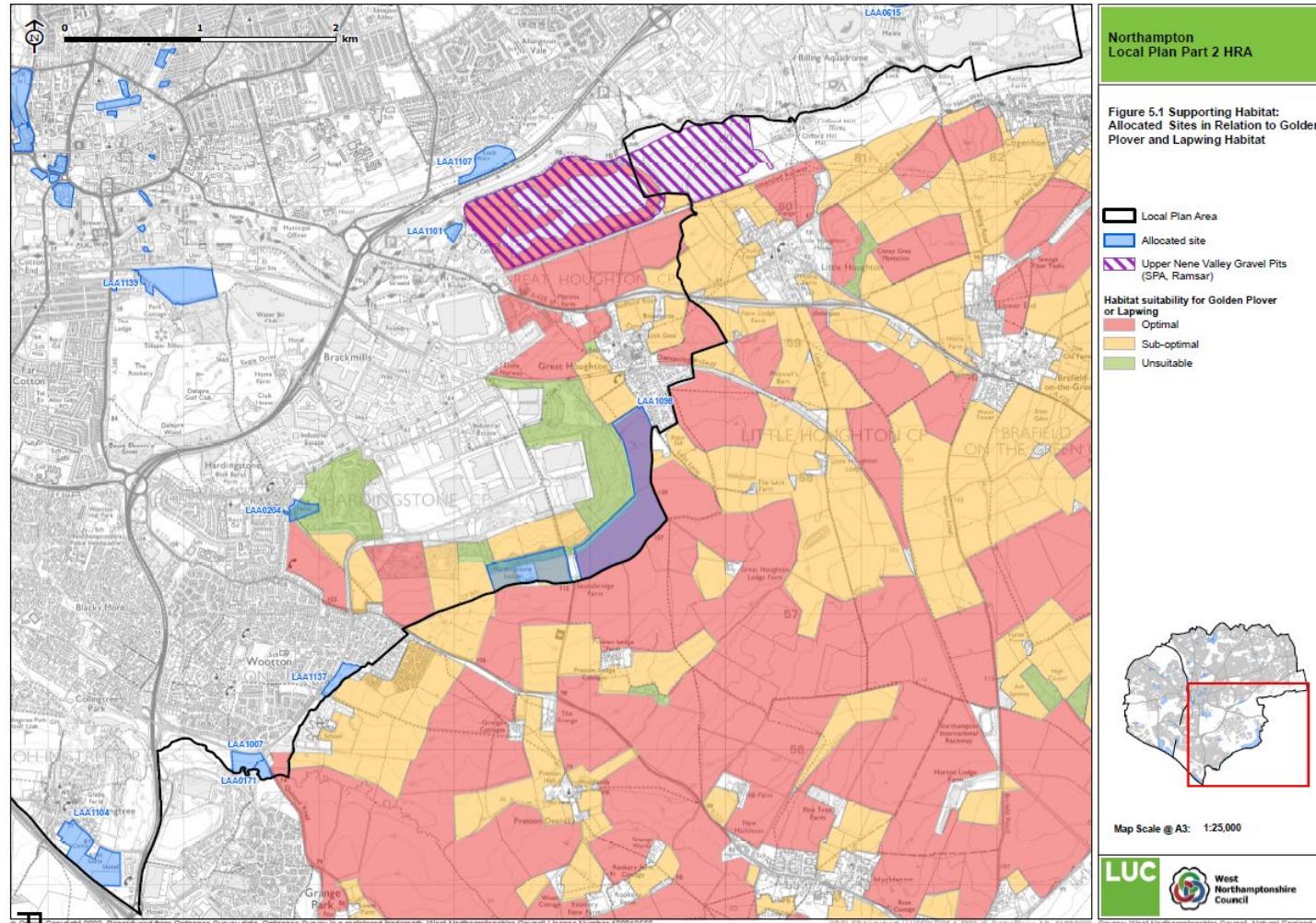
5.44 Policy BN4 Upper Nene Valley Gravel Pits Special Protection Area, within the West Northamptonshire Joint Core Strategy also provides similar wording regarding sightlines as that set out in Policy 30.

5.45 In addition, any unallocated development proposals coming forward (i.e. Policies 12 or 19) within 250m of the Upper Nene Valley Gravel Pits SPA and Ramsar site would require project-level Appropriate Assessment, with the objective of ensuring that such development proposals do not give rise to adverse effects on integrity either alone or in-combination with other plans or projects.

5.46 With mitigation required by policies within the Local Plan Part 2, there will be no adverse effects on the integrity of Upper Nene Valley SPA and Ramsar site, as a result of changes to bird sightlines, either alone or in combination with other plans or projects.

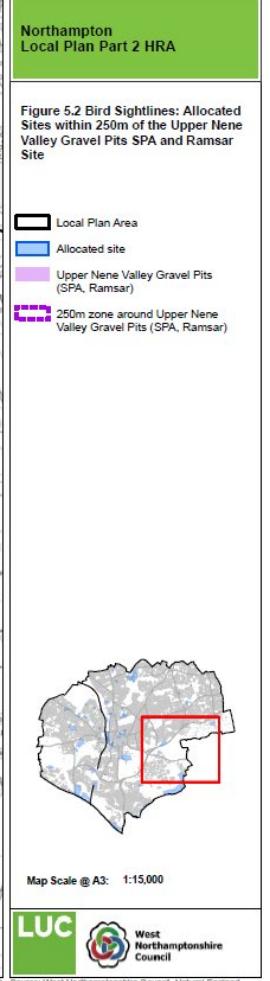
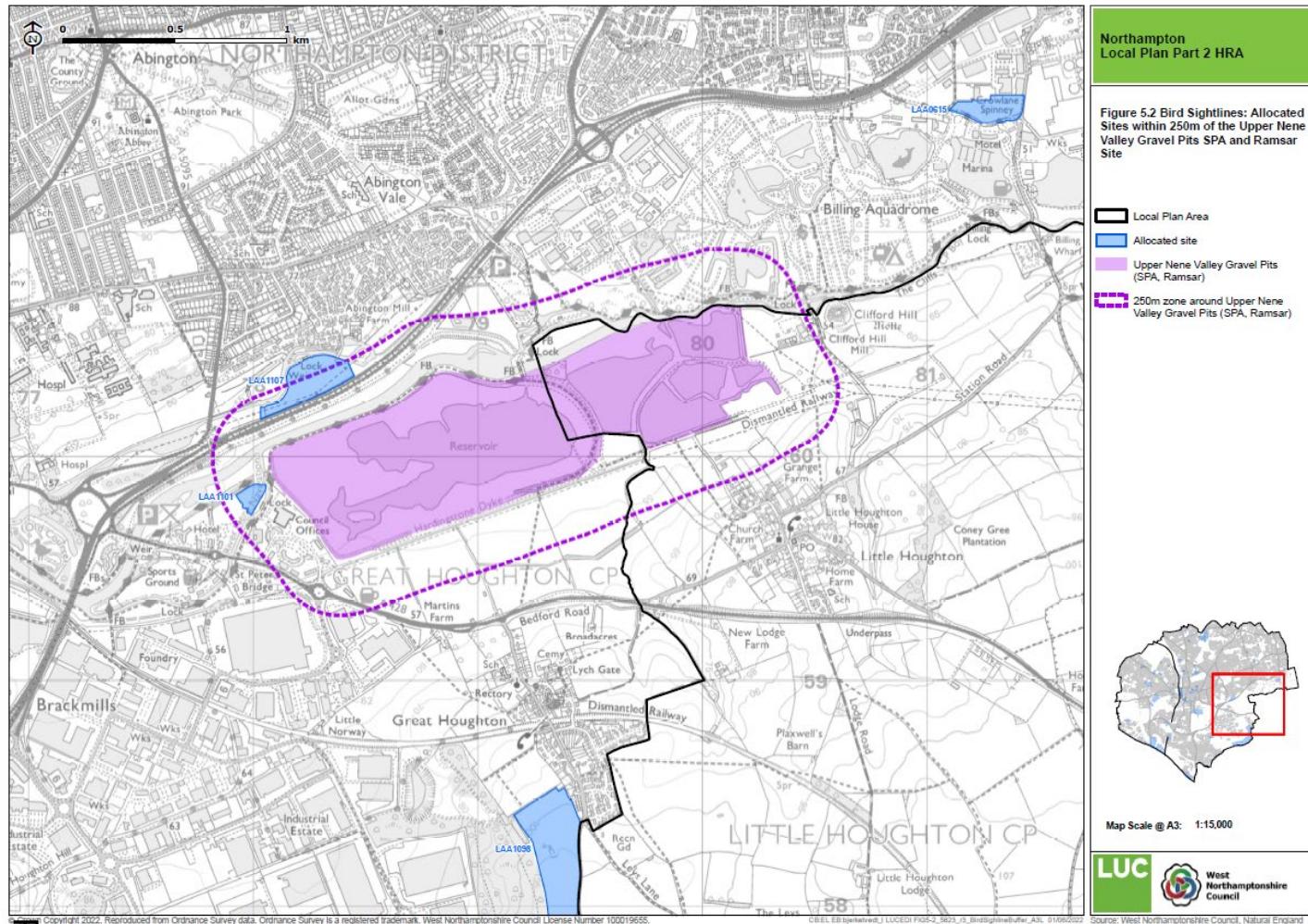
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Figure 5.1: Supporting habitat: allocated sites in relation to Golden Plover and Lapwing habitat



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Figure 5.2: Bird sightlines: allocated sites within 250m of the Upper Nene Valley Gravel Pits SPA and Ramsar site



Fragmentation

5.47 Fragmentation could occur where development splits up physically- or functionally-continuous tracts of habitat (within the SPA/Ramsar sites or offsite) into smaller, remnant patches with adverse effects on their functionality and the integrity of the species populations they support.

Rutland Water SPA and Ramsar site

5.48 As Rutland Water SPA and Ramsar site is not located within the Plan area, it will not be affected by fragmentation as a result of the Local Plan Part 2.

5.49 There will be no adverse effects on the integrity of Rutland Water SPA and Ramsar site, as a result of fragmentation, either alone or in combination with other plans or projects.

Upper Nene Valley Gravel Pits SPA and Ramsar site

5.50 Fragmentation of habitats within the SPA and Ramsar site will not occur as this would require the loss or damage of habitats within the European site (see paragraphs 5.6 to 5.12).

5.51 Development within areas of FLL (i.e. that used by Golden Plover or Lapwing in the south east of the Local Plan Part 2 area; see **Figure 5.1**) could cause fragmentation by reducing the size of habitat area or by physically splitting up habitats.

5.52 Policy 30 draws attention to the potential for the effects of fragmentation on FLL: "...adverse effects could include the loss or fragmentation of functionally-linked land". These effects have been assessed under 'loss of FLL' (above).

5.53 There will be no adverse effects on the integrity of Upper Nene Valley Gravel Pits SPA and Ramsar site, as a result of fragmentation, either alone or in combination with other plans or projects.

Non-physical disturbance

5.54 Noise, vibration and light effects, for example from construction or new developments, can affect bird and other sensitive species. However, development must be close to the European sites or their FLL, for these effects to be significant.

Rutland Water SPA and Ramsar site

5.55 Water SPA and Ramsar site is too far (41km) from the Local Plan Part 2 area for the plan's development to give rise to noise, vibration or light disturbance that would affect the site.

5.56 There will be no adverse effects on the integrity of Rutland Water SPA and Ramsar site, as a result of non-physical disturbance, either alone or in combination with other plans or projects.

Upper Nene Valley Gravel Pits SPA and Ramsar site

5.57 Sensitivities identified in the citations for the Upper Nene Valley Gravel Pits SPA and Ramsar site include "*other urbanisation, industrial and similar activities*" (SPA Standard Data Form) and "*unspecified development: urban use – activities connected with ongoing urban development cause significant disturbance to wintering birds if unmanaged*" (Information Sheet on Ramsar Wetlands). This site is therefore sensitive to non-physical disturbance.

5.58 It is considered that the effects of noise, vibration and light on this European site only have the potential to be significant if the source of disturbance is within 2km of its boundary. This is consistent with the SPA's consultation zone for all proposals likely to generate significant noise and for large commercial / industrial development, as set out in the Upper Nene Valley Gravel Pits Supplementary Planning Document (SPD), 2015²¹. Significant noise in this context is illustrated in the SPD by the example 'clay pigeon shoot'.

5.59 Five allocated sites are within 2km of the SPA/Ramsar (**Figure 5.3**):

- *LAA0615: Crow Lane North*
Employment site, c. 1.3km away;
- *LAA1098: The Green, Great Houghton*
Residential site (c.800 homes), c.1.2km away;
- *LAA1101: Land at Waterside Way*
Employment site, c.45m away;
- *LAA1107: Former Abington Mill Farm, land off Rushmere Road*
Residential site (125 homes), c.150m away; and
- *LAA1139: Ransome Road*
Residential site (500 homes), c.1.9km away.

5.60 When the physical surroundings of each site are taken into consideration, the potential for significant effects is unlikely. LAA1098 and LAA1139 are on the edge of the 2km buffer and separated from the SPA/Ramsar by major roads and some urban development. At LAA1098, most of the area of site that is within the 2km buffer will be used for ecological enhancement and not built upon. These sites are unlikely to result in significant non-physical disturbance.

²¹ Upper Nene Valley Gravel Pits Supplementary Planning Document, August 2015.

5.61 Sites LAA1101 and LAA1107 are closer to the SPA/Ramsar. As identified in relation to bird sightlines, both sites are afforded a degree of screening; by existing buildings (LAA1101), the A45 road (LAA1107), and the trees at the edges of these (both). LAA0615 is separated by some urban development and trees, although much of the area between it and the SPA/Ramsar is open water. These sites could result in non-physical disturbance of the SPA/Ramsar.

5.62 These sites are allocated for development under the following policies:

- *Policy 13: Residential and other residential led allocation*
Allocates the sites and defines the quantum of housing development;
- *Policy 17A: Employment allocations*
Allocates the sites and defines the quantum of employment development; and
- *Policy 46: Abington Mill Farm*
The site-specific policy for LAA1107.

5.63 Policies 12, 18, 19 and 24 also permit development outside of allocated sites.

5.64 Individually, these residential or employment developments may not generate significant noise, vibration or light. However, without mitigation, they could contribute to a general urbanising effect in combination with other policies that permit development outside allocated sites (Policies 12, 19 & 24) and development from other plans:

- West Northamptonshire Joint Core Strategy: permits development outside allocated sites in Northampton e.g. transport improvements;
- South Northamptonshire Part 2 Local Plan: parts of the north of the District are within 2km of the SPA/Ramsar;
- Northamptonshire Transport Plan: identifies transport schemes in Northampton and South Northamptonshire and
- Northamptonshire Minerals & Waste Plan: an area adjacent to the SPA/Ramsar (but outside Northampton) has been identified for gravel extraction.

5.65 These plans have themselves been subject to HRA.

5.66 The Local Plan Part 2 provides mitigation within the following policies:

- *Policy 29B: Nature conservation*

"The Council requires development to protect, maintain and enhance biodiversity and geodiversity. All proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment. If harm to biodiversity cannot be avoided, adequately mitigated,

or, as a last resort, compensated for, planning permission will be refused. " and

"The Council will seek the protection or enhancement of the ecological network in proportion to the site's designation status, the contribution it makes to the ecological network and take account of considerations set out below:

i. Sites of national or international importance - Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest are of international and/or national importance and development affecting them will be expected to avoid causing adverse effects."

- Policy 30: Upper Nene Valley Gravel Pits Special Protection Area

"Upper Nene Valley Gravel Pits Special Protection Area

Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.

Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the UNVGP SPA Supplementary Planning Document. " And

"...adverse effects could include the loss or fragmentation of functionally-linked land, non-physical disturbance (noise, vibration or light), and impacts due to water runoff."

5.67 The supporting text for Policy 30 which provides the following guidance:

"...for sites in close proximity to the SPA, consideration should be given to phasing the construction period, whereby the most intensive/ noisy part of development avoids the sensitive winter season (1st October – 31st March inclusive)."

5.68 Policy 29A and policies within the West Northamptonshire Joint Core Strategy (BN2, BN4 & BN8) also provide general protection. In line with the requirements of these policies, development at sites LAA0615, LAA1101 and LAA1107 and any other developments with the potential to

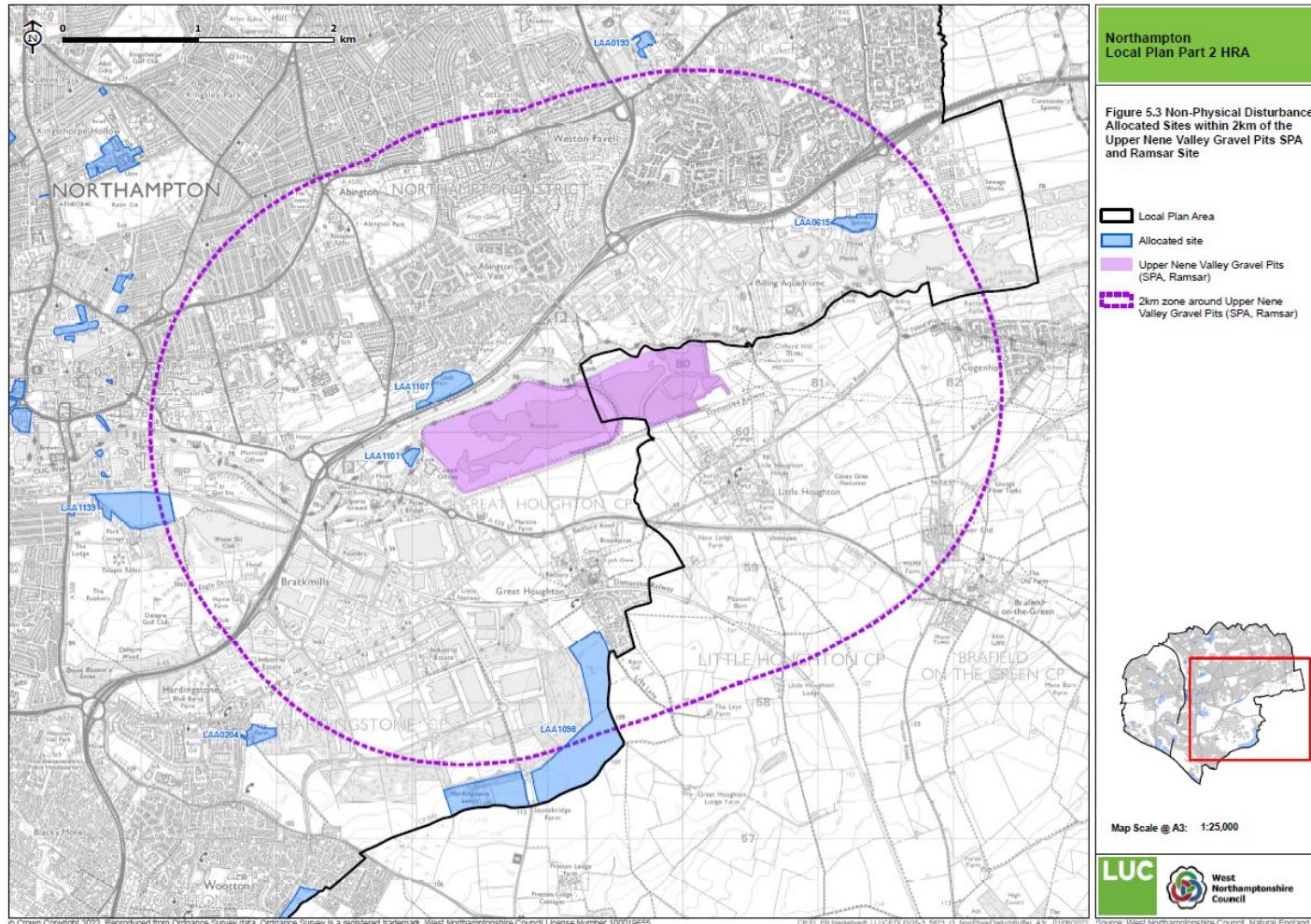
result in non-physical disturbance (for example those in locations with little existing screening from the SPA/Ramsar, or larger sites with the potential to have an urbanising effect) will need to demonstrate that they will not have a significant effect on the European site, for example through sensitive design.

5.69 In addition, any unallocated development proposals coming forward e.g. under Policies 9, 12, 18 or 19 within 2km of the SPA/Ramsar would require project-level Appropriate Assessment, with the objective of ensuring that such development proposals do not give rise to adverse effects on integrity either alone or in-combination with other plans or projects.

5.70 With mitigation required by policies within the Local Plan Part 2 and Joint Core Strategy, there will be no adverse effects on the integrity of Upper Nene Valley Gravel Pits SPA and Ramsar site, as a result of non-physical disturbance, either alone or in combination with other plans or projects.

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Figure 5.3: Non-physical disturbance: allocated sites within 2km of the Upper Nene Valley Gravel Pits SPA and Ramsar site



Recreation pressure

5.71 Recreational activities can have an adverse impact on the integrity of a European site, for example from: physical damage, including erosion and trampling of habitat, or fires; and the disturbance of fauna, including from human presence, dog walking or water sports.

5.72 Where the Local Plan Part 2 would be likely to increase the number of people living close to or visiting sensitive European sites, the potential for increased recreation pressure has been assessed. Consideration has been given to factors such as the characteristics and current recreational use of European sites and their accessibility. The nature of development proposed has also been taken into account. For example, employment sites are considered unlikely to result in a significant increase in recreation pressure as employees will be at work for the majority of the time they are there.

Rutland Water SPA and Ramsar site

5.73 Rutland Water is 41km from the Local Plan Part 2 area but is a tourism destination known for its water sports that attracts people from a wide area. Public access and disturbance has been identified as a threat to the SPA (see Appendix A).

5.74 There is some historic visitor data available for Rutland Water²². This data were collected as part of a PhD thesis in 1992; therefore it should be used with a degree of caution. This study found the majority of visitors (c.81%) to be on day trips and that around half of all visitors had visited three or four times in the previous 12 months. The study found that approximately 33% of visitors lived less than 19 miles (approximately 30.5km) away. Some of the visitors to the Rutland Water will therefore be from the Plan area.

5.75 The SPA and Ramsar site at Rutland Water comprises open water, along with terrestrial/wetland habitats at the western edge of the lake. The SPA/Ramsar terrestrial/wetland habitats are managed as a Wildlife Trust nature reserve. Visitor numbers to the whole SPA/Ramsar are managed to minimise impacts on wildlife: access to the nature reserve is only accessible by purchasing a permit, and dogs are excluded from the most sensitive areas of the reserve²³; access to the open water is restricted through the use of permits for water sports or fishing²⁴. The rest of the lake edge (not within the SPA/Ramsar site) is freely accessible to visitors

(e.g. walkers and cyclists). Only a portion of the overall visits to Rutland Water will therefore be to within the SPA and Ramsar boundary.

5.76 It is considered that Rutland Water is too far from the Plan area for the Local Plan Part 2 alone to result in significant increases in visitor numbers to the SPA and Ramsar site. The Local Plan Part 2 could contribute to an increase in visitor numbers in combination with development plans from other authorities close to Rutland Water; however, the permitting system enables visitor numbers to the SPA/Ramsar to be controlled such that significant effects from recreation pressure are not likely.

5.77 There will be no adverse effects on the integrity of Rutland Water SPA and Ramsar site, as a result of recreation pressure, either alone or in combination with other plans or projects.

Upper Nene Valley Gravel Pits SPA and Ramsar site

5.78 The Upper Nene Valley Gravel Pits SPA and Ramsar site lies within the Plan area and therefore receives visitors from the Local Plan Part 2 area.

5.79 The Standard Data Form for the SPA identifies outdoor sports and leisure activities or recreational activities as a threat / pressure. The Ramsar Information Sheet states that access by people and dogs both on and off public rights of way is a significant cause of disturbance in some areas and that the site is also subject to a variety of recreational activities including fishing and water sports. The Site Improvement Plan confirms the existence of a potential threat of recreational disturbance (particularly from walkers and dog owners) to wintering birds by reducing the time available for feeding and increasing energy expenditure when avoiding those sources of disturbance. Research shows that disturbance from human recreational activities in wetlands can cause problems for wildfowl²⁵. Detailed local studies of the effects of visitor behaviour on bird behaviour and numbers have shown that people and dogs can disturb the SPA's birds as they feed and roost²⁶.

5.80 A 2014 visitor access study for the SPA²⁷ found that visitor rates correlate with proximity to residential areas and that they decline rapidly with distance such that a relatively small proportion of people visit from distances beyond 3km of the surveyed access points. Approximately half of visitors surveyed were walking dogs, almost all (98%) were on a short

²² Michael John Pearson (1996) The Management of a National Environmental Problem, "Toxic Cyanobacteria"

²³ <https://www.lwrt.org.uk/nature-reserves/rutland-water/>

²⁴ <https://anglianwaterparks.co.uk/rutland-water>

²⁵ For example, see Kirby J, Davidson N, Giles N, Myrfyn O and Spray C. 2004. Waterbirds and Wetland Recreation Handbook – a Review of Issues and Management Practice. Slimbridge: The Wildfowl and Wetlands Trust.

²⁶ Brayshaw RS. 2010. Survey work to support the Appropriate Assessment for the West Northamptonshire Joint Core Strategy, Element 2: Field surveys (recreational, disturbance and bird behaviour). Report to the West Northamptonshire Joint Planning Unit.

²⁷ Liley, D., Floyd, L., Cruickshanks, K. & Fearnley, H. (2014). Visitor Access Study of the Upper Nene Valley Gravel Pits SPA. Footprint Ecology. Unpublished report for the NIA partnership. NBC intends to publish this as part of its Local Plan evidence base later in 2017.

visit from home, most (77%) arrived by car, and most were frequent visitors (60% visited at least once per week).

5.81 The visitor access study findings are reported in the Upper Nene Valley Gravel Pits SPD, which states that “recreational disturbance is the most significant threat to the Upper Nene Valley Gravel Pits SPA”. The SPD further notes that demand for access and recreational activities in the Nene Valley is increasing along with disturbance to the birds for which the SPA is designated. It goes on to state that since disturbance effects are cumulative, any net increase in the number of residential units near the SPA has the potential, in the absence of mitigation, to increase the significance of the effect by increasing the number of visits to the European site.

5.82 In line with the findings of the visitor access study above and the 3km consultation zone defined by the SPD for all applications involving a net gain in residential units, it is judged that all residential development within 3km of Upper Nene Valley Gravel Pits SPA and Ramsar site would be likely to contribute to an in-combination recreational disturbance effect on the European site. The allocated residential sites within 3km of the Upper Nene Valley Gravel Pits SPA and Ramsar sites are (**Figure 5.4**):

- *LAA0174 Ransome Road Gateway* - 24 homes, c.2.6km away;
- *LAA0193 Former Lings Upper School, Birds Hill Walk* – 60 homes, c.2.1km away;
- *LAA0204 The Farm, Hardingstone* – 55 homes, c.2.2km away;
- *LAA0335 Chronicle and Echo North* - 42 homes, c.2.4km away;
- *LAA0685 Adj. 12 Pennycress Road* - 12 homes, c.2.3km away;
- *LAA0903 Hawkins Shoe Factory, Overstone Road* - 105 homes, c.2.3km away;
- *LAA0932: Southbridge Site 1* – 44 homes, c.2.3km away;
- *LAA0933: Southbridge Site 2* – 28 homes, c.2.3km away;
- *LAA1010 Land at St Peter’s Way / Court Road / Freeschool Street* - 5 homes, c.3km away;
- *LAA1014 University of Northampton, Avenue Campus* - 170 homes, c.3km away;
- *LAA1022 Belgrave House* - 122 homes, c.2.6km away;
- *LAA1049 Land off Arbour Court* - 6 homes, c.2.9km away;

- *LAA1098: The Green, Great Houghton* – c.800 homes, c.1.2km away;
- *LAA1107: Former Abington Mill Farm, land off Rushmere Road* - 125 homes, c.150m away;
- *LAA1113 Greyfriars* - 400 homes, c.2.5km away;
- *LAA1124 41-43 Derngate Road* - 31 homes, c.2.3km away;
- *LAA1127 32 Connaught Street* - 6 homes, c.2.7km away;
- *LAA1134 St John’s Railway Embankment* - 12 homes, c.2.3km away; and
- *LAA1139: Ransome Road* - 500 homes, c.1.9km away.

5.83 These sites are allocated for development under the following policy, which would therefore have a potentially significant effect due to recreation pressure:

- *Policy 13: Residential and other residential led allocation*
Allocates up to 2,547 new homes on 19 sites within 3km of the SPA/Ramsar.

5.84 Policy 41: The Green, Great Houghton, Policy 40: Greyfriars, and Policy 46: Abington Mill Farm set specific principles for development at sites LAA1098, LAA1113, and LAA1107, respectively, but the number of homes has been assessed in relation to Policy 13.

5.85 At LAA1098, however, the large scale of development and its proximity to the SPA/Ramsar mean that the design principles set out in Policy 41 also influence how easy or attractive it will be for residents to visit the SPA/Ramsar versus other greenspaces, and the provision of space for recreation within the site itself. Policy 41 encourages connections to the nearby Brackmills Country Park, which could help to prevent a significant increase in visitors at the SPA/Ramsar, and requires that Suitable Alternative Natural Greenspace (SANG) is incorporated into site LAA1098. The SANG must be designed such that (potentially functionally linked) habitats are protected or enhanced. Policy 41 also states that “*If any part of the SANG is proposed off-site, the SANG will need to be adjoining the site*”.

5.86 In addition to the allocated sites, the following policies permit an increase in the number of homes in locations other than allocated sites:

- *Policy 9: Regeneration opportunities in the Central Area*
Promotes mixed use (including residential) development in the town centre and central area;
- *Policy 12: Development of main town centre uses*
Permits regeneration of sites outside the central area;

■ ***Policy 15: Delivering houses in multiple occupation***

Enables an increase in the number of households within a house;

■ ***Policy 17: Safeguarding existing employment sites***

Permits changes of use from employment to non-employment uses; and

■ ***Policy 21: Residential development on upper floors***

Allows changes of use above shops, to residential.

5.87 *Policy 4 Amenity and Layout* also requires that new developments ensure “adequate access to both high quality recreational and semi-natural green spaces for all residents”, which could in theory encourage development close to existing sites such as the SPA.

5.88 The recreation pressure effect of the Local Plan Part 2 would act in combination with any recreation pressure from other residential development within 3km of the European site. The Upper Nene Valley Gravel Pits SPA and Ramsar site is a composite site made up of several sites along the River Nene valley. Only the Northampton Washlands portion of the SPA/Ramsar is within 3km of the Plan area; therefore only development plans with the potential to contribute to recreation pressure at that part of the site could have in-combination effects with the Local Plan Part 2. These are:

- West Northamptonshire Joint Core Strategy: the Northampton South of Brackmills SUE allocates 1,300 homes c.650m to the west of LAA1098 and c.2.2km from the SPA/Ramsar, plus any unallocated residential development permitted by this plan; and
- South Northamptonshire Local Plan: if there is development within 3km of the SPA / Ramsar.

5.89 In particular, the ‘Northampton South of Brackmills SUE’ allocated in the JCS in combination with LAA1098 will result in a large volume of residential development at two sites that are close to each other and will therefore put pressure on the same local greenspaces for recreation.

5.90 The proposed approach to mitigating recreational pressure at Northampton Washlands (Unit 1 of the SPA/Ramsar) and the wording of policies in the Local Plan Part 2 have been discussed and agreed with Natural England; see Appendix E.

5.91 To mitigate potential effects on the Upper Nene Valley Gravel Pits SPA and Ramsar site, due to recreation pressure, the Local Plan Part 2 contains the following:

- ***Policy 30: Upper Nene Valley Gravel Pits Special Protection Area***

“Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.

Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the UNVGP SPA Supplementary Planning Document. Applications comprising a new gain in residential units within 3km of the Upper Nene Valley Gravel Pits SPA will, in combination, have an adverse effect on the integrity of the SPA if not mitigated.

The Local Planning Authority has adopted a mitigation strategy for Unit 1 of the Upper Nene Valley Gravel Pits SPA which must be referred to when preparing an application that is located within 3km of Unit 1 of the SPA. Residential development will be required to pay a Strategic Access Management and Monitoring (SAMM) contribution and / or provide bespoke mitigation such as a Suitable Alternative Natural Greenspace (SANG) in order to mitigate recreational impact.”

5.92 The Upper Nene Valley Gravel Pits Special Protection Area SPD (2015) sets out the type of mitigation options that would be appropriate to mitigate the disturbance of birds at the SPA, based on a study by Footprint Ecology. These include alternative natural greenspace, habitat management, enhancement of other waterside sites, management of visitor flows / access, education and enforcement.

5.93 The recreation mitigation strategy, which forms an addendum to the SPD²⁸ requires residential development within 3km of the SPA/Ramsar to contribute to funds for Strategic Access, Management and Monitoring (SAMM). The strategy also states that: “Developments of 10 dwellings or more will be required to pay the SAMM and / or provide other suitable mitigation and the advice of Natural England should be sought at the outset of the planning process.” And “Other large scale developments may need project level HRAs and/or bespoke mitigation such as SANGs. Proposed schemes of 10+ dwellings are required to liaise with Natural England at the outset to discuss SPA mitigation.” This is the case for site LAA1098, where the mitigation agreed is set out in Policy 41.

²⁸ <https://www.northampton.gov.uk/downloads/file/12918/unvgp-spa-spd-addendum-mitigation-strategy-march-2022>

5.94 The recreation mitigation strategy has been developed in conjunction with South Northamptonshire District, the other local authority whose Local Plan would impact upon the Northampton Washlands part of the SPA/Ramsar. A small corner of Wellingborough borough also lies within 2.5km of Northampton Washlands, although there are no housing allocations or settlements within 3km of Northampton Washland. Any residential development in Wellingborough within 3km of the SPA/Ramsar is required to contribute to mitigation in line with the recreation strategy²⁹ agreed by Wellingborough and East Northamptonshire councils.

5.95 South Northamptonshire Local Plan Draft Submission (Regulation 19) version was completed in September 2018 and contains the following, which aligns with the overarching Policy BN4 Upper Nene Valley Gravel Pits Special Protection Area, within the Joint Core Strategy:

- South Northamptonshire Local Plan Draft Submission Policy NE1: Upper Nene Gravel Pits Special Protection Area

"New development will need to demonstrate that the impact of any increased recreational activity (indirect or direct) on the Special Protection Area will not have a detrimental impact. Any development that will lead to an increase in recreational activity on the Special Protection Area will be required to include necessary mitigation including providing or contributing towards a combination of the following measures:

- a) development of and implementation of habitat and access management plans within the SPA;
- b) improvement of existing greenspace and recreational routes;
- c) provision of alternative natural greenspace and recreational routes; and
- d) monitoring of the impacts of new development on European designated sites to inform the necessary mitigation requirements and future refinement of any mitigation measures."

And:

"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."

5.96 Further mitigation is provided in the Local Plan Part 2 by the following policies:

- *Policy 27: Sustaining and enhancing existing, and supporting the creation of, Northampton's green infrastructure*

Requires all major housing and commercial developments to deliver and/or contribute to a net gain in green and blue infrastructure, which could divert some recreation trips away from the SPA/Ramsar;

- *Policy 28: Providing open spaces*

Sets standards for greenspace provision in major developments, including 1.57ha of natural and semi-natural green space per 1,000 population, within a 720m walk. States that SANG can contribute to open space provision to draw residents away from designated sites. This provides green infrastructure that could divert some recreation trips away from the SPA/Ramsar; and

- *Policy 29: Supporting and enhancing biodiversity states that :*

"The Council will require all development proposals to provide a net gain in biodiversity through the creation or enhancement of habitats by: i. Incorporating and enhancing existing biodiversity features on and/or off site; ii. Consolidating, developing and enhancing functionality of ecological networks including those beyond the Local Plan's boundary; and iii. Managing, monitoring and maintaining biodiversity within a development.

B. Proposals should enhance natural capital and be designed around the existing components of the ecological network including sites of national or international importance, sites of local importance and other biodiversity assets. ."

- *Policy 41: The Green, Great Houghton (LAA1098)* requires that:

"Winter surveys are undertaken to identify whether the site is used by over-wintering Golden Plover / Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat."

"Development must adhere to Policy 30 of this Plan, in particular with reference to recreational disturbance and

²⁹ http://www.wellingborough.gov.uk/downloads/file/7562/mitigation_strategy

functionally linked land associated with the Upper Nene Valley Gravel Pits Special Protection Area.”

and

"Proposals must be informed by a masterplan for the whole allocation which will be expected to:... e. Provide a SANG within the area identified in Figure 20 [northern part of site] which provides the following: i. Protection, enhancement and / or creation of habitats in line with other policies of this plan. ii. Accessibility for residents' recreation including an off-lead dog walking area. iii. A circular walking route around the SANG and eastern development area. iv. A clear separation between the developed site and the village of Great Houghton in order to protect its setting and the heritage assets of the village. v. Formal and informal open space. vi. A SANG car park, vii. If any part of the SANG is proposed off-site, the SANG will need to be adjoining the site."

5.97 It is therefore considered that development management policies within the Local Plan Part 2 and the mitigation strategy that forms an appendix to the Upper Nene Valley Gravel Pits SPD provide sufficient mitigation to prevent residential development from having a significant effect on the SPA/Ramsar, either alone or in combination with other plans and projects.

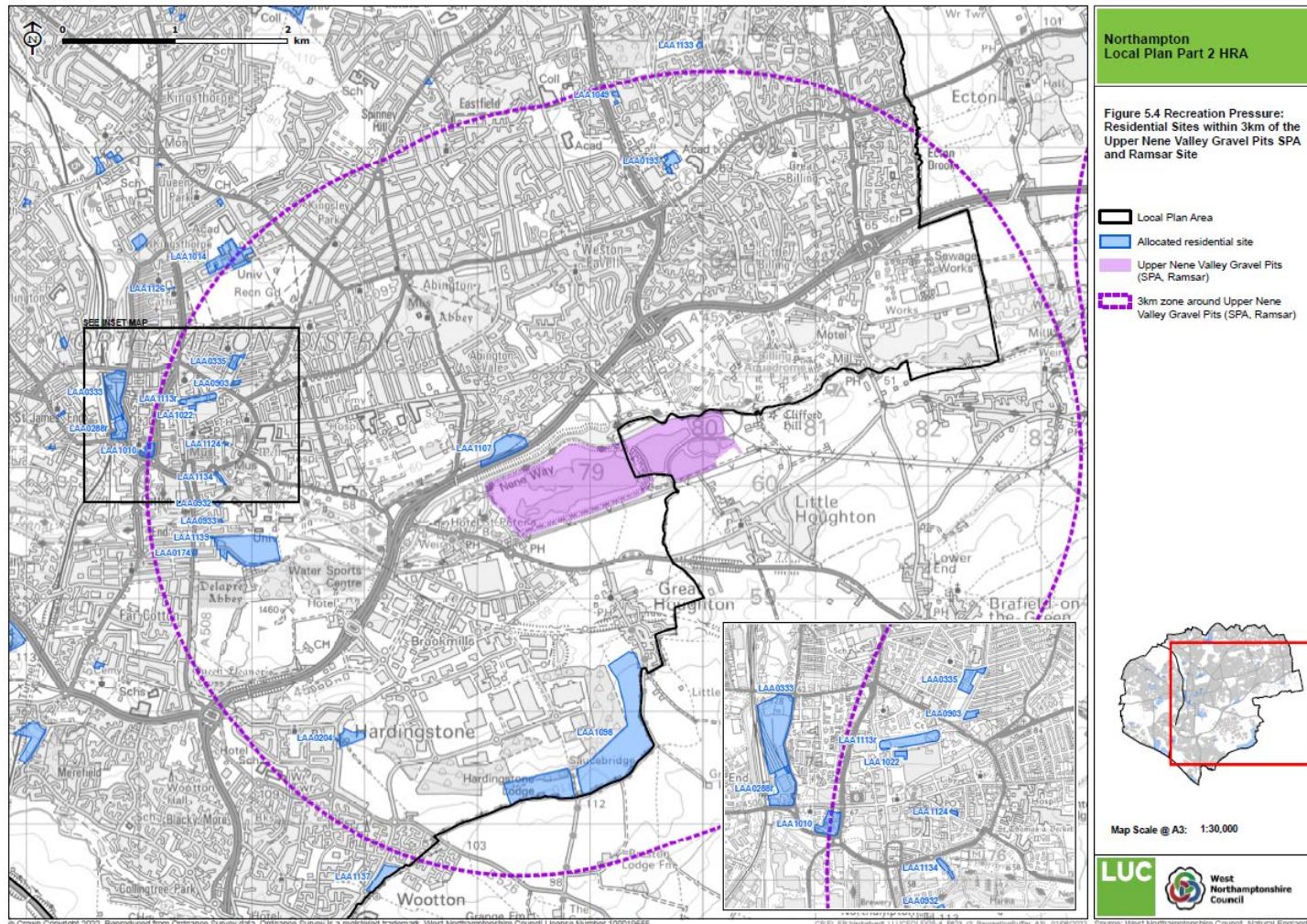
5.98 With mitigation required by policies and described in supporting text within the Local Plan Part 2 (which includes the mitigation strategy appended to the SPD), and in combination with policies set out in the Joint Core Strategy and in the Draft Submission South Northamptonshire Local Plan, there will be no adverse effects on the integrity of Upper Nene Valley Gravel Pits SPA and Ramsar site as a result of recreation pressure, either alone or in combination with other plans or projects.

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Figure 5.4: Recreation pressure: residential sites within 3km of the Upper Nene Valley Gravel Pits SPA and Ramsar site



Pet predation

5.99 Pet predation, notably hunting by domestic cats from nearby residential developments, can be a concern where development is proposed close to a European site, particularly where the qualifying species is bird or mammal. Evidence shows that pet cats can roam up to 1.5 km at night^{30 31}.

5.100 As well as pets, research has shown that habitats close to urban areas can have higher densities of mammalian predators such as foxes³² and that there is an increase in the numbers of crows and magpies on sites with greater human activity³³.

Rutland Water SPA and Ramsar site

5.101 Rutland Water is located 41km outside Local Plan Part 2 area and therefore will not be subject to any potential pet predation arising from the Local Plan Part 2 policies or sites.

5.102 There will be no adverse effects on the integrity of Rutland Water SPA and Ramsar site, as a result of pet predation either alone or in combination with other plans or projects.

Upper Nene Valley Gravel Pits SPA and Ramsar site

5.103 The Standard Data Form for this SPA site highlights the effects of 'other urbanisation' as a main threat and pressure that is impacting the site. The Information Sheet for the Ramsar site also highlights 'Unspecified development: urban use' as having an adverse effect on the site stating that "*activities connected with ongoing urban development cause significant disturbance to wintering birds if unmanaged*".

5.104 Although pet predation is not specifically mentioned, it is assumed on a precautionary basis that pet predation could result in likely significant effects when residential site allocations are located within 1.5 km of a European site.

5.105 Two sites are allocated for residential development within 1.5km of the SPA and Ramsar site (**Figure 5.5**):

- *LAA1107 Former Abington Mills Farm, land off Rushmere Road*
125 new homes, c.150m away. Policy 46 sets out the development principles at the site; and

- *LAA1098 The Green, Great Houghton*
800 new homes, c.1.2km away. Policy 41 sets out the development principles at the site.

5.106 However, when physical barriers are taken into account it is considered that the potential effects of site LAA1107 will be significantly reduced due to the barriers formed by the River Nene and the A45 (a wide dual carriageway road). It is concluded therefore that this site will not result in significant effects on the Upper Nene Valley SPA and Ramsar site as a result of pet predation.

5.107 At site LAA1098, it is only the northernmost part of the site that is within 1.5km of the SPA. Policy 41 safeguards the northern part of the site as an ecological buffer; therefore none of the residential development will lie within 1.5km of the SPA / Ramsar. The area earmarked for SANG is potentially on FLL used by Golden Plover / Lapwing, in which case pet predation (as well as recreation pressure from this site) could affect birds from the SPA / Ramsar. Policy 41 therefore requires that:

"Winter surveys are undertaken to identify whether the site is used by over-wintering Golden Plover / Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat."

and

"Proposals must be informed by a masterplan for the whole allocation which will be expected to...e. Provide a SANG within the area identified in Figure 20 [northern part of sites] which provides the following: i. Protection, enhancement and / or creation of habitats in line with other policies of this plan."

5.108 This requirement has been agreed with Natural England (see Appendix E) and is considered sufficient to prevent significant effects associated with the development of this site from pet predation.

5.109 Other policies (or plans) that permit development outside of allocated sites could also result in development within 1.5km of the SPA/Ramsar.

5.110 The following policies safeguard the SPA/Ramsar from pet predation:

³⁰ Predation of wildlife by domestic cats in Great Britain. Woods, M. McDonald, R.A. and Harris, S. 2003, Mammal Review, Vol. 33, pp. 174-188.

³¹ Avian assemblage structure and domestic cat densities in urban environments. Sims, V., et al., et al. 2008, Diversity and Distributions, Vol. 14, pp. 387-399.

³² Taylor, E. Predation risk in woodlark *Lullula arborea* habitat: the influence of recreational disturbance, predator abundance, nest site characteristics and temporal factors. s.l.: School of Biological Sciences, UEA, 2002.

³³ Corvid responses to human settlements and campgrounds: causes, consequences and challenges for conservation. Marzluff, J.M. and Netherlin, E. 2006, Biological Conservation, Vol. 130, pp. 301-314.

■ *Policy 29B: Nature conservation states that:*

"A. The Council requires development to protect, maintain and enhance biodiversity and geodiversity. All proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment. If harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for, planning permission will be refused.

B. Proposals should have regard to principles set out in the Northamptonshire Biodiversity SPD or successor document and where necessary undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards to inform development."

5.111 This provides specific protection for the SPA/Ramsar.

■ *Policy 30: Upper Nene Valley Gravel Pits Special Protection Area states that:*

"Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.

Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the UNVGP SPA Supplementary Planning Document. Applications comprising a new gain in residential units within 3km of the Upper Nene Valley Gravel Pits SPA will, in combination, have an adverse effect on the integrity of the SPA if not mitigated."

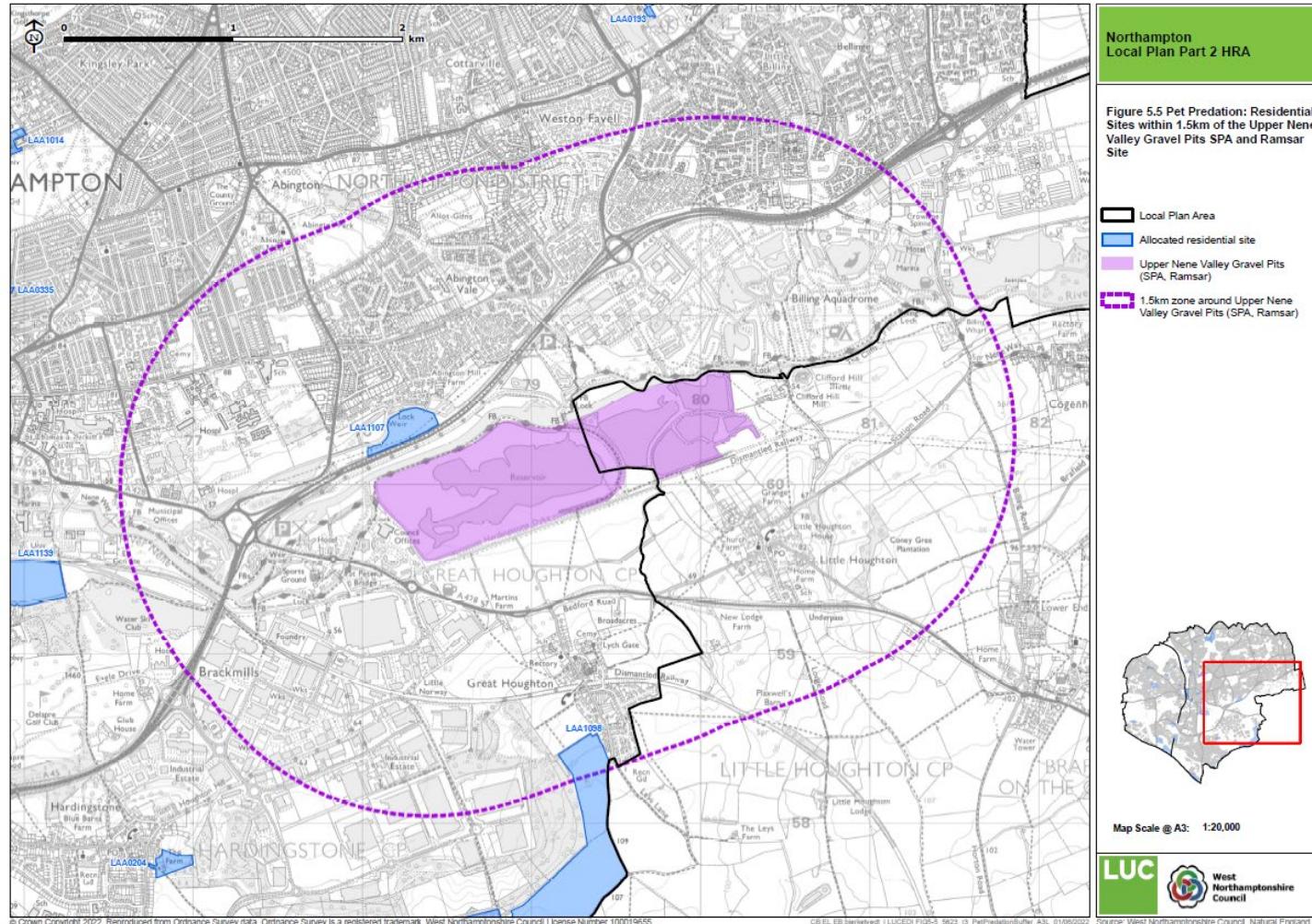
5.112 In addition, any unallocated development proposals coming forward (e.g. Policies 9, 12, 18 or 19) within 1.5km of the Upper Nene Valley Gravel Pits SPA and Ramsar site would require project-level Appropriate Assessment, with the objective of ensuring that such development proposals do not give rise to adverse effects on integrity either alone or in-combination with other plans or projects.

5.113 With mitigation required by policies within the Local Plan Part 2, there will be no adverse effects on the integrity of Upper Nene Valley Gravel Pits SPA and Ramsar site, as a result of pet predation either alone or in combination with other plans or projects.

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Figure 5.5: Pet predation: residential sites within 1.5km of the Upper Nene Valley Gravel Pits SPA and Ramsar site



Direct mortality

5.114 Policy 5 states that:

"All development proposals should:...

Actively promote energy efficiency and use of renewable energy sources where there is opportunity to do so"

5.115 The blades of wind turbines, if installed, could strike birds, causing direct mortality.

Rutland Water SPA and Ramsar site

5.116 Although it is possible that birds visiting Rutland Water could be killed by wind turbines in Northampton, the SPA/Ramsar is 41km away and a significant effect is very unlikely.

5.117 There will be no adverse effects on the integrity of Rutland Water SPA and Ramsar site, as a result of direct mortality from wind turbines either alone or in combination with other plans or projects.

Upper Nene Valley Gravel Pits SPA and Ramsar site

5.118 It is possible that birds from the SPA/Ramsar could be affected by direct mortality from new wind turbines, it is considered that the protection provided by other policies within the Local Plan Part 2 (Policies 29 and 30) is sufficient to prevent significant effects.

5.119 There will be no adverse effects on the integrity of Upper Nene Valley Gravel Pits SPA and Ramsar site, as a result of direct mortality from wind turbines either alone or in combination with other plans or projects.

Changes to water supply and water level management

5.120 An increase in demand for water abstraction resulting from the growth proposed in the Local Plan Part 2 could result in changes to water levels or flows at hydrologically connected European sites. Depending on the qualifying features and particular vulnerabilities of the European sites, this can result in likely significant effects on site integrity.

Rutland Water SPA and Ramsar site

5.121 The potential exists for effects on Rutland Water as it is a primary source of urban water supply for Northamptonshire³⁴ and therefore the population increases associated with development within the Local Plan Part 2 area are likely to affect water levels at the site. Human induced changes in hydrology are listed as a key vulnerability for this European site.

5.122 The assessment of effects in relation to water supply and water level management has been informed by studies undertaken as part of the West Northamptonshire Joint Core Strategy work. The West Northamptonshire Water Cycle Strategy was published in 2011, alongside the Joint Core Strategy. It concluded that:

"...water resource availability should not be considered a constraint to the Core Strategy Implementation, subject to the implementation of the Code for Sustainable Homes Standards through Building Regulations or through Local Policy'. It also concluded that 'Anglian water services strategic infrastructure and resource strategic planning within the Ruthamford Water Resource Zone will support the proposed growth within the study area until 2035".

5.123 However, the Water Cycle Study was published in 2011 and is therefore out of date. Notable changes since its publication include the fact that the Code for Sustainable Homes has been withdrawn and that the Anglian Water supply area has been classified by the Environment Agency as an area of 'serious water stress', both currently and under future climate change and abstraction demand scenarios³⁵.

5.124 More recent evidence is available from Anglian Water's 'Water Resources Management Plan 2019'³⁶ (WRMP), which sets out a 25-year plan to maintain the water supply demand balance in the supply region and measures to minimise the environmental impact of abstractions.

5.125 The WRMP plans for the period from 2020 to 2045 and therefore extends beyond the Local Plan Part 2 period, but it predicts that at the end of the WRMP period (2020-2045), without mitigation, North Ruthamford would have a water deficit (demand exceeding supply) of 37.4Ml/day, due to population growth and climate change. The WRMP sets out the strategy for mitigating these effects and ensuring that supply exceeds demand without causing environmental harm. In Ruthamford North, this will be principally achieved through

³⁴ Anglian Water, Water Resources Management Plan 2015: https://www.anglianwater.co.uk/_assets/media/WRMP_2015.pdf
³⁵ Environment Agency and Natural Resources Wales, 2013, Water stressed areas – final classification.

³⁶ Anglian Water 'Water Resources Management Plan 2019' <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>

transfer between resource zones. The recent HRA³⁷ of the draft 2019 WRMP concludes that the works required to enable the WRMP would not result in likely significant effects on either Rutland Water SPA and Ramsar or the Upper Nene Valley Gravel Pits SPA and Ramsar.

5.126 Within the WRMP, Anglian Water state that they work closely with the Environment Agency and Natural England to ensure that their abstractions do not have a detrimental impact on the environment, and that many of their abstraction licences include conditions requiring them to monitor environmental impact which are reported on annually and if any deterioration is identified then they remain committed to addressing the issue. Anglian Water is also subject to the Environment Agency's licensing regime which regulates the amount of water that can be abstracted in order to protect the environment. These controls are set out in The Nene Catchment Abstraction Management Strategy and they add another level of protection regarding the amount of water taken from the environment.

5.127 The WRMP takes into account the development targets of authorities within each resource zone, and therefore plans for the growth targets set for Northampton (within the Joint Core Strategy). As described in **Chapter 2**, homes allocated within the Local Plan Part 2 are in addition to those allocated in the Joint Core Strategy.

5.128 Local Plan Part 2 policies that result in an increase in the number of households are:

- **Policy 13: Residential and other residential -led allocation**
Defines the overall supply of new housing in the Local Plan Part 2, at allocated residential sites;
- **Policy 9: Regeneration opportunities in the Central Area**
Promotes mixed use (including residential) development in the town centre and central area;
- **Policy 12: Development of main town centre uses**
Permits regeneration of sites outside the central area;
- **Policy 15: Delivering houses in multiple occupation**
Enables an increase in the number of households within a house;
- **Policy 17: Safeguarding existing employment sites**
Permits changes of use from employment to non-employment uses; and
- **Policy 21: Residential development on upper floors**
Allows changes of use above shops, to residential.

5.129 Large non-residential development could also contribute to an increase in water demand; for example from health facilities (Policy 6), or employment (Policy 17A)

5.130 Some mitigation for these effects is provided in policy wording within the Local Part 2, as follows:

- **Policy 5: Carbon reduction, community energy networks, sustainable design and construction, and water use**
Requires new residential developments to achieve a high water efficiency standard of 110l per person per day

5.131 To ensure that the Local Plan Part 2's additional housing supply will not have an adverse effect on water demand (i.e. in combination with the Joint Core Strategy and other plans), Anglian Water has reviewed the Local Plan Part 2 allocated sites (based on the Local Plan site options consultation, 2017) and confirmed³⁸ that no significant water supply issues are anticipated over the plan period.

5.132 Anglian Water later raised a concern in their response³⁹ to consultation on the Proposed Submission Local Plan Part 2 (first round Regulation 19 consultation) that policy wording should contain a commitment to water efficiency standards. This has been incorporated into Policy 5; no other concerns were raised.

5.133 The sites allocated in the Local Plan Part 2 (Main Modifications) is slightly different to the list proposed in the first round of Regulation 19 consultation, with four new development sites but the overall quantum of development is similar to that which Anglian Water had previously been consulted on (4,538 in the first round consultation; 3,804 in the second round; now 3,838).

5.134 With the requirement for water efficiency in place, which addresses the concerns raised by Anglian Water in response to the first round of Regulation 19 consultation, it is not considered that there will be significant effects on water supply.

5.135 There will be no adverse effects on the integrity of Rutland Water 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.

Upper Nene Valley Gravel Pits SPA and Ramsar site

5.136 The potential exists for likely significant effects because the River Nene, which supplies water to the Upper Nene Valley Gravel Pits, is also an important source of water to fill both Pitsford and Rutland Water reservoirs for public

³⁷ Anglian Water – Water Resources Management Plan 2019, Habitats Regulations Assessment - Task I: Screening and Task II: Appropriate Assessment (March 2018).

³⁸ Personal communication with N Banks, Northampton Borough Council (now West Northamptonshire Council), 7 January 2019

³⁹ <https://www.northampton.gov.uk/downloads/file/11401/ps1-053-anglian-water-001-reddacted>

water supply⁴⁰. Significant strategic abstraction occurs at Duston Mill, upstream of the Upper Nene Valley Gravel Pits, in addition to other abstraction points⁴¹. As previously described, Rutland Water is the primary water source for Northampton but an increasing demand for water could have a knock-on effect on the River Nene and subsequently the Upper Nene Valley Gravel Pits.

5.137 As with Rutland Water, the 2019 WRMP provides mitigation to enable supply within the Ruthamford North resource zone to exceed demand, without environmental harm.

5.138 Policies resulting in an increase in numbers of households or large non-residential development (as above) could increase the demand for water; however mitigation is provided by the following policy, in line with Anglian Water's response to the first round of Regulation 19 consultation on the Local Plan Part 2:

- *Policy 5: Carbon reduction, community energy networks, sustainable design and construction, and water use*
Requires new residential developments to achieve a high water-efficiency standard of 110l per person per day. Water reuse and recycling, rainwater and stormwater harvesting, and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply.

5.139 The following policy also provides protection for the SPA/Ramsar from changes in water supply and water level management:

- *Policy 30: Upper Nene Valley Gravel Pits Special Protection Area* states that:

"Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.

Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the UNVGP SPA Supplementary Planning Document. Applications comprising a new gain in residential units within 3km of the Upper Nene Valley

Gravel Pits SPA will, in combination, have an adverse effect on the integrity of the SPA if not mitigated." and

"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. "

5.140 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.

⁴⁰ 2011, West Northamptonshire water cycle study: Pre-submission Joint Core Strategy final detailed WCS report.

⁴¹ Environment Agency, 2013, The Nene Catchment Abstraction Management Strategy.

Changes to water quality

5.141 An increase in demand for wastewater treatment resulting from the growth proposed in the Local Plan Part 2 could result in a decrease in water quality as a result of increased amounts of treated sewage being discharged to hydrologically linked watercourses or increased amounts of contaminated water running off roads and other urban surfaces. Depending on the qualifying features and particular vulnerabilities of the European sites, there could be a likely significant effect on site integrity.

Rutland Water SPA and Ramsar site

5.142 Due to the distance between the plan area and Rutland Water SPA and Ramsar site and the absence of hydrological connections with wastewater discharge points from Northampton's Wastewater Treatment Works (WwTWs), it is highly unlikely that surface run-off, foul sewage or other potential water pollution from increased development in Northampton will affect this European site.

5.143 There will be no adverse effects on the integrity of Rutland Water SPA and Ramsar site, as a result of changes to water quality either alone or in combination with other plans or projects.

Upper Nene Valley Gravel Pits SPA and Ramsar site

5.144 The River Nene flows west to east through Northampton and therefore flows through the city before passing the SPA/Ramsar.

5.145 Population growth in Northampton has the capacity to have an adverse effect on the water quality of this site relating to both increased amounts of treated sewage entering the River Nene or the expansion of the built-up area resulting in increased amounts of polluted water running off roads and other urban surfaces.

5.146 The Upper Nene Valley Gravel Pits Special Protection Area SPD requires that applications for discharge to surface water or the ground, within 10km of the SPA/Ramsar, consult with Natural England.

5.147 Wastewater from Northampton is discharged into the River Nene at Great Billing wastewater treatment works (WwTW) which serves Northampton⁴². It is located just to the east of Northampton next to the River Nene, between two sections of the SPA and Ramsar site, the flood storage reservoir near Northampton and Grendon lakes, downstream. It discharges into the Nene at this point meaning areas of the

SPA and Ramsar site that are downstream could be adversely affected by increases in discharge.

5.148 The West Northamptonshire Water Cycle Study stated that:

“the current WFD status has been assessed for the waterbody that the WwTW that serves Northampton discharges into. The River Nene is currently failing to meet good ecological status, because the waterbody does not achieve good physiochemical status”

5.149 The study reported that Great Billing WwTW had infrastructure capacity for development forecast in the period 2010-2015, provided that capital maintenance improvements planned and funded in AMP5 were delivered. However, it was stated that in the longer term a new consent will be required and additional infrastructure will be needed to be funded and delivered through Anglian Water's business planning process, although no constraints to providing this infrastructure were identified. The study also concluded that the existing water quality consent will need to be tightened and monitored to ensure no deterioration but that this is achievable within the limits of conventional technology and should not be a constraint to development in Northampton.

5.150 Anglian Water have since reviewed the Local Plan Part 2 allocated sites and confirmed⁴³ that no significant water treatment issues are anticipated (subject to the inclusion of water efficiency standards being incorporated into Policy 5, which have been incorporated).

5.151 In addition to wastewater discharges, the Local Plan Part 2 could also have an adverse effect on the Upper Nene Valley Gravel Pits SPA and Ramsar site due to an increase in polluted surface water run-off relating to an increase in hard standing area from growth in Northampton (and potentially in combination with the West Northamptonshire Joint Core Strategy SUEs and development in South Northamptonshire).

5.152 Policies that permit new development, changes in use or occupation could alter wastewater treatment loads and therefore affect the water quality of the River Nene, as could development sites with surface water drainage pathways to the River Nene. The following policies therefore have the potential to alter water quality at the Upper Nene Valley Gravel Pits SPA and Ramsar site:

- *Policy 6: Health and wellbeing*
Permits new health facilities;

⁴² Halcrow, 2011, West Northamptonshire Water Cycle Study for the Pre-Submission Joint Core Strategy, Detailed WCS Final Report.

⁴³ Personal communication with N Banks, Northampton Borough Council (now West Northamptonshire Council), 7 January 2019.

- **Policy 8: Supporting Northampton town centre**
Permits (small-scale) development in the town centre;
- **Policy 9: Regeneration opportunities in the Central Area**
Encourages regeneration (housing & mixed use) within town centre and central area, particularly at named sites (some of which have site-specific policies);
- **Policy 12: Development of main town centre uses**
Permits regeneration of sites outside the central area;
- **Policy 13: Residential and other residential -led allocation**
Allocates 3,838 new homes (in addition to those required by the Joint Core Strategy) on 51 sites;
- **Policy 15: Delivering houses in multiple occupation**
Allows increases in the numbers of households;
- **Policy 17: Safeguarding existing employment sites**
Permits changes of use to non-employment uses;
- **Policy 18: Supporting new employment developments and schemes within and outside safeguarded sites**
Permits development at sites where employment activities would not cause harm to adjoining land uses and occupiers;
- **Policy 21: Residential development on upper floors**
Allows changes of use to residential; and
- **Policy 17A: Employment allocations**
Allocates the sites and defines the quantum of employment development.

5.153 Safeguarding is provided by the following:

- **Policy 7: Flood risk and water management**
Supports proposals that comply with standards for surface water (as set by the Lead Local Flood Authority and Anglian Water). All major developments must incorporate sustainable drainage systems.
- **Policy 30: Upper Nene Valley Gravel Pits Special Protection Area** states that:

"Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.

Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding

proposals that could affect the SPA. Applicants should also have regard to the UNVGP SPA Supplementary Planning Document. Applications comprising a new gain in residential units within 3km of the Upper Nene Valley Gravel Pits SPA will, in combination, have an adverse effect on the integrity of the SPA if not mitigated." and

5.154 "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. General protection for the SPA/Ramsar is also embedded into the Local Plan Part 2, in Policies 29A and 29B.

5.155 There are also a number of policies in the West Northamptonshire Joint Core Strategy that provide additional safeguards for in-combination effects:

- **Policy BN9 Planning for pollution control**
States that "Proposals for new development which are likely to cause pollution or likely to result in exposure to sources of pollution or risks to safety will need to demonstrate that they provide opportunities to minimise and where possible reduce pollution issue that are a barrier to achieving sustainable development and healthy communities." In regards to water quality this is through "Protecting and improving surface and groundwater water quality".
- **Policy BN7a Water supply, quality and wastewater infrastructure**
Includes the requirement for adequate wastewater treatment capacity to address environmental constraints, as well as the use of sustainable drainage systems, where practicable, to improve water quality, reduce flood risk and provide environmental and adaptation benefits.
- **Policy BN4 Upper Nene Valley Gravel Pits Special Protection Area**
Sets out the need for new developments to demonstrate, through the development management process, that there will be no significant adverse effects on the integrity of the Upper Nene Valley SPA / Ramsar site due to (among others things) "water runoff, water abstraction or discharges from the foul drainage system".
- **Policy BN8 The River Nene strategic river corridor**
Proposals for new development must demonstrate an understanding of the importance of the River Nene for biodiversity within and beyond the plan area.
- **Policy S10 Sustainable development principles**
Sets out a requirement to maximise water efficiency and sustainable drainage and minimise pollution from run-off.

5.156 Further protection safeguards are provided by policies and procedures set out by Anglian Water and the Environment Agency. Water treatment and recycling in Northampton is carried out by Anglian Water and the quality of the water that is discharged to water courses must pass strict standards set by law and enforced by the Environment Agency. The Environment Agency measures the performance of all the water companies in England annually. The Environment Agency's 2016 Environmental Performance Assessment Report found that in 2015 Anglian Water achieved 99% compliance with their discharge licences and permits (all water companies have licences and permits which control the level of impact they are allowed to have on the environment). The Environment Agency also licence and control all discharges and abstractions and have responsibilities to ensure 'no deterioration' of water quality under the Water Framework Directive, which adds an extra layer of protection.

5.157 With safeguards provided by policies within the Local Plan Part 2 and Joint Core Strategy, 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 quality either alone or in combination with other plans or projects.

Air pollution

5.158 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by any deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen (N) availability that can then affect plant health, productivity and species composition.

5.159 In terms of vehicle traffic (which would be the main source of air pollution associated with the Local Plan Part 2), nitrogen oxides (NOx, i.e. NO and NO₂) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NOx can cause eutrophication of soils and water.

5.160 Changes in traffic distribution / volume could occur as a result of any of the Local Plan Part 2 policies (alone or in combination with other policies or plans) that permit development, particularly:

- *Policy 13 Residential and other residential led allocation; and*

■ *Policy 17A: Employment allocations.*

5.161 Policy 34 Transport Schemes and Mitigation also enables transport schemes to come forward but requires them to "demonstrate that they provide opportunities to minimise and where possible reduce pollution issues that are a barrier to achieving sustainable development and healthy communities." and "state how they will contribute to lowering emissions and contribute to the aim of achieving net-zero emissions by 2030."

5.162 Based on the Highways Agency Design for Road and Bridges (DMRB) Manual Volume 11, Section 3, Part 1⁴⁴ (which was produced to provide advice regarding the design, assessment and operation of trunk roads (including motorways)), it is assumed that air pollution from roads is unlikely to be significant beyond 200 m from the road itself. Where increases in traffic volumes are forecast, this 200 m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

5.163 The DMRB Guidance for the assessment of local air quality in relation to highways developments provides criteria that should be applied to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the DMRB guidance, affected roads which should be assessed are those where:

- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
- Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
- A change in speed band; or
- Road alignment will change by 5 m or more.

5.164 Recent case law, known as the Wealden judgment⁴⁵, has revised the method by which Natural England expects to see in-combination air pollution effects assessed. The implication of the judgment is that, where the road traffic effects of other plans or projects are known or can be reasonably estimated (including those of adopted plans or consented projects), then these should be included in road traffic modelling by the local authority whose Local Plan or project is being assessed. The screening criteria of 1,000 AADT should then be applied to the traffic flows of the plans in combination.

5.165 It has been assumed that only those roads forming part of the primary road network (motorways and 'A' roads) might be likely to experience any significant increases in

⁴⁴

<http://origin.standardsforhighways.co.uk/ha/standards/DMRB/vol11/section3.htm>

⁴⁵ Wealden District Council v. (1) Secretary of State for Communities and Local Government; (2) Lewes District Council; (3) South Downs National Park Authority and Natural England.

vehicle traffic as a result of development (i.e. greater than 1,000 AADT etc.).

Rutland Water SPA and Ramsar site

5.166 A small part of Rutland Water lies within 200m of both the A606 and A6003; however, these roads are sufficiently distant from Northampton that they are not likely to experience significant increases in traffic due to the Local Plan Part 2. Data on commuting patterns⁴⁶, based on 2011 census data, shows negligible traffic flows to/from Northampton that pass Rutland Water.

5.167 There will be no adverse effects on the integrity of Rutland Water SPA and Ramsar site, as a result of air pollution either alone or in combination with other plans or projects.

Upper Nene Valley Gravel Pits SPA and Ramsar site

5.168 The Upper Nene Valley Gravel Pits SPA and Ramsar site is not identified as sensitive to air pollution, or nitrogen more generally, either within the Site Improvement Plan or Standard Data Form (Appendix A). However, the supplementary advice on conservation objectives sets a target to "maintain concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values" for FLL, both within and outside the SPA. The Air Pollution Information System⁴⁷ does not show critical load or level values for the SPA features but does show a generally stable or falling trend for nitrogen (NOx) deposition at the site, over the last ten years.

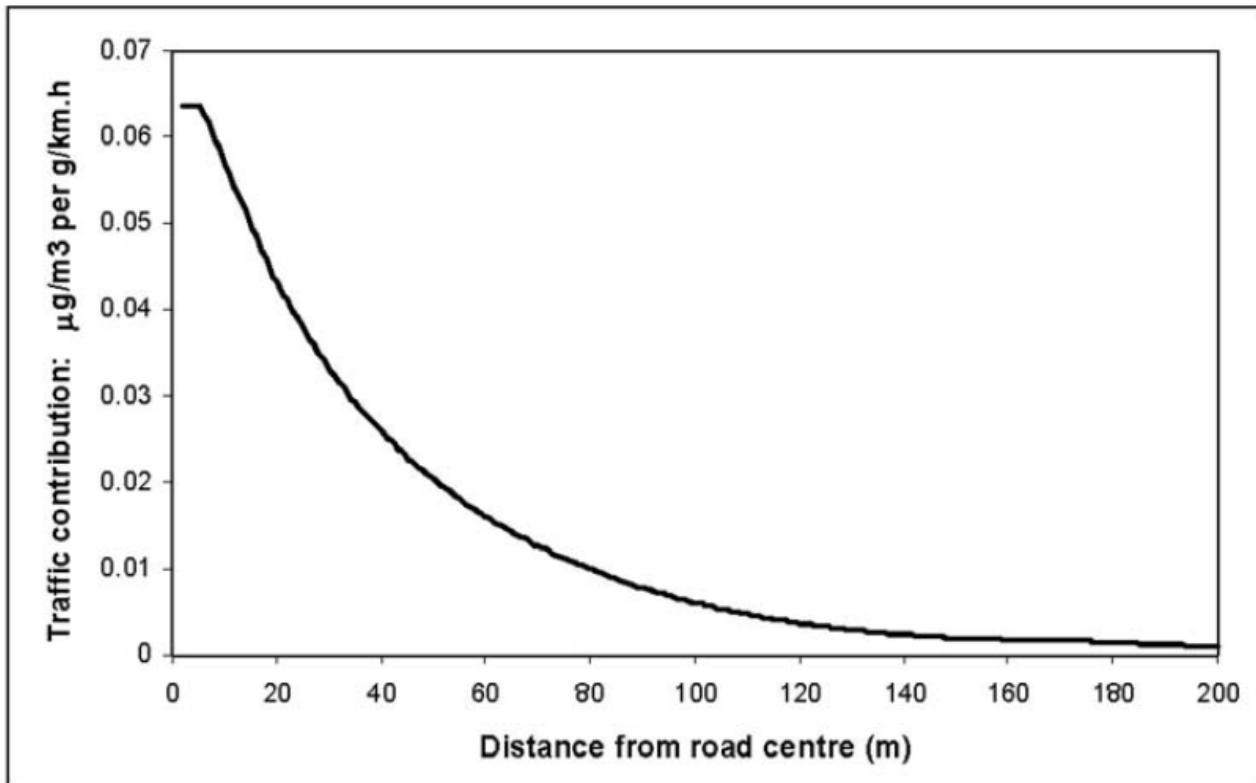
5.169 For the effects of nitrogen deposition to have an adverse effect on the integrity of the SPA or Ramsar, it would need to change habitats to such an extent that the site's qualifying bird species no longer feed from or use the habitat. While nutrient enrichment could change the floristic composition of the site's terrestrial habitats, it is unlikely to do so to the extent that birds and the species they depend on stop using the habitat.

5.170 Furthermore, the effects of nitrogen deposition from traffic reduce dramatically with distance (see **Figure 5.6**), and are further reduced if there are 'buffers' in between a road and the site; the 200 metre threshold is therefore at the limit of where significant effects might occur.

⁴⁶ DataShine Commute <http://commute.datashine.org.uk>

⁴⁷ Air Pollution Information System www.apis.ac.uk

Figure 5.6: Traffic contribution to pollutant concentration at different distances from the road centre⁴⁸



5.171 Only a very small portion of the Upper Nene Valley Gravel Pits SPA and Ramsar site is within 200m of an A-road. At Northampton Washlands (the portion of the SPA/Ramsar in the Local Plan Part 2 area), the road is located c.120m from the SPA and is separated by another water body and scrub habitat. The only portion of the SPA/Ramsar that is adjacent to an A-road is at Rushden / Stanwick, where the SSSI condition reports confirm that the site is either in favourable condition or unfavourable recovering (due to historic poor management).

5.172 Overall, the Upper Nene Valley Gravel Pits SPA and Ramsar site is not considered to be sensitive to air pollution to a degree that changes in traffic due to the Local Plan Part 2 would result in adverse effects on its integrity.

5.173 There are also areas of FLL within 200m of major roads: either side of the A428 (c.180m from the SPA/Ramsar at its closest point), and adjacent to the M1 (c.6km from the SPA/Ramsar at its closest point). In both cases, it is unlikely that nutrient enrichment would change the floristic composition of these areas of FLL (arable fields and pasture) to the extent that birds and the species they depend on stop using the habitat.

5.174 There will be no adverse effects on the integrity of Upper Nene Valley Gravel Pits SPA and Ramsar site, as a result of air pollution either alone or in combination with other plans or projects.

⁴⁸ Figure C1 from Design Manual for Roads and Bridges (May 2007) Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques. Part 1 HA207/7 Air Quality.

Chapter 6

Assessment summary and conclusions

A summary of the Appropriate Assessment findings and overall conclusions of the HRA

Assessment summary

6.1 A summary of the findings of the Appropriate Assessment is provided below. The scoping matrix identifies the policy that each effect type relates to (Appendix C).

Rutland Water SPA and Ramsar site

6.2 For the majority of the types of effect that could arise from the Local Plan Part 2, Rutland Water SPA and Ramsar site is too far from the Local Plan Part 2 area to be significantly affected by development associated with the plan.

6.3 The following effect has the potential for likely significant effects but, following the Appropriate Assessment, it was concluded that no adverse effects on the integrity of the site are anticipated.

Changes to water supply and water level management

6.4 Rutland Water is a primary source of urban water supply for Northampton. New development in the Local Plan Part 2 area, in combination with that from other areas within Anglian Water's region, could increase demand such that demand for water cannot be met sustainably. The 2019 Water Resources Management Plan sets out the measures required to balance water supply and demand without adverse environmental effects. These plan for Northampton's target number of homes set out in the Joint Core Strategy, but not the additional homes provided by the Local Plan Part 2. Anglian Water have reviewed the Local Plan Part 2 allocated sites (based on the Local Plan site options consultation, 2017) and confirmed that there will be no water supply issues.

6.5 Anglian Water later raised a concern in their response⁴⁹ to consultation on the Proposed Submission Local Plan Part 2 (first round Regulation 19 consultation) that policy wording should contain a commitment to water efficiency standards.

⁴⁹ <https://www.northampton.gov.uk/downloads/file/11401/ps1-053-anglian-water-001-redacted>

This has been incorporated into Policy 5; no other concerns were raised.

6.6 The sites allocated in the Local Plan Part 2 (Main Modifications) are slightly different to the list proposed in the first round of Regulation 19 consultation, with four new development sites but the overall quantum of development is similar to that which Anglian Water has previously been consulted on (4,538 in the first round consultation; 3,804 in the second round; now 3,838).

6.7 It is therefore not considered that there will be significant effects on water supply.

Upper Nene Valley Gravel Pits SPA and Ramsar site

6.8 The proximity of the Upper Nene Valley Gravel Pits SPA and Ramsar site to the Local Plan Part 2 area means that there are more types of potentially significant effect.

6.9 The following effects have the potential for likely significant effects but, following the Appropriate Assessment, it was concluded that no adverse effects on the integrity of the site are anticipated.

Physical habitat loss of damage

6.10 No sites are allocated within the SPA/Ramsar and development outside of allocated sites is unlikely to be permitted within the SPA/Ramsar due to protection provided by policies in the Local Plan Part 2.

Loss of functionally-linked land

6.11 The Local Plan Part 2 could permit development within areas of habitat used by Golden Plover or Lapwing from the SPA/Ramsar. One allocated site contains habitat identified as potentially suitable for use by Golden Plover or Lapwing, and development of unallocated sites could also be situated on FLL.

6.12 Mitigation for the potential loss or fragmentation of FLL is provided by Policy 29 which requires applicants to undertake ecological surveys and assess the effects of development on FLL, and Policy 30 which requires developments to demonstrate that there will be no adverse effects on the integrity of the SPA/Ramsar, for example from loss or fragmentation of supporting habitat. This mitigation is sufficient to prevent adverse effects on integrity due to development at unallocated sites.

6.13 At LAA1098 (The Green, Great Houghton), where the location and scale of development mean that the design principles for the site will affect the scale of effects on FLL, Policy 41 provides additional mitigation. This policy, which sets design principles for the site, reiterates the need for bird surveys, requires appropriate mitigation if significant numbers

of Golden Plover or Lapwing are identified, and ensures that the design of the SANG at the site takes into account FLL. The wording of this policy has been agreed with Natural England and no effects on the integrity of the SPA/Ramsar are anticipated.

6.14 At some sites, habitat may not currently be suitable habitat for SPA bird species, but could become suitable in the future. For example, there is a small area of land adjacent to site LAA0204 The Farm, Hardingstone which was previously identified as 'optimal' habitat but which, in its current state, does not provide suitable habitat for Golden Plover or Lapwing as habitat succession has started to take place. However, it does not negate the potential for this area of land to be restored to a condition where it could function as supporting habitat for the SPA. However, if the situation changed, the safeguards within the policies provide assurance that AEOI could be avoided or mitigated, if necessary.

Changes to bird sightlines

6.15 Development within 250m of the SPA/Ramsar could affect bird sightlines. Two allocated sites (LAA1101 and LAA1107) are within 250m and the Local Plan Part 2 could permit other development within the same zone.

6.16 Policies within the Local Plan Part 2 provides sufficient safeguards against this potential effect. Policy 29B provides general protection for the SPA/Ramsar and Policy 30 specifically requires new development within 250m of the SPA/Ramsar to demonstrate that it will not have a significant effect on birds.

Non-physical disturbance

6.17 Development within 2km of the SPA/Ramsar has the potential for significant effects due to noise, vibration or light, particularly in combination with other development as multiple developments could have a general urbanising effect. Six of the allocated sites are within 2km of the SPA/Ramsar and the Local Plan Part 2 also permits some development outside of allocated sites.

6.18 Policy 29B provides general protection for the SPA/Ramsar, and Policy 30: Upper Nene Valley Gravel Pits Special Protection Area provides specific mitigation for non-physical disturbance effects, requiring major developments to demonstrate that they will have no adverse effects on the integrity of the SPA/Ramsar.

6.19 This mitigation is considered sufficient to ensure no significant effects on integrity occur from non-physical disturbance.

Recreation pressure

6.20 The SPA/Ramsar is sensitive to visitor pressure and it is considered that any residential development within 3km of the site has the potential to contribute to visitor pressure, alone or in combination with other development.

6.21 *Policy 13: Residential and other residential led allocation* allocates up to 2,547 new homes on 19 sites within 3km of the SPA/Ramsar, and other policies permit development outside of the allocated sites. The portion of the SPA/Ramsar that is within 3km of the Local Plan Part 2 area – Northampton Washlands – is also within 3km of development within South Northamptonshire, therefore in-combination effects are likely.

6.22 The Local Plan Part 2 sets out mitigation in Policy 30: Upper Nene Valley Gravel Pits Special Protection Area, which requires that

"Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.

Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the UNVGP SPA Supplementary Planning Document. Applications comprising a new gain in residential units within 3km of the Upper Nene Valley Gravel Pits SPA will, in combination, have an adverse effect on the integrity of the SPA if not mitigated.

The Local Planning Authority has adopted a mitigation strategy for Unit 1 of the Upper Nene Valley Gravel Pits SPA which must be referred to when preparing an application that is located within 3km of Unit 1 of the SPA. Residential development will be required to pay a Strategic Access Management and Monitoring (SAMM) contribution and / or provide bespoke mitigation such as a Suitable Alternative Natural Greenspace (SANG) in order to mitigate recreational impact."

6.23 The recreation mitigation strategy, which forms an addendum to the SPD⁵⁰ requires residential development within 3km of the SPA/Ramsar to contribute to funds for Strategic Access, Management and Monitoring (SAMM). The

strategy also states that: "Developments of 10 dwellings or more will be required to pay the SAMM and / or provide other suitable mitigation and the advice of Natural England should be sought at the outset of the planning process." And "Other large scale developments may need project level HRAs and/or bespoke mitigation such as SANGs. Proposed schemes of 10+ dwellings are required to liaise with Natural England at the outset to discuss SPA mitigation." This is the case for site LAA1098, where the mitigation agreed is set out in Policy 41.

6.24 Further mitigation is provided in Policies 27, 28, 29A and 29B which require developments to provide new greenspace and provide general protection for the SPA/Ramsar.

6.25 At LAA1098 (The Green, Great Houghton), the large scale of development and its proximity to the SPA/Ramsar mean that the design principles set out in Policy 41 also influence how easy or attractive it will be for residents to visit the SPA/Ramsar versus other greenspaces. This development in combination with the 'Northampton South of Brackmills SUE' allocated in the JCS will result in a large volume of residential development at two sites that are close to each other and will therefore put pressure on the same local greenspaces for recreation.

6.26 Policy 41: The Green, Great Houghton (LAA1098) requires that:

"Winter surveys are undertaken to identify whether the site is used by over-wintering Golden Plover / Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat."

"Development must adhere to Policy 30 of this Plan, in particular with reference to recreational disturbance and functionally linked land associated with the Upper Nene Valley Gravel Pits Special Protection Area."

and

"Proposals must be informed by a masterplan for the whole allocation which will be expected to:... e. Provide a SANG within the area identified in Figure 20 [northern part of site] which provides the following: i. Protection, enhancement and / or creation of habitats in line with other policies of this plan. ii. Accessibility for residents' recreation including an off-lead dog walking area. iii. A circular walking route around the SANG and eastern development area. iv. A clear separation between the developed site and the village of Great Houghton in order to protect its setting and the heritage assets of the village. v. Formal and informal open space. vi. A SANG

⁵⁰ <https://www.northampton.gov.uk/downloads/file/12918/unvgp-spa-spd-addendum-mitigation-strategy-march-2022>

car park, vii. If any part of the SANG is proposed off-site, the SANG will need to be adjoining the site."

6.27 It is therefore considered that development management policies within the Local Plan Part 2 and the mitigation strategy that forms an appendix to the Upper Nene Valley Gravel Pits SPD provide sufficient mitigation to prevent residential development from having a significant effect on the SPA/Ramsar, either alone or in combination with other plans and projects.

Pet predation

6.28 Residential developments within 1.5km of the SPA/Ramsar could contribute to an increase in numbers of domestic cats. Three residential allocated sites are within this zone but road / river barriers at two of the sites mean that adverse effects are unlikely.

6.29 The area marked for SANG is potentially on FLL used by Golden Plover / Lapwing, in which case pet predation (as well as recreation pressure from this site) could affect birds from the SPA / Ramsar. Policy 41 therefore requires that:

"Winter surveys are undertaken to identify whether the site is used by over-wintering Golden Plover / Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat."

"Development must adhere to Policy 30 of this Plan, in particular with reference to recreational disturbance and functionally linked land associated with the Upper Nene Valley Gravel Pits Special Protection Area."

and

"Proposals must be informed by a masterplan for the whole allocation which will be expected to:... e. Provide a SANG within the area identified in Figure 20 [northern part of sites] which provides the following: i. Protection, enhancement and / or creation of habitats in line with other policies of this plan. ii. Accessibility for residents' recreation including an off-lead dog walking area. iii. A circular walking route around the SANG and eastern development area. iv. A clear separation between the developed site and the village of Great Houghton in order to protect its setting and the heritage assets of the village. v. Formal and informal open space. vi. A SANG car park, vii. If any part of the SANG is proposed off-site, the SANG will need to be adjoining the site."

6.30 The potential effects of pet predation from development at unallocated sites is mitigated by protection for the SPA/Ramsar set out in Policies 29B and 30.

Direct mortality

6.31 Although it is possible that new wind turbines could be installed and result in bird strike, policies within the Local Plan Part 2 protect the SPA/Ramsar such that significant effects would not arise.

Changes to water supply and water level management

6.32 The River Nene supplies water to both Rutland Water and Pitsford reservoirs. New development in the Local Plan Part 2 area, in combination with that from other areas within Anglian Water's region, could increase demand such that demand for water cannot be met sustainably. The 2019 Water Resources Management Plans sets out the measures required to balance water supply and demand, without adverse environmental effects. These plan for Northampton's target number of homes set out in the Joint Core Strategy, but not the additional homes provided by the Local Plan Part 2. Anglian Water have reviewed the Local Plan Part 2 allocated sites (based on the Local Plan site options consultation, 2017) and confirmed that there will be no water supply issues.

6.33 As described above in relation to Rutland Water, Anglian Water later raised a concern in their response⁵¹ to consultation on the Proposed Submission Local Plan Part 2 (first round Regulation 19 consultation) that policy wording should contain a commitment to water efficiency standards. This has been incorporated into Policy 5; no other concerns were raised.

6.34 The sites allocated in the Local Plan Part 2 (Main Modifications) is slightly different to the list proposed in the first round of Regulation 19 consultation, with four new development sites but the overall quantum of development is similar to that which Anglian Water has previously been consulted on (4,538 in the first round consultation; 3,804 in the second round; now 3,838).

6.35 It is therefore not considered that there will be significant effects on the SPA/Ramsar from water supply.

Changes to water quality

6.36 Policies that permit new development, changes in use or occupation could alter wastewater treatment loads and therefore affect the water quality of the River Nene, as could development sites with surface water drainage pathways to the River Nene. However, Policy 7: Flood risk and water

⁵¹ <https://www.northampton.gov.uk/downloads/file/11401/ps1-053-anglian-water-001-redacted>

management, along with Policy 30 which requires major developments to demonstrate that there will be no adverse effects on the integrity of the SPA/Ramsar due to run-off or discharges from the foul drainage system provide sufficient safeguards.

Air pollution

6.37 The SPA/Ramsar is not considered to be particularly sensitive to air pollution. For the effects of nitrogen deposition to have an adverse effect on the integrity of the SPA or Ramsar, it would need to change habitats to such an extent that the site's qualifying bird species no longer feed from or use the habitat. While nutrient enrichment could change the floristic composition of the site's terrestrial habitats (and associated FLL), it is unlikely to do so to the extent that birds and the species they depend on stop using the habitat.

Conclusions

6.38 The HRA screening assessment (**Chapter 4**) identified the need for Appropriate Assessment of the Northampton Local Plan Part 2, as likely significant effects could not be ruled out. The scope of the Appropriate Assessment (Appendix C) was then defined by considering each policy and site allocation, the type of development they could result in and their potential effects on European sites, alone and in combination.

6.39 The Appropriate Assessment has concluded that the Northampton Local Plan Part 2 (Main Modifications) will not result in adverse effects on the integrity of Rutland Water SPA and Ramsar site or Upper Nene Valley Gravel Pits SPA and Ramsar site.

6.40 Following consultation with Natural England, the wording of several of the policies in the Local Plan Part 2 has been amended to provide mitigation for potential effects identified in the previous version of the HRA report (first and second rounds of Regulation 19 consultation). A mitigation strategy for recreation pressure has also been adopted and forms an appendix to the Upper Nene Valley Gravel Pits SPD These policies and strategy ensure that any potential effects on the SPA/Ramsar sites can be identified and mitigated through the development management process.

6.41 With this mitigation in place, the Local Plan Part 2 will have no adverse effects on the integrity of any European sites, either alone or in combination with other plans or projects.

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June 2022

Appendix A

Attributes of the European sites with the potential to be affected by the Local Plan

Appendix A
 Attributes of the European sites with the potential to be affected by the Local Plan
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Table A.1: Attributes of the Upper Nene Valley Gravel Pits SPA and Ramsar Site

Site name (Area, ha)	Qualifying features	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
Upper Nene Valley Gravel Pits SPA (1,357 ha)	<p><i>Natura 2000 Standard Data Form</i></p> <p>Wintering populations of the following bird species:</p> <ul style="list-style-type: none"> <i>Anas clypeata</i> (Shoveler) <i>Anas Penelope</i> (Wigeon) <i>Anas platyrhynchos</i> (Mallard) <i>Anas strepera</i> (Gadwall) <i>Aythya farina</i> (Pochard) <i>Aythya fuligula</i> (Tufted duck) <i>Botaurus stellaris</i> (Great Bittern) <i>Fulica atra</i> (Coot) <i>Phalacrocorax carbo</i> (Great Cormorant) <i>Pluvialis apricaria</i> (European Golden Plover) <i>Podiceps cristatus</i> (Great Crested Grebe) <i>Vanellus vanellus</i> (Lapwing) Waterfowl assemblage (wintering and breeding populations) <p>(N.B. The compartment of the SPA within and directly adjacent to the plan area, known as Clifford Hill Gravel Pits or Northamptonshire Washlands, is used by a significant proportion of the site's Golden Plover, Lapwing and Wigeon populations⁵².)</p>	<p><i>Natura 2000 Standard Data Form</i></p> <ul style="list-style-type: none"> ■ Fishing and harvesting aquatic resources ■ Other urbanisation, industrial and similar activities ■ Modification of cultivation practices ■ Outdoor sports and leisure activities, recreational activities <p><i>Natural England site improvement plan</i></p> <ul style="list-style-type: none"> ■ Public access / disturbance – Disturbance from recreation (particularly walkers and dog owners) affects wintering birds by reducing the time available for feeding, and increasing energy expenditure when avoiding those sources of disturbance. ■ Planning permission general – There continues to be an increase in built and recreational development within and around the SPA leading to loss and fragmentation of habitat, and increased disturbance. Seven local planning authorities are involved with decision making; policies can be inconsistent across the authorities or provide insufficient protection. ■ Fisheries, freshwater – An increasing number of lakes are being utilised as freshwater fisheries; overstocking of certain fish species and issuing of licences to control fish-eating birds can be a problem. ■ Change in land management – Continued habitat management is required to ensure the balance of short grassland, reedbed, fen and open water is maintained. <p><i>Natural England: supplementary advice on conserving and restoring site features</i></p>	<p>In general, wintering populations of waterbirds rely on:</p> <ul style="list-style-type: none"> ■ Maintenance of the populations of species they feed on (see diets, below); ■ The site's ecosystem as a whole (see list of habitats, below); ■ Seasonal variations in water levels that maintain the mix of habitats at the site and that could be affected by climate change, extreme weather and/or land management; ■ Off-site habitats, which provide migratory 'stepping stones' and foraging habitat (rather than off-site breeding habitats; the site is designated for wintering species only) - particularly arable fields and pasture, which Golden Plover and Lapwing rely on; ■ Unobstructed flight lines / routes. <p><i>BTO Bird Facts</i>⁵³</p> <p>The site's qualifying bird species' diets are:</p> <ul style="list-style-type: none"> ■ Shoveler: omnivorous (incl. insects, crustaceans, molluscs, seeds); ■ Wigeon: mostly leaves, shoots, rhizomes, seeds; ■ Mallard: omnivorous; ■ Gadwall: leaves and shoots; ■ Tufted duck: mostly plants, small animals; ■ Bittern: mostly fish, amphibians, insects; ■ Coot: omnivorous but mostly plants;

⁵² West Northamptonshire Joint Core Strategy, para. 10.26

⁵³ <https://www.bto.org/about-birds/birdfacts>

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Site name (Area, ha)	Qualifying features	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
		<p>In addition to the above, the supplementary advice identifies the following vulnerabilities:</p> <ul style="list-style-type: none"> ■ Water quantity/quality –can affect the availability/suitability of feeding and roosting habitats, especially reedbeds and grassland within flood storage areas. ■ Air quality - exceeding 'critical values' for air pollutants may result in changes to the habitat substrate and therefore nesting, feeding or roosting habitats. ■ Changes in vegetation characteristics – the height, cover, variation and composition of vegetation enable successful feeding/concealment/roosting. ■ Human disturbance – particular risk from users entering the private land within the flood storage area. ■ Changes to site topography – may adversely affect supporting habitats ■ Loss of connectivity between feeding/roosting areas– both on-site and at off-site habitats. ■ Changes to water area and associated marginal habitat - can adversely affect the suitability of supporting open water habitat. ■ Loss of open terrain – need for large areas of open terrain, largely free of obstructions, in and around roosting and feeding areas ■ Water depth – bitterns are visual predators and rely on detecting prey in the water, therefore depth of water at critical times of year may be paramount for successful feeding. ■ Food availability – inappropriate management affecting the distribution, abundance and availability of prey may adversely affect the Great Bittern and golden plover populations. 	<ul style="list-style-type: none"> ■ Cormorant: fish; ■ Golden Plover: invertebrates (esp. beetles and earthworms), feeds extensively at night; ■ Great Crested Grebe: mostly fish, some aquatic invertebrates; ■ Lapwing: invertebrates from ground; will feed at night. <p><i>Natura 2000 Standard Data Form</i></p> <p>The mix of habitats⁵⁴ at the site (% cover) is:</p> <ul style="list-style-type: none"> ■ 49% N06: inland water bodies (standing water / running water); ■ 27% N14: improved grassland; ■ 19% N07: bogs, marshes, water fringed vegetation, fens; and ■ 5% N16: broad-leaved deciduous woodland.

⁵⁴ Habitat types: https://bd.eionet.europa.eu/activities/Natura_2000/Folder_Reference_Portal/NATHABS_HABCODE_090416.pdf

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Site name (Area, ha)	Qualifying features	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
Upper Nene Valley Gravel Pits Ramsar site (same area as SPA)	<p><i>Information Sheet on Ramsar Wetlands</i></p> <p>The sites regularly supports 20,000 or more waterbirds</p> <p>The site regularly supports 1% of the individuals in the populations of the following species:</p> <ul style="list-style-type: none"> Cygnus olor (Mute Swan) Anas strepera (Gadwall) <p>Noteworthy Fauna include those listed above for SPA</p>	<p><i>Information Sheet on Ramsar Wetlands</i></p> <p>Unspecified development: urban use – activities connected with ongoing urban development cause significant disturbance to wintering birds if unmanaged.</p> <p>Vegetation succession – Lack of grazing is leading to rank grassland, scrub / woodland. Whilst this is desirable in certain areas, widespread vegetation succession will result in a decrease in the availability of suitable habitat for key species.</p> <p>Introduction / invasion of non-native plant species – <i>Hydrocotyle ranunculoides</i> and <i>Crassula helmsii</i> present in small areas of the site.</p> <p>Recreation / tourism disturbance – access by people and dogs both on and off public rights of way is a significant course of disturbance in some areas. The site is also subject to a variety of recreational activities including fishing and water sports. Demand for access and formal / informal recreational activities within the Nene Valley are increasing; development of facilities / opportunities is often in an uncoordinated manner.</p>	<p>As for the SPA, with additional information on habitats and species at the site:</p> <p><i>Information Sheet on Ramsar Wetlands</i></p> <p>Open water, with associated wetland habitats including reedbeds, fen grassland and woodland which support a number of wetland plant and animal species including internationally important numbers of wintering and breeding wildfowl.</p> <p>This chain of both active and disused sand and gravel pits form an extensive series of shallow and deep open waters which occur in association with a wide range of marginal features, such as sparsely-vegetated islands, gravel bars and shorelines and habitats including reedswamp, marsh, wet ditches, rush pasture, rough grassland and scattered scrub.</p> <p>This range of habitats and the varied topography of the lagoons provide valuable resting and feeding conditions for concentrations of wintering waterbirds, especially ducks and waders. Species such as golden plover <i>Pluvialis apricaria</i> and lapwing <i>Vanellus vanellus</i> also spend time feeding and roosting on surrounding agricultural land outside the Ramsar site.</p> <p>The site provides flood water storage within the hydrological catchment.</p>

Table A.2: Attributes of Rutland Water SPA and Ramsar site

Site name (Area, ha)	Qualifying features	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
Rutland Water SPA (1,555 ha)	<p><i>Natura 2000 Standard Data Form</i></p> <p>Wintering populations of the following bird species:</p> <ul style="list-style-type: none"> <i>Anas clypeata</i> (Northern Shoveler) <i>Anas crecca</i> (Teal) 	<p><i>Natura 2000 Standard Data Form</i></p> <ul style="list-style-type: none"> ■ Human induced changes in hydraulic conditions ■ Pollution to groundwater ■ Other human intrusions and disturbances ■ Invasive non-native species 	<p>In general, wintering populations of waterbirds rely on:</p> <ul style="list-style-type: none"> ■ Maintenance of the populations of species they feed on (see diets, below); ■ The site's ecosystem as a whole (see list of habitats, below);

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Site name (Area, ha)	Qualifying features	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
	<i>Anas Penelope</i> (Wigeon) <i>Anas strepera</i> (Gadwall) <i>Aythya fuligula</i> (Tufted Duck) <i>Bucephala clangula</i> (Goldeneye) <i>Cygnus olor</i> (Mute Swan) <i>Fulica atra</i> (Coot) <i>Mergus merganser</i> (Goosander) <i>Podiceps cristatus</i> (Great Crested Grebe) Waterfowl assemblage	<p><i>Natural England Site Improvement Plan</i></p> <ul style="list-style-type: none"> ■ Water abstraction – Increased water abstraction is proposed that will radically alter water levels in the reservoir which may result in a proportion of waterbirds utilising areas provided as compensation but which are currently outside the SPA. ■ Inappropriate water levels – Water levels of the reserve are managed primarily for public water supply and water storage and not specifically for non-breeding water birds. This can influence the number of specific species of non-breeding water birds using the site at certain times of the year. At the moment, this is not causing any long-term deterioration of the site. However, when the proposed new increased abstraction regime is implemented, appropriate management of the water levels in the compensation and mitigation water bodies will be required to offset the impacts of the abstraction. ■ Direct impact from 3rd party – Cumulative impacts from unregulated third party activities like private firework displays in properties adjacent to the SPA, hot air balloon flights, and private aircraft flights is unknown. Investigation is needed to better understand the frequency of these disturbances and the cumulative impacts of these activities upon the waterbirds using Rutland Water. ■ Invasive species – Rutland Water has been colonised by several non-native species and not all are having a positive impact on the SPA interest features. ■ Water pollution – The inflows into Rutland Water currently receive regulated discharges of treated sewage as well as unregulated treated sewage discharges from septic tanks. Further nutrient inputs come from diffuse sources which maintain the reservoir in a highly eutrophic state and has led in the past to regular algal blooms. 	<ul style="list-style-type: none"> ■ Predictable seasonal variations in water levels, which could be affected by climate change, extreme weather and/or changes in water abstraction or discharge; ■ Off-site habitats, which provide migratory 'stepping stones' and foraging habitat (rather than off-site breeding habitats; the site is designated for wintering species only); and ■ Unobstructed flight lines / routes. <p><i>BTO Bird Facts</i>⁵⁵</p> <p>The site's qualifying bird species' diets are:</p> <ul style="list-style-type: none"> ■ Shoveler: omnivorous (incl. insects, crustaceans, molluscs, seeds); ■ Teal: omnivorous (mostly seeds), feeds at night; ■ Wigeon: mostly leaves, shoots, rhizomes, seeds; ■ Gadwall: leaves and shoots; ■ Tufted duck: mostly plants, small animals; ■ Goldeneye: insects, molluscs and crustaceans; ■ Mute Swan: aquatic vegetation, also grazes on land and occasionally takes insects, molluscs and small amphibians; ■ Coot: omnivorous but mostly plants; ■ Goosander: fish; ■ Great Crested Grebe: mostly fish, some aquatic invertebrates. <p><i>Natura 2000 Standard Data Form</i></p> <p>The mix of habitats⁵⁶ at the site (% cover) is:</p> <ul style="list-style-type: none"> ■ 80% N06: inland water bodies (standing water / running water);

⁵⁵ <https://www.bto.org/about-birds/birdfacts>

⁵⁶ Habitat types: https://bd.eionet.europa.eu/activities/Natura_2000/Folder_Reference_Portal/NATHABS_HABCODE_090416.pdf

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Site name (Area, ha)	Qualifying features	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
		<ul style="list-style-type: none"> ■ Planning permission general – In the wider area surrounding the SPA, wind farm and other development is being proposed and is taking place. However, the impact upon the waterfowl behaviour during nocturnal migration and dispersal to and from the reservoir, and their interaction with the environment in the surrounding countryside is poorly understood. ■ Public access / disturbance – The reservoir and surrounding area is a very important destination for undertaking recreational activities. These include a range of water sports, fishing, cycling, birdwatching and walking. Several large events are also held on the banks of the reservoir each year. Future recreational proposals will need to avoid likely significant effects on the SPA. ■ Fisheries: Rutland Water is currently managed as a put and take trout fishery. Trout have a controlling impact on coarse fish populations and future changes in coarse fish populations could create a shift in the ecological balance of the water body. <p><i>Natural England: supplementary advice on conserving and restoring site features</i></p> <p>In addition to the above, the supplementary advice identifies the following vulnerabilities:</p> <ul style="list-style-type: none"> ■ Water supply - critical for SPA features that are dependent on wetland habitats supported by surface water, especially at certain times of year. ■ Air quality – exceeding ‘critical values’ for air pollutants may result in changes to the habitat substrate and therefore nesting, feeding or roosting habitats. ■ Loss of connectivity – the ability to move to and from feeding and roosting areas is critical to the breeding success of species present on the site, both on-site and at off-site habitats. ■ Water depth – the SPA requires extensive areas of water for feeding, and water depth at critical times of year is paramount for successful feeding, fitness and survival. 	<ul style="list-style-type: none"> ■ 10% N19: mixed woodland; ■ 9.9% N09: dry grassland /steppes; and ■ 0.1% N07: bogs, marshes, water fringed vegetation, fens.

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Site name (Area, ha)	Qualifying features	Key vulnerabilities	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
		<ul style="list-style-type: none"> ■ Food availability – inappropriate management might affect the distribution, abundance and availability of food plants may adversely affect the sustainability of the population. 	
Rutland Water Ramsar site (same area as SPA)	<i>Information Sheet on Ramsar Wetlands</i> Assemblages of international importance, supporting 20,000 or more waterbirds Species / populations occurring at levels of international importance, supporting 1% of the individuals in a population of one species of waterbird Qualifying species / populations: <i>Anas strepera strepera</i> (Gadwall) <i>Anas clypeata</i> (Northern Shoveler)	No vulnerabilities listed	As for the SPA, with additional information on habitats and species at the site: <i>Information Sheet on Ramsar Wetlands</i> Rutland Water is a large eutrophic man-made pump storage reservoir created by the damming of the Gwash Valley in 1975. The reservoir is in a lowland setting receiving the majority of its water from the Nene (90%) and Welland (10%). In general the reservoir is drawn down in the summer and filled during the autumn and winter months when river levels are high. The main habitats are open water and a mosaic of lagoons, reedswamp, marsh, old meadows, scrub and woodland. The main habitat is the open water of the main body of the reservoir. This is deep water with some macrophyte growth down to 3 metres (average depth 14 m, maximum depth 34 m). The western end of the reservoir contains three bunded areas with their own water supply. These are managed by manipulating the water level to produce seasonal inundation and conditions for breeding wildfowl. They include several small artificial islands and a 2 ha reedbed. The rest of the site is made up of adjacent woodland and grazed grasslands that are used by wintering wigeon and swans and provide a buffer from activities adjacent to the site. In addition to the site's qualifying species, there are a number of other waterbird species that occur at the site in nationally important numbers.

Appendix B

Plans and projects with the potential for in-combination effects

Table B.1: Part 1 Local Plans

West Northamptonshire Joint Core Strategy (JCS) ⁵⁷	
Status	
Adopted December 2014. Forms Part 1 of the suite of Local Plans in the West Northamptonshire region, which includes Northampton, and is therefore part of the Development Plan for Northampton.	
Types of development with the potential for in-combination effects	
Makes provisions for a total of 47,620 net additional dwellings across the plan area. These are distributed between: Daventry District (12,730); Northampton (18,870); South Northamptonshire District (11,020).	
Reference to European sites	
Policy BN4 (Upper Nene Valley Gravel Pits Special Protection Area) requires that new development will need to demonstrate that there will be no significant adverse effects on the integrity of the SPA, including loss of supporting habitat and impacts due to water runoff, water abstraction or discharges from the drainage system. New development that will lead to an increase in recreational activity at the SPA will require mitigation. New development within 250m of the SPA must also undertake an assessment to demonstrate no effect on sightlines for birds – if directly adjacent to existing buildings, it should reflect surrounding building heights.	
North Northamptonshire Joint Core Strategy (JCS) ⁵⁸	
Status	
Adopted July 2016 and forms the strategic guidance for the Local Plans for Corby, East Northamptonshire, Kettering and Wellingborough. North Northamptonshire borders the West Northamptonshire region to the north.	
Types of development with the potential for in-combination effects	
The JCS outlines the need for housing of 34,900 net additional dwellings over the plan period 2011-31. Policy 28 sets out the distribution of these dwellings between districts - with Kettering Borough to absorb 10,400 dwellings and Wellingborough 7,000.	
One of the most significant proposals is for the sustainable urban extension with around 2,500 homes to the East of Rushden.	
Reference to European sites	
The JCS references the Upper Nene Valley Gravel Pits SPA and Ramsar site as a significant and protected environmental asset. The JCS requires that any new residential development proposed within 3km of the designated site where schemes involve a net gain in residential units. If mitigation measures cannot be identified, the development will not be permitted.	
Policy 4 (Biodiversity and Geodiversity) requires that the plan will protect the designated site from unacceptable levels of access and managing pressures for access to and disturbance of sensitive habitats. It also requires that any developments likely to have an adverse impact, either alone or in combination, on the Upper Nene Valley Gravel Pits SPA and Ramsar site or other designated site must satisfy HRA requirements. Mitigation strategies may involve contributing to: access and visitor management measures within the SPA; improvement of existing greenspace and recreational routes; or the monitoring of impacts of new development on the European sites to inform future measures.	

Table B.2: Part 2 Local Plans

South Northamptonshire Part 2 Local Plan ⁵⁹	
Status	
Adopted July 2020 and builds on the policies of the adopted West Northamptonshire JCS and covers the whole of the administrative area of South Northamptonshire. South Northamptonshire falls within the West Northamptonshire region and borders the southern half of Northampton.	
Types of development with the potential for in-combination effects	
The Draft Plan provides for 11,020 net additional dwellings over the plan period for 2011-2029, reflecting the provisions in Policy S3 of the West Northamptonshire JCS. However South Northamptonshire carried out their own Housing Needs Assessment in line with the revised NPPF (2018), giving a lower 'housing need' figure of 6,320.	

⁵⁷ Northamptonshire County Council (2014), West Northamptonshire Joint Core Strategy, March 2022, <https://www.northampton.gov.uk/download/downloads/id/12080/01-west-northamptonshire-joint-core-strategy-reduced.pdf>

⁵⁸ Northamptonshire County Council (2016), North Northamptonshire Joint Core Strategy, March 2022, <http://www.nnjpu.org.uk/docs/Joint%20Core%20Strategy%202011-2031%20High%20Res%20Version%20for%20website.pdf>

⁵⁹ Northamptonshire County Council (2020), South Northamptonshire Part 2 Local Plan, March 2022, <https://www.southnorthants.gov.uk/download/downloads/id/6816/south-northamptonshire-local-plan-part-2-2011-2029.pdf>

<p>South Northamptonshire Part 2 Local Plan⁵⁹</p> <p>The distribution of housing provision allocates new dwellings relatively evenly – 2,160 in Brackley; 2,650 in Towcester town; 2,360 in the South Northamptonshire rural area; and 3,850 in the Northampton Related Development Area (NRDA).</p> <p>Reference to European sites</p> <p>In line with the overarching JCS Policy BN4, Policy NE1 (Upper Nene Gravel Pits Special Protection Area) requires that any new development within a 3km zone of the SPA must undertake an assessment regarding adverse effects on the integrity of the SPA.</p> <p>The LPA will also prepare a Mitigation Strategy Document concerning the Upper Nene Valley Gravel Pits SPA and Ramsar site within 12 months of the adoption of the plan.</p> <p>The local authority has adopted the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document (SPD).</p>
<p>Daventry District Settlements and Countryside (Part 2) Local Plan⁶⁰</p> <p>Status</p> <p>Adopted February 2020 and forms part of the Development Plan. Daventry District falls within the West Northamptonshire region and borders the northern half of Northampton.</p> <p>Types of development with the potential for in-combination effects</p> <p>Policy S3 of the West Northamptonshire JCS sets out that over 2011-2029, 12,730 net additional dwellings will be delivered in Daventry District, with Daventry town accounting for 4,620 dwellings. As of April 2018, 2,581 dwellings had been delivered against this requirement, with the majority in rural areas.</p> <p>Reference to European sites</p> <p>Policy ENV4 (Green Infrastructure) does not directly reference the SPA. However, it requires that proposals will be supported that would contribute to the aims and objectives of the Nene Valley Nature Improvement Area project on habitat restoration, creation and connectivity.</p>
<p>The Plan for the Borough of Wellingborough (PBW)⁶¹</p> <p>Status</p> <p>Adopted February 2019. The Plan is now formally part of the Development Plan, forming Part 2 of the Local Plan for the borough. This Part 2 Plan fully supersedes the policies in the Town Centre Area Action Plan (2009) and saved policies from Borough of Wellingborough Local Plan (1999-2004). Wellingborough falls within the North Northamptonshire region and borders the west of Northampton Borough.</p> <p>Types of development with the potential for in-combination effects</p> <p>Policy 28 the North Northamptonshire Joint Core Strategy (JCS) allocates 7,000 net additional dwellings to Wellingborough over the plan period of 2011-31. The Draft Plan for Wellingborough reaffirms that, detailing that the majority of these will be provided in the Growth Town of Wellingborough (5,750), with the remainder distributed across villages.</p> <p>Reference to European sites</p> <p>The Plan recognises that the Upper Nene Valley Gravel Pits SPA and Ramsar site lies in close proximity to several sites allocated in the Plan, and requires that mitigation measures are carried out in respect of potential recreation pressures, in accordance with Policy 4 of the North Northamptonshire JCS. In particular Policy Site 1 (Wellingborough East) requires that 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, which may involve providing alternative accessible greenspace within the development, or access and visitor management measures within the SPA.</p> <p>The local authority has adopted the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document (SPD).</p>

Table B.3: Neighbourhood Plans

<p>Duston Neighbourhood Plan⁶²</p> <p>The Duston Neighbourhood Plan was 'made' in December 2015, following examination in May 2015 and a successful referendum in November 2015. The plan covers the area corresponding to Duston Parish, a north-west suburb of Northampton with a population of around 15,000 (2011). The plan's housing provision is in line with the Joint Core Strategy.</p>
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⁶⁰ Daventry District Council (2020), Settlements and Countryside Local Plan, March 2022, <https://www.daventrydc.gov.uk/EasySiteWeb/GatewayLink.aspx?alld=51031>

⁶¹ Borough Council of Wellingborough (2019), The Plan for the Borough of Wellingborough, March 2022, https://wellingborough-consult.objective.co.uk/events/34092/5075788_accessible.pdf

⁶² Northamptonshire County Council (2015), Duston Neighbourhood Plan, March 2022, <https://www.northampton.gov.uk/download/downloads/id/8670/duston-neighbourhood-plan---made-version-december-2015.pdf>

Appendix B
Plans and projects with the potential for in-combination effects

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Duston Neighbourhood Plan ⁶²
Spring Boroughs Neighbourhood Plan ⁶³
The Spring Boroughs Neighbourhood Plan was 'made' in April 2016, following examination in September 2015 and a successful referendum in March 2016. The plan covers an area within central Northampton adjacent to the town centre and within the Castle Walls. The plan's housing provision is in line with the Joint Core Strategy.
Growing Together Neighbourhood Plan ⁶⁴
The Growing Together Neighbourhood Plan was 'made' in April 2017, following examination in November 2016 and a successful referendum in February 2017. The plan covers the communities of Blackthorn, Cherry Lodge, Goldings, Lings, Lingswood Park, Lumbertubs and Overstone Lodge – which lies to the north-east of Northampton town centre. The plan permits small scale residential development (1-9 dwellings).
Great Houghton Neighbourhood Plan ⁶⁵
The Great Houghton Neighbourhood Plan was 'made' in May 2022, following examination in February 2022 and a successful referendum in March 2022. The plan covers Great Houghton and the eastern edge of Brackmills. Its policies set out principles for development including the protection of heritage, landscape and biodiversity; but the plan does not allocate any development that would be in addition to the Local Plan.

Table B.4: Other Plans

Anglian Water - Water Resource Management Plan 2019 ⁶⁶ / Water Resources Management Plan Draft (2025-2050)
Status The WRMP was adopted in December 2019 and sets out how Anglia Water plan to maintain the water supply-demand balance from 2020-2045. The 2025-2050 WRMP is currently in draft version, following public consultation in November 2022. It presents the Preferred Plan of Anglia Water and the final plan will be published in August 2023.
Types of development with the potential for in-combination effects The 2019 plan develops a number of feasible options for maintaining the supply-demand balance in the region. Key features include: demand management in all Water Resource Zones (WRZs), a river augmentation scheme, the transfer of resources from areas of surplus to areas of deficit, the selection of a trading option, and the deferral of resource development to the end of the forecast period (including water reuse schemes and the recommissioning of a reservoir). The priority of the 2025-2050 plan is demand management, supported by targeted supply-side investment. It also promotes transfers across the region from areas of surplus to areas of deficit. It plans to deliver environmental benefits by reducing abstraction from the environment and ensuring no deterioration in the ecological status of water bodies.
Reference to European sites The plans recognise that the region is home to a significant proportion of wetland sites or conservation interest. Rutland Water is an Anglian Water reservoir, and the River Nene is one of the watercourses that feeds Rutland Water and Pitsford reservoir.
Water Resources East - The Emerging Water Resources Regional Plan for Eastern England (2022) ⁶⁷
Status The Emerging Plan was published for consultation in January 2022, and will inform individual water companies' Water Resources Management Plans. Types of development with the potential for in-combination effects

⁶³ Northamptonshire County Council (2016) Spring Boroughs Neighbourhood Plan, March 2022, <https://www.northampton.gov.uk/download/downloads/id/8958/spring-boroughs-neighbourhood-plan-made-version.pdf>

⁶⁴ Northamptonshire County Council (2017), Growing Together Neighbourhood Plan, March 2022, <https://www.northampton.gov.uk/download/downloads/id/10249/20170310-gtnp-made-version-april-formatted.pdf>

⁶⁵ Northamptonshire County Council (2022), Great Houghton Neighbourhood Plan, May 2022, <https://www.northampton.gov.uk/info/200205/planning-for-the-future/2534/great-houghton-neighbourhood-plan>

⁶⁶ Anglian Water (2019) Water Resource Management Plan, March 2022, <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf>

⁶⁷ Water Resources East (2022) The Emerging Water Resources Regional Plan for Eastern England, January 2022, <https://wre.org.uk/wp-content/uploads/2022/01/WRE-Emerging-Plan.pdf>

Sets out strategic options for balancing water demand and supply within the region, across multiple water companies' areas of responsibility. The emerging strategy includes principles for no net export of water from the region, and a portfolio of water management options including desalination, reservoirs, effluent re-use and aquifer storage and recovery.

Reference to European sites

None

Northamptonshire Transportation Plan (2012)⁶⁸

Status

The Northamptonshire Transportation Plan was adopted in March 2012 and sets out the transport policies, objectives and vision for the longer term.

Types of development with the potential for in-combination effects

The plan aligns with the statutory West and North Northamptonshire Joint Core Strategies. It is the overarching transport plan that sets out strategic aims and goals for the region, and is accompanied by a number of daughter documents on specific modes and areas, including Northampton Town Transport Strategy (2013); and thematic strategies for bus, rail, cycling, walking, major roads, highway development, parking, and road freight.

The Joint Core Strategy and Transportation Plan between them define the transport schemes for Northampton.

Reference to European sites

Strategic Policy 25 states that 'we will avoid or minimise harmful effects on the natural and historic environment when planning and designing new transport infrastructure schemes'. Strategic Policy 22 (on reducing the impact of motor vehicles) further states that any proposals that would significantly harm a European site would not be supported by the strategy.

Northamptonshire Minerals and Waste Local Plan (2017)⁶⁹

Status

The Northamptonshire Minerals and Waste Local Plan was adopted in July 2017 as an updated version of the previously adopted 2014 plan. It sets out the land use planning strategy for minerals and waste related development in the county.

Types of development with the potential for in-combination effects

The plan provides the basis for determining planning applications for waste and minerals-related development in Northamptonshire, and allocates specific sites for waste and minerals development.

Minerals development can include the extraction of primary aggregates and the use of secondary (e.g. recycled) aggregates.

Waste development can include the collection, processing and disposal of waste, including hazardous waste.

Reference to European sites

The plan states:

"As the former gravel pits in the Nene Valley are now designated as a site of European importance in relation to birds (Upper Nene Valley Gravel Pits SPA), it is important that further extraction from allocated sites in this valley will not lead to adverse effects on the integrity of this designation. Potential sites were subject to HRA through the plan-making process. The planning application for mineral extraction at the Earls Barton West extension (M4) site will be required to undergo further HRA to ensure that development would not adversely affect the integrity of the SPA sites."

and

"Waste management facilities involving advanced treatment often include some form of emission stack (chimney) and increasingly feature the use of lighting for the joint purpose of security and visual interest, and may include the use of reflective surfaces as a design feature. This is particularly important in Northamptonshire given the presence of military flight paths and large numbers of migratory birds. The presence of tall structures (particularly where involving atmospheric emissions) or reflective surfaces under flight paths may present air safety risks. Proposals for development surrounding areas known to be of importance for migratory bird species (e.g. the Upper Nene Valley Gravel Pits SPA and associated habitats) should also consider the potential for building bird strike resulting from tall structures and reflective surfaces. It is therefore important to highlight the need for consideration of such matters during the formative stages of proposal research and design."

⁶⁸ Northamptonshire County Council (2012) Northamptonshire Transportation Plan, March 2022, <https://www.northamptonshire.gov.uk/councilservices/northamptonshire-highways/transport-plans-and-policies/Documents/Northamptonshire%20Transportation%20Plan%20-%20Fit%20for%20Purpose.pdf>

⁶⁹ Northamptonshire County Council (2017), Northamptonshire Minerals and Waste Local Plan, March 2022, <https://www.northamptonshire.gov.uk/councilservices/environment-and-planning/planning/planning-policy/minerals-and-waste-planning-policy/Publishing/Images/Pages/update-of-the-adopted-minerals-and-waste-local-plan/MWLP%20for%20adoption%20final%20REDUCED%20wCOVER.pdf>

Appendix C

Scoping matrix

The matrix below shows which types of impacts on European sites could potentially result from each of the policies and sites allocated in the Local Plan Part 2. Where a site is not expected to have a particular type of impact, the relevant cell is shaded green. Where a site could potentially have a certain type of impact, this is shown in orange. The final column sets out the nature of potential significant effects if they were to arise. Where uncertain or likely significant effects are identified, these are considered further in **Chapter 5** Appropriate Assessment.

Appendix C
Scoping matrix

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Table C.1: Scoping matrix

Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
Policy 1: Presumption in favour of sustainable development	None – this policy describes the overall strategy for development within Northampton but will not itself result in new development.	None	No
Policy 2: Place making and design	None – this policy sets out design principles for development but will not itself result in new development.	None	No This policy states that development should contribute to good place making by <i>"Sustaining, protecting and enhancing heritage and natural environment assets, including prospective non-designated assets and setting and those included on Local Lists as well as those already statutorily protected. Additionally future development must not leave these assets vulnerable to risk and, wherever possible, should promote the use, understanding and enjoyment of the historic and natural environments as an integral part of good placemaking."</i> This could provide some mitigation for impacts on European sites.
[Policy 3 deleted in Main Modifications]			
Policy 4: Amenity and layout	None – this policy sets out design principles for development but will not itself result in new development.	Recreational pressure	Yes This policy requires that new developments ensure "adequate access to both high quality recreational and semi-natural green spaces for all residents", which could in theory encourage development close to existing sites such as the SPA.
Policy 5: Carbon reduction, community energy networks, sustainable design and construction, and water use	Renewable energy installations (e.g. wind turbines)	Direct mortality Non-physical disturbance	Yes This policy encourages the installation of renewable energy technologies, which could affect SPA bird populations. This policy also requires residential development to achieve a water efficiency standard of 110l per person per day (Building Regulations Part G2). This could provide mitigation for effects due to changes in water level e.g. abstraction to meet demand for water).
Policy 6: Health and wellbeing	Health facility development Changes in vehicle traffic	Air pollution Changes to water levels and/or quality	Yes

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Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
	Changes to water demand and discharge		This policy permits the development of new health facilities. Although likely to be small-scale, development could contribute to a change in the number of vehicle trips (and therefore air pollution) and water demand / discharge.
Policy 7: Flood risk and water management	None – this policy will not result in new development.	None	No Supports proposals that comply with standards for surface water and SuDS must be incorporated into the design of major development and could therefore provide mitigation for water quality effects. Water quality standards are set locally in Northamptonshire County Council's Local Standards and Guidance for Surface Water Drainage in Northamptonshire.
Policy 8: Supporting Northampton Town Centre's role	Retail, leisure and employment development Changes in vehicle traffic Changes to water demand and discharge	Air pollution Changes to water levels and/or quality	Yes This policy permits development within the town centre (i.e. changes of use, redevelopment, or brownfield development). Although likely to be small-scale, development could contribute to a change in the number of vehicle trips to the town centre (and therefore air pollution) and water demand / discharge.
Policy 9: Regeneration opportunities in the Central Area	Residential and mixed use development Changes in population Changes in vehicle traffic Changes to water demand and discharge	Recreation pressure Pet predation Air pollution Changes to water levels and/or quality Non-physical disturbance Loss of functionally-linked land Fragmentation Loss of bird sightlines	Yes This policy encourages the regeneration of sites within the town centre and wider central area, for housing and economic development. Residential development could increase the demand for greenspace for recreation, traffic (and air pollution), and water demand / discharge. Depending on the location of the sites, there is also the potential for the loss of functionally-linked land or fragmentation (if on or near greenspace/waterbodies); or non-physical disturbance (noise / light), pet predation or loss of bird sightlines if the sites are close to a European site (i.e.in the southeast corner of the Central Area). The policy refers to some named sites, but also enables development on other, as yet unidentified sites. The quantum of housing provided by allocated sites named in this policy has been assessed under Policy 13, and employment under Policy 17A. The potential for regeneration development outside of these allocated sites is assessed under this policy.
Policy 10: Supporting and safeguarding the University of Northampton Waterside Campus	Education development Potential changes in population Changes in vehicle traffic Changes to water demand and discharge	Recreation pressure Air pollution Changes to water levels and/or quality	Yes This policy permits the enhancement of University facilities and improvements in connectivity to the town. If the development accommodates an increase in student / staff numbers or significantly alters the mix of uses at the site, it could increase traffic (air pollution), water demand / discharge and trips to local greenspace.

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Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
Policy 11: Managing hotel growth	Hotel development Changes in visiting population Changes in vehicle traffic Changes to water demand and discharge	Recreation pressure Air pollution Changes to water levels and/or quality	Yes This policy permits new hotels within the town centre and Enterprise Zone. New hotels could increase traffic (air pollution), water demand / discharge, and trips to local greenspace.
Policy 12: Development of main town centre uses	Residential and mixed use development Changes in population Changes in vehicle traffic Changes to water demand and discharge	Recreation pressure Pet predation Air pollution Changes to water levels and/or quality Physical habitat loss / damage Non-physical disturbance Loss of functionally-linked land Fragmentation Loss of bird sightlines	Yes This policy is similar to Policy 9 but permits the regeneration of sites beyond the town centre and central area, for housing and mixed use development. Residential development could increase the demand for greenspace for recreation, traffic (air pollution), and water demand / discharge. Depending on the location of the sites, there is also the potential for physical habitat loss / damage; the loss of functionally-linked land or fragmentation (if on or near greenspace/waterbodies); or non-physical disturbance (noise / light), pet predation or loss of bird sightlines if the sites are close to a European site.
Policy 13: Residential and other residential-led allocation (3,838 new homes at 51 allocated sites – see Appendix D)	Residential and mixed-use development Changes in population Changes in vehicle traffic Changes to water demand and discharge	Recreation pressure Pet predation Air pollution Changes to water levels and/or quality Physical habitat loss / damage Non-physical disturbance Loss of functionally-linked land Fragmentation Loss of bird sightlines	Yes This policy permits housing and associated mixed use development at 51 allocated sites. Some of those sites also have site-specific development policies (Policies 39-46); however the number of homes they are allocated for is assessed under this policy. Residential development could increase the demand for greenspace for recreation, traffic (air pollution), and water demand / discharge. Depending on the location of the sites, there is also the potential for physical habitat loss / damage; the loss of functionally-linked land or fragmentation (if on or near greenspace/waterbodies); or non-physical disturbance (noise / light), pet predation or loss of bird sightlines if the sites are close to a European site.

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Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
Policy 14: Type and mix of housing	None – this policy sets out the preferred housing mix but will not itself result in new development.	None	No
Policy 15: Delivering houses in multiple occupation	Changes in population Changes in vehicle traffic Changes to water demand and discharge	Recreation pressure Pet predation Air pollution Changes to water levels and/or quality	Yes This policy permits dwellings to be converted into houses of multiple occupancy and therefore increases the occupation density of residences in the town. Although likely to be small-scale, the increase in population could contribute to an increase in the demand for greenspace for recreation, traffic (air pollution), and water demand / discharge. Depending on the location of the properties, there is also the potential for increase in pet predation, if close to a European site.
[Policy 16 deleted in Main Modifications]			
Policy 17: Safeguarding existing employment sites	Non-employment development Changes in vehicle traffic Changes to water demand and discharge	Air pollution Changes to water levels and/or quality Non-physical disturbance Loss of functionally-linked land Fragmentation	Yes This policy safeguards existing employment sites but permits changes of use to non-employment uses if employment use is no longer viable. If the development significantly alters the number of vehicle trips to the site or the mix of uses at the site, it could increase traffic (air pollution) and water demand / discharge. Depending on the location of the sites, there is also the potential for the loss of functionally-linked land or fragmentation (if on or near greenspace/waterbodies); or non-physical disturbance (noise / light) if the sites are close to a European site
Policy 17A: Employment Allocations	Employment development Changes in population Changes in vehicle traffic Changes to water demand and discharge	Air pollution Changes to water levels and/or quality Physical habitat loss / damage Non-physical disturbance Loss of functionally-linked land Fragmentation Loss of bird sightlines	Yes This policy permits employment development at 10 allocated sites. Some of those sites also have site-specific development policies (e.g. Policy 44); however the quantum of employment development they are allocated for is assessed under this policy. Employment development could increase traffic (air pollution), and water demand / discharge. Depending on the location of the sites, there is also the potential for physical habitat loss / damage; the loss of functionally-linked land or fragmentation (if on or near greenspace/waterbodies); or non-physical disturbance (noise / light), or loss of bird sightlines if the sites are close to a European site.
Policy 18: Supporting new employment developments and	Employment development	Air pollution	Yes

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Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
schemes within and outside safeguarded sites	Changes in vehicle traffic Changes to water demand and discharge	Changes to water levels and/or quality Non-physical disturbance Loss of functionally-linked land Fragmentation Loss of bird sightlines	This policy permits development at sites where employment activities would not cause harm to adjoining land uses and occupiers. If the development significantly alters the number of vehicle trips to the site or the mix of uses at the site, it could increase traffic (air pollution) and water demand / discharge. Depending on the location of the sites, there is also the potential for the loss of functionally-linked land or fragmentation (if on or near greenspace/waterbodies); or non-physical disturbance (noise / light) or loss of bird sightlines if the sites are close to a European site.
Policy 19: New retail developments and retail impact assessment [c.8,900 sqm convenience retail and c.7,300 sqm convenience]	Retail development Changes in vehicle traffic Changes to water demand and discharge	Air pollution Changes to water levels and/or quality Physical habitat loss / damage Non-physical disturbance Loss of functionally-linked land Fragmentation Loss of bird sightlines	Yes This policy permits retail development in the Primary Shopping Area, town centre, edge-of-centre sites and some out-of-centre sites. These could change the number of vehicle trips (air pollution) and alter water demand / discharge. Depending on the location of the sites, there is also the potential for physical habitat loss / damage; the loss of functionally-linked land or fragmentation (if on or near greenspace/waterbodies); or non-physical disturbance (noise / light) or loss of bird sightlines if the sites are close to a European site.
[Policy 20 deleted in Main Modifications]			
Policy 21: Residential development on upper floors	Changes in population Changes in vehicle traffic Changes to water demand and discharge	Recreation pressure Air pollution Changes to water levels and/or quality	Yes This policy permits the upper floors of shops to be converted into dwellings and therefore increases the resident population in the town centre. Although likely to be small-scale, the increase in population could contribute to an increase in the demand for greenspace for recreation, traffic (air pollution), and water demand / discharge.
Policy 22: Neighbourhood centres	None – this policy sets principles for development in proximity to neighbourhood retail, but will not itself result in new development.	None	No
Policy 23: Sports facilities and playing pitches	None – this policy safeguards existing facilities and requires contributions towards new	None	No

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Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
	facilities, but will not itself result in new development.		
Policy 24: Community facilities	Community development Changes in vehicle traffic Changes to water demand and discharge	Air pollution Changes to water levels and/or quality Physical habitat loss / damage Non-physical disturbance Loss of functionally-linked land Fragmentation Loss of bird sightlines	Yes This policy permits new or extended community facilities. Although likely to be small-scale, development could contribute to a change in the number of vehicle trips (air pollution) and water demand / discharge. Depending on the location of the sites, there is also the potential for physical habitat loss / damage; the loss of functionally-linked land or fragmentation (if on or near greenspace/waterbodies); or non-physical disturbance (noise / light) or loss of bird sightlines if the sites are close to a European site.
Policy 25: Childcare provision	None – this policy will not result in new development.	None	No
Policy 26: Sites for burial space	Extension of existing burial sites	Loss of functionally-linked land	Yes The three allocated burial sites are adjacent to existing burial sites. If any of this land is used by species from a SPA/Ramsar, then their extension could result in the loss of functionally-linked land or fragmentation. None of the three allocated sites are in areas already identified as potential FLL. The policy recognises that burial spaces can provide greenspace or ecological enhancement, which could contribute to mitigation for recreation impacts on European sites.
Policy 27: Sustaining and enhancing existing, and supporting the creation of, Northampton's green infrastructure	None – this policy will not result in new development.	None	No <i>This policy states that "All major housing and commercial developments will be expected deliver and / or contribute to green and blue infrastructure projects . Applications must be accompanied by a site-specific green and blue infrastructure strategy and / or plan to illustrate how green infrastructure is integrated within the development proposal and how it seeks to improve connectivity to the Local Level Green Infrastructure networks beyond the site boundary. In accordance with the Best Practice Principles, Aims and Objectives set out in the Northampton Green Infrastructure Plan (or subsequent updated documents), development proposals will demonstrate how they make a positive contribution to the projects identified within the nine Green Infrastructure Components and associated projects contained in the Northampton Green Infrastructure Plan."</i> This could provide mitigation for recreation impacts on European sites.

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Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
Policy 28: Providing open spaces	None – this policy will not result in new development.	None	<p>No</p> <p>This policy sets standards for greenspace provision, including 1.57ha of natural and semi-natural green space per 1,000 population, within a 720m walk. It also states that all major developments will be required to contribute to open space provision as per the standards.</p> <p>The policy also states that: "Suitable Alternative Natural Greenspaces (SANGS) are existing areas of open land which are improved to attract residents of new developments away from designated sites such as Special Protection Areas and Special Areas of Conservation. SANGS need to be suitably designed for recreation, accessible and usually provide circular footpaths. As set out in Policy 28, the provision of a SANG may meet or contribute to the provision of other types of open space."</p> <p>This could provide mitigation for recreation impacts on European sites.</p>
Policy 29A: Supporting and enhancing biodiversity	None – this policy will not result in new development.	None	<p>No</p> <p>This policy states that: <i>"A. The Council will require all development proposals to provide a net gain in biodiversity through the creation or enhancement of habitats by: i. Incorporating and enhancing existing biodiversity features on and/or off site; ii. Consolidating, developing and enhancing functionality of ecological networks including those beyond the Local Plan's boundary; and iii. Managing, monitoring and maintaining biodiversity within a development.</i></p> <p><i>B. Proposals should enhance natural capital and be designed around the existing components of the ecological network including sites of national or international importance, sites of local importance and other biodiversity assets.</i></p> <p><i>C. All applicants are expected to assess the impacts of their proposals on biodiversity, including indirect impacts such as recreational activities. Applicants should have regard to the Northamptonshire Biodiversity Action Plan and the latest guidance on biodiversity net gain when developing proposals. The Council requires applicants to use a recognised biodiversity calculator such as the DEFRA metric.</i></p> <p><i>D. Development that does not achieve biodiversity net gain, and fragments habitats and links will be refused."</i></p> <p>This provides general protection for biodiversity.</p>
Policy 29B: Nature conservation	None – this policy will not result in new development.	None	<p>No</p> <p>This policy states that: <i>"A. The Council requires development to protect, maintain and enhance biodiversity and geodiversity. All proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment. If harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for, planning permission will be refused.</i></p>

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Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
			<p>B. Proposals should have regard to principles set out in the Northamptonshire Biodiversity SPD or successor document and where necessary undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards to inform development.</p> <p>C. The Council will seek the protection or enhancement of the ecological network in proportion to the site's designation status, the contribution it makes to the ecological network and take account of considerations set out below:</p> <ul style="list-style-type: none"> I. Sites of national or international importance - Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest are of international and/or national importance and development affecting them will be expected to avoid causing adverse effects. II. Sites of local importance - Development affecting Northampton's Local Nature Reserves, Local Wildlife Sites, Local Geological Sites and Potential Wildlife Sites will be expected to avoid causing adverse effects on these assets unless it can be demonstrated that the benefits of development clearly outweigh the harm. III. Other biodiversity assets - Development affecting sites that are not formally designated, but which make a positive contribution to biodiversity, will be required to take into account their current or potential role in Northampton's wider biodiversity network." <p>This policy provides general protection of the SPA/Ramsar sites.</p>
Policy 30: Upper Nene Valley Gravel Pits Special Protection Area	None – this policy will not result in new development	None	<p>No</p> <p>This policy states that "Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.</p> <p>Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the UNVGP SPA Supplementary Planning Document. Applications comprising a new gain in residential units within 3km of the Upper Nene Valley Gravel Pits SPA will, in combination, have an adverse effect on the integrity of the SPA if not mitigated.</p> <p>The Local Planning Authority has adopted a mitigation strategy for Unit 1 of the Upper Nene Valley Gravel Pits SPA which must be referred to when preparing an application that is located within 3km of Unit 1 of the SPA. Residential development will be required to pay a Strategic Access Management and Monitoring (SAMM) contribution and / or provide bespoke mitigation such as a Suitable Alternative Natural Greenspace (SANG) in order to mitigate recreational impact.</p> <p>Other adverse effects could include the loss or fragmentation of functionally-linked land, non-physical disturbance (noise, vibration or light), and impacts due to water runoff. Sites that could potentially be</p>

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Scoping matrix

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Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
			<p><i>functionally linked land associated with the SPA will need to undertake overwintering bird surveys early in the planning process ahead of submitting an application.</i></p> <p><i>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.</i></p> <p><i>In order to protect sightlines for birds included within the Upper Nene Gravel Pits Special Protection Area, new development within a 250m zone of the Special Protection Area shown on the proposals map must undertake an assessment to demonstrate that it will not have a significant adverse effect on birds within the area or, if directly adjacent to existing buildings, should reflect surrounding building heights."</i></p> <p>This provides specific protection of the Upper Nene Valley Gravel Pits SPA and ensures avoidance / mitigation of effects relating to recreation pressure, pet predation, physical habitat loss or damage, loss/fragmentation of functionally linked land, non-physical disturbance, changes to water supply/quality, and changes to bird sightlines.</p>
Policy 31: Protection and enhancements of designated and non-designated heritage assets	None – this policy will not result in new development.	None	No
Policy 32: Designing sustainable transport and travel	Sustainable transport infrastructure	None	<p>No</p> <p>This policy sets out the requirement for developments to reduce the requirement for car use by providing infrastructure and high quality design that encourages public transport use, walking and cycling.</p> <p>This could provide mitigation for air pollution impacts on European sites.</p>
Policy 33: Highway network and safety	None – this policy will not result in new development.	None	<p>No</p> <p>This policy requires developments to have no adverse impacts on the local and/or strategic transport network that cannot be mitigated; and requires major developments applications to be accompanied by a Transport Assessment.</p> <p>This could contribute to mitigation for air pollution impacts on European sites.</p>
Policy 34: Transport schemes and mitigation	None – this policy sets out the requirement for developer contributions to transport schemes and council safeguarding of land	None	<p>No</p> <p>This policy states that "Proposals for schemes which are likely to cause pollution or likely to result in exposure to sources of pollution or risks to safety will need to demonstrate that they provide opportunities</p>

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Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
	for transport, but will not itself result in new development.		to minimise and where possible reduce pollution issues that are a barrier to achieving sustainable development and healthy communities", which could contribute to mitigation for air pollution impacts.
Policy 35: Parking standards	None – this policy will not result in new development.	None	No
Policy 36: Electronic communication networks	Electronic communications development	None	No
Policy 37: Infrastructure delivery and contributions	None – this policy sets out the requirement for developer contributions to new infrastructure, but will not itself result in new development.	None	No
[Policy 38 deleted in Main Modifications]			
Policy 39: Northampton Railway Station (LAA0288), Railfreight and adjoining sites (LAA0333) (468 homes, see Policy 13; mixed uses, see Policy 17A)	None – this policy sets design principles for the development of the site but will not itself result in new development (beyond that allocated in Policies 13 and 9).	n/a	No The quantum of development brought forward at this mixed use development is assessed under Policy 13 (new homes) and Policy 17A (employment). The policy also requires proposals to "provide details of how the accessible natural greenspace is to be provided at the northern end of the site. New development will also need to provide a contribution towards providing a woodland stepping stone (a connected habitat) to the north of the site." which could contribute towards mitigating recreation pressure at the SPA/Ramsar, although the site is beyond the 3km radius in which mitigation needs to be provided.
Policy 40: Martin's Yard Extension (LAA1005)	None – this policy sets design principles for the development of the site but will not itself result in new development (beyond that allocated in Policy 17A).	n/a	No The quantum of development brought forward at this employment development is assessed under Policy 17A.
Policy 41: The Green, Great Houghton (LAA1098)	Residential development	Loss of functionally-linked land Recreation pressure	Yes The quantum of development brought forward at this site and the location of the allocated site LAA1098 are assessed under Policy 13 (ie including its associated effects on recreation pressure, loss of FLL, air pollution, water supply, pet predation and non-physical disturbance). However, this large residential site is

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Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
(c.800 homes, of which a minimum of 225 will be provided during the Plan period, see Policy 13)			<p>close to the SPA/Ramsar and the design principles set out in this policy will affect the scale of any effects on FLL or recreation pressure.</p> <p>The policy includes the following criteria that need to be met, that could contribute to mitigation for the effects of development at the site: "Winter surveys are undertaken to identify whether the site is used by over-wintering Golden Plover or Lapwing and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat.", "Development must adhere to Policy 30 of this Plan, in particular with reference to recreational disturbance and functionally linked land associated with the Upper Nene Valley Gravel Pits Special Protection Area.", "A Suitable Alternative Natural Greenspace (SANG) will be secured".</p> <p>Proposals must be informed by a masterplan for the whole allocation which will be expected to: "d. Connect the site to nearby Brackmills Country Park and surrounding areas including pedestrian and cycling provision to secure connectivity and permeability within the site, to the employment area to the north, the proposed residential areas to the west along The Green and to Great Houghton"; and</p> <p>"e. Provide a SANG within the area identified in Figure 20 [northern part of sites] which provides the following: i. Protection, enhancement and / or creation of habitats in line with other policies of this plan. ii. Accessibility for residents' recreation including an off-lead dog walking area. iii. A circular walking route around the SANG and eastern development area. iv. A clear separation between the developed site and the village of Great Houghton in order to protect its setting and the heritage assets of the village. v. Formal and informal open space. vi. A SANG car park, vii. If any part of the SANG is proposed off-site, the SANG will need to be adjoining the site."</p>
Policy 42: Greyfriars (LAA113) (400 homes, see Policy 13; mixed uses, see Policy 17A)	None – this policy sets design principles for the development of the site but will not itself result in new development (beyond that allocated in Policies 13 and permitted by Policy 17A).	n/a	<p>No</p> <p>The quantum of development brought forward at this housing-led development is assessed under Policy 13 (new homes) and Policy 17A (employment).</p>
Policy 43: Ransome Road (LAA1139) (c.500 homes, assessed under Policy 13)	None – this policy sets design principles for the development of the site but will not itself result in new development (beyond that allocated in Policy 13).	n/a	<p>No</p> <p>The quantum of development brought forward at this housing-led development is assessed under Policy 13.</p>

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Policy	Activities likely to result as a consequence of the policy	Potential effects if policy implemented	Does the policy need to be scoped into the Appropriate Assessment?
Policy 44: Sites in Tanner Street, Green Street, St Peter's Way and Freeschool Street (LAA0167 / 0818 / 0931 / 1010) (c.5 homes, see Policy 13)	None – this policy defines principles for the protection of heritage assets at these sites but will not itself result in new development (beyond that allocated in Policy 17A).	n/a	No The quantum of development brought forward at these employment sites (Sites 0818, 0167 and 0931) is assessed under Policy 17A. This policy does not permit development at Site 1010.
Policy 45: Hunsbury Farm Rise, Hunsbury Hill (LAA1100) (c.80 homes, assessed under Policy 13)	None – this policy sets design principles for the development of the site but will not itself result in new development (beyond that allocated in Policy 13).	n/a	No The quantum of development brought forward at this housing-led development is assessed under Policy 13.
Policy 46: Abington Mill (LAA1107) (c.125 homes, assessed under Policy 13)	None – this policy sets design principles for the development of the site but will not itself result in new development (beyond that allocated in Policy 13).	n/a	No The quantum of development brought forward at this housing-led development is assessed under Policy 13.

Appendix D

Allocated sites assessed in the HRA

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Allocated sites assessed in the HRA

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Table D.1: Allocated sites assessed in the HRA

Site reference	Site name	Residential	Employment	Burial
LAA0167	Tanner Street		•	
LAA0171	Quinton Road	•		
LAA0174	Ransome Road Gateway	•		
LAA0193	Former Lings Upper School, Birds Hill Walk	•		
LAA0204	The Farm, Hardingstone	•		
LAA0288	Northampton Railway Station car park	•	•	
LAA0333	Northampton Railway Station (Railfreight)	•		
LAA0335	Chronicle & Echo North	•		
LAA0338	Countess Road	•		
LAA0594	Sixfields East		•	
LAA0598	Car park, Victoria Street		•	
LAA0615	Crow Lane North		•	
LAA0629	British Timken	•		
LAA0685	Adj. 12 Pennycress Road	•		
LAA0719	Car garage workshops, 409 Harlestone Road	•		
LAA0767	46 Spencer Street	•		
LAA0818	St Peter's Way		•	
LAA0870	Sixfields, Upton Way		•	
LAA0903	Hawkins Shoe Factory, Overstone Road	•		
LAA0910	379 Harlestone Road	•		
LAA0931	Sites in Green Street		•	
LAA0932	Southbridge Site 1	•		
LAA0933	Southbridge Site 2	•		
LAA1005	Land north of Martins Yard, Spencer Bridge Road		•	
LAA1006	Pineham	•		
LAA1007	Land south of Wooldale Road, east of Wootton Road	•		
LAA1010	Land at St Peter's Way/ Court Road/ Freeschool Street	•		
LAA1013	University of Northampton, Park Campus	•		
LAA1014	University of Northampton, Avenue Campus	•		
LAA1022	Belgrave House	•		

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Site reference	Site name	Residential	Employment	Burial
LAA1025	Land to the west of Towester Road	•		
LAA1026	Eastern Land parcel, Buckton Fields	•		
LAA1036	Derwent Drive garage site, Kings Heath	•		
LAA1048	Stenson Street	•		
LAA1049	Land off Arbour Court	•		
LAA1052	Land rear of garages in Coverack Close	•		
LAA1071	Medway Drive (rear of Medway Close)	•		
LAA1086a	Two parcels of land in Sunnyside Estate (Cosgrove Road)	•		
LAA1086b	Two parcels of land in Sunnyside Estate (Chalcombe Avenue)	•		
LAA1096	Land off Mill Lane	•		
LAA1098	The Green, Great Houghton	•		
LAA1100	Hill Farm Rise	•		
LAA1101	Land at Waterside Way		•	
LAA1102	Site east of Towcester Road	•		
LAA1104	Watering Lane	•		
LAA1107	Former Abington Mill Farm, land off Rushmere Road	•		
LAA1108	Former Dairy Crest Depot, Horsley Road	•		
LAA1109	Mill Lane	•		
LAA1112	Milton Ham		•	
LAA1113	Greyfriars	•	•	
LAA1114	Cedarwood Nursing Home, 492 Kettering Road	•		
LAA1117	133 Queens Park Terrace	•		
LAA1123	83 - 103 Trinity Avenue	•		
LAA1124	41-43 Derngate]	•		
LAA1126	5 Primrose Hill	•		
LAA1131	The Leys Close, 39 Mill Lane	•		
LAA1133	Eastern District Social Club, Crestwood Road	•		
LAA1134	St John's Railway Embankment	•		
LAA1137	Land at Wootton Fields	•		
LAA1139	Ransome Road	•		
LAA1140	Land north of Milton Ham	•		

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Site reference	Site name	Residential	Employment	Burial
26A	Kingsthorpe Cemetery			•
26B	Harlestone Road, Dallington			•
26C	Towcester Road Cemetery			•

Appendix E

Record of consultation

A record of Regulation 19 consultation responses and subsequent discussions, and how those have been addressed.

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Record of consultation

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Reg.19 (round 1) consultation responses

Table E.1: Record of consultation (Reg19 round 1)

Consultee	Consultation	Comments	Response
Natural England ⁷⁰	Regulation 19 consultation(round 1) 11 June 2019 (commenting on April 2019 version of HRA)	NE welcomes the submission of a HRA further to the draft NE reviewed on 18 August 2017 (our reference 221246). Overall, the Appropriate Assessment concludes that the Northampton Local Plan Part 2 will not result in adverse effects on the integrity of Rutland Water SPA and Ramsar site or Upper Nene Valley Gravel Pits SPA and Ramsar site. However, in some cases, further mitigation or safeguards are required to enable this conclusion to be reached. NE's principle concern is the potential for developments that could adversely affect the integrity of Unit 1 of the Nene Valley Gravel Pits via impacts of recreational disturbance and loss of Functionality Linked Land. We note that the plan puts forward up to 2,315 new homes on 24 sites within 3km of the SPA/ Ramsar. Therefore, until suitable protection has been afforded to Unit 1, and a suitable mitigation strategy has been agreed between Natural England and your Council to help protect Unit 1 from recreational pressure, we cannot support the HRA conclusions.	A meeting was held with Natural England (NE) and Northampton Borough Council (NBC; now West Northamptonshire Council) on 17 October 2019 – see below – to agree suitable revisions to the wording of policies within the Local Plan Part 2. Policy 29 (previously 25) and Policy 30 (previously 26) were updated to strengthen the overarching protection for the Upper Nene Valley SPA/Ramsar, and make specific reference to recreational pressure and FLL: Policy 29: <i>"The Upper Nene Valley Gravel Pits is designated a Special Protection Area, a Ramsar site and a Site of Special Scientific Interest. Development, whether individually or in combination, having an adverse effect on the integrity of the Upper Nene Valley Gravel Pits will be refused. All proposals must comply with Policy 30"; and</i> <i>"All applicants are expected to assess the impacts of their proposals on biodiversity, including indirect impacts such as recreational activities, the cumulative impact of developments and any potential effects on functionally linked land to the respective site. Applicants will be required to undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards. These will be required to support and inform development proposals that would affect sites for nature conservation, protected species, or species and habitats of principal importance demonstrating development will deliver a net gain. "</i> Policy 30: <i>"Proposals must ensure that there is no adverse impact either alone or cumulatively on the Upper Nene Valley Gravel Pits SPA and Ramsar site.</i> <i>Applications comprising a net gain in residential units within 3 km of the Upper Nene Valley Gravel Pits SPA will need to demonstrate that the impact of any increased recreational activity or pet predation (indirect or direct) on the SPA will not have a detrimental impact.</i>

⁷⁰ Natural England's Regulation 19 responses are comment reference 170: <https://www.northampton.gov.uk/downloads/file/11393/ps1-170-natural-england-001-redacted>

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Consultee	Consultation	Comments	Response
			<p><i>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 water runoff, water abstraction or discharges from the foul drainage system either as a direct result of the development alone or in combination." .</i></p> <p>The commitment to develop a recreation mitigation strategy was embedded in the supporting text for Policy 30:</p> <p><i>"A mitigation strategy will be prepared for the Upper Nene Valley Gravel Pits SPA with a view to its subsequent adoption as an addendum to the SPD. It will advise applicants and ensure that development (standalone and cumulative) does not impact negatively on this biodiversity asset. This document will be produced within 12 months of the adoption of the Northampton Local Plan Part 2. However, the broad principles and a draft of the mitigation strategy agreed with Natural England will be prepared prior to the adoption of the local plan."</i></p> <p>The HRA report has been updated to reflect these changes.</p>
		Within our previous comments (our reference 221246), we note that the two proposed allocations sites at/ near Great Houghton Independent School (LAA1024 and LAA1011) were of concern to NE. We are pleased to see that these sites do not appear to be included in Appendix A of the draft Plan Trajectory for sites allocated in the Local Plan Part 2.	No response required.
		We would like to provide clarification on the difference between FLL and supporting habitat. FLL is habitat outside of the SPA boundary that supports its designated features; whereas supporting habitat by definition is situated within an SPA boundary, and the SPA designated features rely on its presence. FLL may be argued a type of supporting habitat. We are pleased that 1.19 of the HRA states that the potential for offsite impacts, such as through impacts to functionally linked land...has also been fully considered in this HRA. From this point in the HRA we understand that FLL is described as supporting habitat.	The updated report made the distinction clearer and uses FLL to refer to habitat outside the SPA/Ramsar boundary
		We noted within our 18 August 2017 response that if sites are located on optimal supporting habitat, then there should be a policy requirement for winter bird surveys to be undertaken before any allocation progresses. If birds associated with the Upper Nene Valley SPA are found to be using these sites in significant numbers then	The full quote from the April 2019 HRA (para 5.26) is:

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Consultee	Consultation	Comments	Response
		<p>the allocations should be located elsewhere, or appropriate mitigation will be required, and secured within the plan policy and Part 2 plan HRA. We would like to reiterate this advice. Neither the HRA or the draft Plan offers requirements to safeguard wintering birds associated with the SPA and this is clearly acknowledged in the HRA within section 5.26: "None of the policies within the Local Plan provide specific mitigation for the loss of supporting habitat". Consequently, we would like to reiterate our previous advice that specific policy safeguards for loss of FLL is required.</p>	<p>"None of the policies within the Local Plan provide specific mitigation for the loss of supporting habitat. However, Policy BN4 Upper Nene Valley Gravel Pits Special Protection Area, within the West Northamptonshire Joint Core Strategy, provides specific protection from the loss of supporting habitat: New development will need to demonstrate through the development management process that there will be no significant adverse effects upon the integrity of the Special Protection Area and Ramsar site and the species for which the land is designated including the loss of supporting habitat...either as a direct result of the development alone or in combination."</p> <p>Following the meeting with NE and NBC, Policy 29 (previously 25) was updated to include a requirement to consider FLL and undertake surveys:</p> <p>"All applicants are expected to assess the impacts of their proposals on biodiversity, including indirect impacts such as recreational activities, the cumulative impact of developments and any potential effects on functionally linked land to the respective site. Applicants will be required to undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards. These will be required to support and inform development proposals that would affect sites for nature conservation, protected species, or species and habitats of principal importance demonstrating development will deliver a net gain."</p> <p>Policy 41 (previously 36) was also updated to include the requirement that:</p> <p>"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, off site mitigation will be required for the loss of habitat ie functionally linked land." and</p> <p>"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. Appropriate types of habitat and accessibility are to be determined following surveys for Special Protection Area birds."</p> <p>The HRA report was updated to reflect these changes.</p>

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Consultee	Consultation	Comments	Response
		<p>The Green, Great Houghton</p> <p>The HRA states that it is unlikely that the site provides unique features that cannot be found at other areas of habitat nearby, and more suitable habitat (eg surrounded by other fields, or pasture) may be found elsewhere. Although more suitable FLL may be found elsewhere, we expect appropriate overwintering birds surveys to demonstrate its significance, and therefore uniqueness with respect to the HRA. We agree that the requirements for these surveys need to be written into Policy 36</p> <p>It is also stated that Appropriate mitigation would involve the enhancement of another area of habitat, a similar distance from the SPA/Ramsar and of the same area of greater, such that sub-optimal/ unsuitable habitat becomes optimal for Golden Plover or lapwing, to ensure that the overall quality and availability of feeding resources for these species is maintained. The vast proportion of FLL suitable for Golden Plover or lapwing is situated within arable farmland, which is already in situ. For information, the golden plover foraging range is 15 – 20 km, but with a reduced sensitivity beyond 10km from the SPA. We agree that requirements for mitigation should be written into Policy 36.</p>	<p>Following the meeting with NE, NE clarified that "<i>The key point within NE Reg. 19 comments is that securing suitable mitigation for loss of FLL is not straightforward. The foraging range for plover is large. The 2010 Environ study for the WNJCS, shows a heat map for plover, this is the type of information which could be updated.</i>"</p> <p>NE subsequently agreed the revised wording of Policies 29 (previously 25) and 41 (previously 36), as above, which set out the requirement to consider FLL at all development sites and carry out surveys, and specific requirements for survey and mitigation at The Green, Great Houghton.</p> <p>The HRA report was updated to reflect these changes, both in relation to The Green, Great Houghton and other development sites in locations that have not already been identified as having optimum habitat for Golden Plover / Lapwing.</p>
		<p>The most important point, and one which is missed from the HRA entirely, is the impact from the proposed 800 dwellings on the Northampton Washlands through recreational pressure.</p>	<p>The quantum of housing provided by allocated residential sites was assessed in relation to Policy 13, including the c.800 homes allocated at The Green, Great Houghton.</p> <p>This HRA report has been updated to acknowledge that recreational pressure (and FLL) is a key issue relating to Policy 41 (previously 36), given its scale and proximity to the SPA/Ramsar.</p>
		<p>The outlines for The Green at Great Houghton shows an area of ecological enhancement; it is unclear whether this space would constitute biodiversity net ecological enhancement, a SANG, or whether it is used by golden plover or lapwing. This distinction is important. At this stage, it is clear that the impact of this site would need to be considered in conjunction with plans for the potential SUE adjacent and west of this development.</p>	<p>LUC acknowledges that the specific use of the area of ecological enhancement will make a difference to the degree of recreational pressure arising in relation to this site, and that the potential for in-combination effects with the potential SUE need to be drawn out in the assessment.</p> <p>As above, the following text was added to Policy 41 (previously 36):</p> <p>"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. Appropriate type of habitats and accessibility are to be determined following surveys for SPA birds "</p> <p>The HRA report was updated to reflect these changes.</p>

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Consultee	Consultation	Comments	Response
		<p>Fragmentation is a separate but related issue to loss of functionally linked land (see the SPA SPD) and it requires its own policy protection.</p>	<p>Agreed, although fragmentation within the SPA/Ramsar has been scoped out of the HRA as development within the SPA/Ramsar would not be permitted. It is therefore only fragmentation of FLL that could occur.</p> <p>Following the meeting with NE and NBC, Policy 30 (previously 26) was re-written to include:</p> <p><i>"Proposals must ensure that there is no adverse impact either alone or cumulatively on the Upper Nene Valley Gravel Pits SPA and Ramsar site." and "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 water runoff, water abstraction or discharges from the foul drainage system either as a direct result of the development alone or in combination."</i></p> <p>Policy 29 was also updated to improve the protection of the SPA/Ramsar:</p> <p><i>"The Upper Nene Valley Gravel Pits is designated a Special Protection Area, a Ramsar site and a Site of Special Scientific Interest. Development, whether individually or in combination, having an adverse effect on the integrity of the Upper Nene Valley Gravel Pits will be refused. All proposals must comply with Policy 30" and "All applicants are expected to assess the impacts of their proposals on biodiversity, including indirect impacts such as recreational activities, the cumulative impact of developments and any potential effects on functionally linked land to the respective site. Applicants will be required to undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards."</i></p> <p>The HRA report was updated to reflect these changes.</p>
		<p>Although the disturbance from noise, vibration and lighting from allocation sites on the SPA seems to be scoped out, the impacts of unallocated development on the SPA have unknown impacts. To remove this uncertainty please refer to our comment from 18 August 2017, where we state that for sites in close proximity to the SPA, such as LAA1107 Land off Rushmere Road, consideration should be given to phasing the construction period, whereby the most intensive/ noisy part of development avoids the sensitive winter season (1st October – 31st March inclusive). NE advise that the SPA is protected from such disturbances within the winter season through Plan policy.</p>	<p>Construction timing/phasing is standard avoidance mitigation that needs to be triggered at the project level.</p> <p>Following a meeting with NE and NBC, Policy 30 (previously 26) was updated to include:</p> <p><i>"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 water runoff, water abstraction or discharges from the foul drainage system either as a direct result of the development alone or in combination."</i></p> <p>The supporting text for Policy 30 was also updated to include the following:</p>

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Consultee	Consultation	Comments	Response
			<p><i>"...for sites in close proximity to the SPA, consideration should be given to phasing the construction period, whereby the most intensive/noisy part of development avoids the sensitive winter season (1st October – 31st March inclusive)."</i></p> <p>The HRA report was updated to reflect these changes.</p>
		<p>Our previous advice on Water Supply & 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 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 consultation) and confirmed that no significant water treatment issues were anticipated.</p> <p>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 Plan⁷¹, suggesting that a requirement for water efficiency standards should be incorporated into policy wording; no further concerns were raised.</p> <p>Policy 5 was then updated to include a requirement for efficiency standards of 110l per person per day in new residential development. The HRA was updated to reflect that change.</p>
		<p>Within 5.160 of the HRA it is stated that Policies within the Local Plan and Joint Core Strategy provide sufficient safeguards against this potential effect. NE would like to advise amendments to Policy 26 of the draft plan, strengthening the protection for bird sightlines to act in addition to BN4 in the WNJCS.</p>	<p>The conclusions of the April 2019 HRA recommended that Policy 26 (now 30) is updated to broaden its coverage to include other types of effect than solely 'disturbance'.</p> <p>Following a meeting with NE and NBC, Policy 30 (previously 26) was re-written to specifically refer to bird sightlines:</p> <p>"UPPER NENE VALLEY GRAVEL PITS SPECIAL PROTECTION AREA</p> <p><i>Proposals must ensure that there is no adverse impact either alone or cumulatively on the Upper Nene Valley Gravel Pits SPA and Ramsar site.</i></p> <p><i>Applications comprising a net gain in residential units within 3 km of the Upper Nene Valley Gravel Pits SPA will need to demonstrate that the impact of any increased recreational activity or pet predation (indirect or direct) on the SPA will not have a detrimental impact.</i></p> <p><i>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 water runoff, water abstraction or discharges from the foul drainage system either as a direct result of the development alone or in combination.</i></p>

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			<p><i>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.</i></p> <p><i>In order to protect sightlines for birds included within the Upper Nene Valley Gravel Pits Special Protection Area, new development within a 250m zone of the Special Protection Area shown on the policies map must undertake an assessment to demonstrate that it will not have a significant adverse effect on birds within the area or, if directly adjacent to existing buildings, should reflect surrounding building heights."</i></p> <p>The HRA report was updated to reflect these changes.</p>
		<p>Recreational disturbance is the key threat to Unit 1 of the UNVGP SPA. We note that the HRA outlines the need for a mitigation strategy, and in line with our Regulation 18 advice (10 June 2016, our reference 184406) we advise this is made prior to adoption of the Plan.</p> <p>The HRA states that Plans policies provide sufficient mitigation to prevent individual developments from having a significant effect on the SPA/Ramsar, but do not necessarily address the potential combined effects of the Local Plan's total housing provision (within 3km of the SPA/ Ramsar) or the in-combination effects with other development plans. Further, 5.85 goes on to say that a more strategic approach – for example, a mitigation strategy that can be applied to all residential developments within 3 km of the SPA/ Ramsar –would provide sufficient certainty that the effects of recreational disturbance can be mitigated, rather than placing the onus solely on individual developments to identify appropriate mitigation. NE agree that adopting a more strategic approach to mitigation is essential to protecting the SPA from additional development that could come forward through the Plan, and will work with your authority to establish this prior to adoption of this Plan.</p> <p>Specifically, a strategic approach is essential to mitigate for recreational pressure at Unit 1 of the SPA. Within our response dated 18 August 2017 we state that the Local Plan and its HRA will need to set out the approach to mitigation and include a policy commitment to the prompt development of a full mitigation strategy. NE would welcome early discussions with your authority on the scope of the strategy, and would like to arrange a meeting with you in the near future. NE again welcome a meeting to discuss the development of a new mitigation strategy for the Northampton</p>	<p>Following the meeting with NE and NBC, the wording of Policy 30 (previously 26) was updated to include the following:</p> <p><i>"Proposals must ensure that there is no adverse impact either alone or cumulatively on the Upper Nene Valley Gravel Pits SPA and Ramsar site.</i></p> <p><i>Applications comprising a net gain in residential units within 3 km of the Upper Nene Valley Gravel Pits SPA will need to demonstrate that the impact of any increased recreational activity or pet predation (indirect or direct) on the SPA will not have a detrimental impact."</i></p> <p>A commitment to preparing a mitigation strategy was also embedded within the supporting text for Policy 30:</p> <p><i>"A mitigation strategy will be prepared for the Upper Nene Valley Gravel Pits SPA with a view to its subsequent adoption as an addendum to the SPD. It will advise applicants and ensure that development (standalone and cumulative) does not impact negatively on this biodiversity asset. This document will be produced within 12 months of the adoption of the Northampton Local Plan Part 2. However, the broad principles and a draft of the mitigation strategy agreed with Natural England will be prepared prior to the adoption of the local plan.</i></p> <p><i>Since the adoption of the WNJCS, Natural England has continued to monitor visitor pressure on the SPA. Evidence shows 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. With the amount of potential development being progressed within the vicinity, Northampton Borough Council will prepare an appropriate mitigation strategy to prevent additional pressure and disturbance to the birds. The strategy will draw on evidence of existing recreational impact and forecast additional impact from proposed residential growth, it will then identify suitable mitigation measures such as access management and monitoring to minimise impact on the SPA. Without mitigation, any increase in the number of residential units near the SPA has the potential to increase the significance of the effect by increasing the number of visits to the designated site.</i></p> <p><i>Mitigation may involve:</i></p>

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		Washlands, and agree that the wording of similar text for Local Plan Policy 26 (or a separate policy) and a mitigation strategy will need to be agreed with NE. As stated above, this should be done prior to the adoption of the local plan.	<ul style="list-style-type: none"> ■ <i>Development of and implementation of habitat and access management plans within the SPA</i> ■ <i>Improvement of existing greenspace and recreational routes</i> ■ <i>Provision of suitable alternative natural greenspace and recreational routes</i> ■ <i>Monitoring of the impacts of new development on the SPA to inform the necessary mitigation requirements and future refinement of any mitigation measures"</i> <p>The HRA report was updated to reflect these changes.</p>
		NE are unsure how pet predation is prevented by the local plan policies. However, we would like your Council to be aware that dogs (on or off leads) or people, that stray off the embankment are the outstanding threat to SPA species at Unit 1, and any mechanisms to enforce this would be the single most effective way of protecting this section of the SPA.	<p>Disturbance by dogs and pet predation are similar but separate issues. Pet predation is more often by cats; disturbance by dogs has been considered in relation to recreation pressure (ie dog walking). Policy 30 (previously 26) was updated to include the following:</p> <p><i>"Applications comprising a net gain in residential units within 3 km of the Upper Nene Valley Gravel Pits SPA will need to demonstrate that the impact of any increased recreational activity or pet predation (indirect or direct) on the SPA will not have a detrimental impact."</i></p> <p>The HRA report was updated to reflect these changes.</p>
The Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire ⁷²	Regulation 19 consultation(round 1) 13 June 2019 (commenting on April 2019 version of HRA)	The Upper Nene Valley Gravel Pits SPA and Ramsar Site has been internationally recognised for its importance to non-breeding waterbirds. Pressure from recreation is one of the biggest threats to the SPA as it can disturb the birds reducing their feeding efficiency. Northampton includes part of the Clifford Hill Gravel Pits/Northampton Washlands section of the SPA along with land functionally linked to it. Due to their location, the Northampton Washlands are already suffering from a high level of recreational disturbance; a point raised in the West Northamptonshire Joint Core Strategy Local Plan (Part 1) in paragraphs 10.26 and 10.27 and within the Habitats Regulations Assessment (HRA) which accompanies this Local Plan (Part 2). It is, therefore, of great concern to us that Policy 26 is weak and not consistent with the HRA or the requirements of the international designation. In our view it would be ineffective in providing protection for the SPA, particularly when the cumulative impacts of developments are considered. The HRA provided additional text for inclusion within the policy which included greater clarity regarding mitigation measures and the need to create a strategic mitigation strategy for the Northampton	<p>The April 2019 HRA report was based on the Regulation 19 submission version of the Local Plan (rather than the other way around); therefore, recommendations made in the April 2019 HRA report have been reflected in subsequent amendments to policy wording.</p> <p>As stated above, policies protection for the SPA/Ramsar was strengthened in Policies 29 and 30 (previously 25 & 26), both generally and with specific reference to recreation pressures, FLL and the need for surveys. A commitment to preparing a recreation strategy was also incorporated into the supporting text for Policy 30. Policy 41 (The Green, Great Houghton) also required detailed bird surveys and a design response that mitigates any potential effects on FLL or from recreation pressure.</p> <p>The HRA report was updated to reflect these changes.</p>

⁷²The Wildlife Trust's Regulation 19 responses are comment reference 185: <https://www.northampton.gov.uk/downloads/file/11357/ps1-185-wildlife-trust-bcn-001-redacted>

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		<p>Washlands, agreed with Natural England, prior to the adoption of the Local Plan. The HRA clearly states that without these measures the Local Plan (Part 2) could have adverse effects on the integrity of the SPA. These findings from the HRA have not been incorporated into the Local Plan (Part 2) which shows a disregard for the SPA and results in the Plan being not sound or legally compliant.</p> <p>The mitigation hierarchy contained within the National Planning Policy Framework (NPPF) paragraph 175 has avoidance as the first step. It should not be assumed that mitigation for all schemes will be possible. Any proposal within the SPA, or on land functionally linked to it, should be avoided as a first step. Mitigation measures should only be used as a second step and then only when designed using up-to-date survey information and in accordance with the Mitigation Strategy for the Northampton Washlands which has not been prepared. We would advise that these deficiencies need to be resolved before the Plan is adopted, otherwise the Plan will not be compliant with European legislation, and the domestic legislation derived from it.</p>	
		<p>This allocation [Site 1098 The Green, Great Houghton] is specifically mentioned in the Habitat Regulations Assessment (HRA). The HRA clearly states that the allocation has the potential to cause harm to the Upper Nene Valley Gravel Pits Special Protected Area (SPA) through increased recreational pressure on the Northampton Washlands and through the development of land functionally linked to the SPA. The Northampton Washlands are already being degraded by excessive recreational pressure, particularly from dogs disturbing the birds for which the SPA was identified. There is no mitigation plan in place to tackle the existing problems and therefore allocating further housing development in the area is not appropriate. The HRA requested 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. Given how clearly this is stated in the HRA is it very surprising that Policy 36 does not mention the SPA or the need for additional survey work. It is also not included in the entry for this site in the Site Allocation Methodology and Land Availability Assessment. The area suggested for ecological enhancement within the proposal 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. This</p>	<p>As stated above, a commitment to preparing a recreation strategy was incorporated into the supporting text for Policy 30. Policy 41 (The Green, Great Houghton) also required detailed bird surveys and a design response. (including appropriate design of the ecological buffer) that mitigates any potential effects on FLL or from recreation pressure.</p> <p>The HRA report was updated to reflect these changes.</p>

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		would make it unsuitable for SPA mitigation. The importance and reasons for the designation of the SPA have not been reflected by this policy. It is not in line with the HRA, and therefore inconsistent with European legislation and the domestic legislation derived from it, nor with Policy 26 of this Local Plan (Part 2). We object to this allocation and recommend that it is removed from the document.	
Natural England	Meeting with LUC, NE and NBC 17 October 2019	<p>A meeting was held to discuss LUC's suggested amendments to policy wording (identified in the April 2019 to provide mitigation for potential effects) and NE's consultation response to the first round of Regulation 19 consultation.</p> <p>Attendees discussed and agreed changes to the wording of policies 25, 26, and 36 (now 29, 30 and 41) and their supporting text.</p> <p>In relation to the recreation mitigation strategy, it was agreed that agreement and adoption of the mitigation strategy within 12 months of the adoption of the Local Plan Part 2 would be acceptable providing that the broad principles and a draft of the strategy were agreed with NE prior to the adoption of the Local Plan Part 2.</p> <p>It was agreed that it would be sensible for NBC and South Northamptonshire Council to work together to produce the mitigation strategy, using North Northamptonshire Council's strategy as an example.</p>	Policies 29, 30 and 41 were re-written, as above. The HRA was updated to reflect these changes.

Reg.19 (round 2) consultation responses

Table E.2: Record of consultation (Reg19 round 2)

Consultee	Consultation	Comments	NBC officer response	Responses
Northamptonshire County Council Ecologist North	Regulation 19 consultation (round 2)	"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	<p>It is agreed that a minor modification, removing the reference to pet predation, will clarify the policy.</p> <p>Amend Policy 30 to remove wording in []:</p> <p>Applications comprising a net gain in residential units within 3 km of the Upper Nene Valley Gravel Pits SPA</p>	The Upper Nene Valley supports Golden Plover, which relies of open arable and pasture for foraging habitat. This is typically very open to avoid risk of predation. Gadwall and Bittern rely on lakes, marshes, reedbeds, estuarine habitats, which are types of habitat where cat predation is less likely. The approach taken in the HRA is precautionary.

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Consultee	Consultation	Comments	NBC officer response	Responses
Northants & West Northants Councils)	July-September 2020 (referring to the June 2020 HRA)	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."	and Ramsar site will need to demonstrate that the impact of any increased recreational activity [or pet predation] (indirect or direct) on the SPA and Ramsar site will not have a detrimental impact.	<p>It would therefore be useful if Natural England could clarify their position as to whether they think that domestic cats are a threat to the over-wintering bird population at the Upper Nene Valley Gravel Pits SPA. If they feel that there is no significant threat, we would need to revise the HRA.</p> <p>However, if NE consider that there is a significant threat, and they have said (in the SoCG) that there is no way to mitigate cat predation, then the only way of avoiding adverse effects on integrity would be to refuse planning permission (for residential developments within 1.5km, where there is no physical barrier such as a main road or watercourse between the site and the SPA/Ramsar). Policy 29 enables residential developments within 3km to be refused planning permission if they would have adverse effects on the integrity of the SPA/Ramsar.</p> <p>Either way, the inclusion of 'pet predation' in Policy 30 is not required.</p>
Anglian Water	Regulation 19 consultation (round 2) July-September 2020 (referring to the June 2020 HRA)	"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. 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).	<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 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</p>	<p>Agreed that this would provide clearer mitigation, without altering the findings of the HRA.</p> <p>We have assumed that in the following paragraph in Anglian Water's comments, the word 'requiring' is a typo that should not be there: "We also have concerns about requiring major development proposals located within close proximity to Upper Nene Valley SPA in relation to foul drainage."</p>

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Consultee	Consultation	Comments	NBC officer response	Responses
		<p>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 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>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>	
Natural England		The policy states "...major development within close proximity of the SPA..." All projects and plans within close proximity	Agreed. Suggested addition to Policy 30 in brackets() and removal of wording in brackets []:	Agreed that the proposed changes to Policy 30 would clarify the requirements of the Habitats Regulations.

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	Regulation 19 consultation (round 2) July-September 2020 (referring to the June 2020 HRA)	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.	Proposals for (all) [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 (in accordance with the Habitats Regulations and the Upper Nene Valley Gravel Pits Supplementary Planning Document).	
		The policy wording quoted within the HRA is not reiterated within the Northampton Borough Council 2011-2029 Proposed Submission – Round 2, June 2020 document. 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.	To mitigate potential effects on 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.	No response required
		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.	Natural England's response to the LPP2 Draft Submission Round 1 consultation dated 11.06.19 stated: Our previous advice on Water Supply & 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.	It is recommended that similar wording is added to Policy 41 (The Green, Great Houghton), including the requirement for project level HRA, as suggested by Natural England. It appears from the NBC officer response that this is not currently proposed as a modification. The officer response refers to a previous suggestion by Natural England that any allocated sites that Anglian Water identify potential water supply/treatment issues with be subject to project level HRA; the requirement for this was resolved as Anglian Water identified no issues with the allocated sites. Natural England is requesting that development at The Green requires project level HRA due to its scale and

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Consultee	Consultation	Comments	NBC officer response	Responses
			<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 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 Plan, 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>	<p>proximity to the SPA. As the details of the proposed ecological buffer will make a difference to the effects of the development on the SPA, it is appropriate that project level HRA is undertaken.</p> <p>We assume that Natural England does not support the conclusion of no adverse effects on the integrity of the Upper Nene Valley Gravel Pits SPA until a mitigation strategy has been agreed, as per their round 1 comments ("Therefore, until suitable protection has been afforded to Unit 1, and a suitable mitigation strategy has been agreed between Natural England and your Council to help protect Unit 1 from recreational pressure, we cannot support the HRA conclusions."). We note that the mitigation strategy is in preparation with Natural England.</p>

Statements of Common Ground (SoCGs)

SoCGs that have been agreed through discussion with Natural England, following the Reg.19 (Round 2) consultation responses. Note that Northampton is now part of West Northamptonshire Council, which is progressing the Northampton Local Plan preparation. Deleted text is shown ~~struck through~~; additional text is shown underlined.

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Table E.3: Record of consultation (SoCGs)

Consultee	Consultation	Comment that SoCG responds to	Changes to policy wording agreed in the SoCG	Responses
Statement of Common Ground between: West Northamptonshire Council, Homes England and Natural England				
Relating to: Policy 41 and Natural Environment Matters				
Natural England	Policy 41 SoCG August 2021	NE requires a detailed project level HRA to address the impacts of site allocation LAA1098 on the Upper Nene Valley Gravel Pits SPA. NE note that Policy 41 wording does not reference the Habitats Regulations and that, in its current state, Policy 30 does not refer to the HRA process.	Policy 30 is now proposed to be amended through a Main Modification to include the requirement for an HRA where development is likely to have a significant effect on the UNVGP SPA.	Agreed
		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. NE note that no details have been provided regarding where or how the off-site mitigation would be achieved.	"Any requirement for potential functionally linked land to be mitigated, as a result of bird survey findings, will need to be identified by the developer of the land and discussed with Natural England and West Northamptonshire Council."	Agreed
		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).	The Council has committed to the production of a mitigation strategy for the UNVGP by the time the LPP2 is adopted through Policy 30. This is proposed via a Main Modification to Policy 30. The LPA agrees that a SANG will be delivered through the proposed allocation at The Green, Great Houghton (Policy 41 – site LAA1098). As such a Main Modification is proposed which is detailed below.	Agreed – see below

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Consultee	Consultation	Comment that SoCG responds to	Changes to policy wording agreed in the SoCG	Responses
		Natural England consider that, as part of a strategy to mitigate the adverse impact of development on the UNVGP SPA, site LAA1098 (Policy 41) should provide a Suitable Alternative Natural Greenspace (SANG) as part of the development. This would offer an alternative area for the population of the development to recreate and avoid further recreational disturbance to the UNVGP SPA.	<p>It is agreed that the provision of a SANG is required to help mitigate development proposed within Policy 41 to avoid adverse impact on the UNVGP SPA. West Northamptonshire Council therefore proposes to seek a Main Modification to Policy 41 to include the following wording:</p> <p>"A Suitable Area of Natural Greenspace (SANG) will be secured to provide an area for residents to use and, in particular, provide dog walkers with the provision of a substantial "off-lead" area and a sufficient circular route. There will be flexibility in the delivery of the SANG as part of the development either on-site, off-site or through a combination of on-site and off-site delivery. If any of the SANG is proposed off-site, the SANG will need to be adjoining the development site."</p> <p>The Council attended a meeting with Homes England and Natural England on 25 March 2021 to discuss the specifications of the SANG including design and phasing, as well as other matters such as biodiversity net gain and green infrastructure associated with site LAA1098. Communication is ongoing with regards to exact requirements and Natural England have provided advice to Homes England on SANG specifications. The SANG should fully mitigate adverse impact on the Upper Nene Valley Gravel Pits SPA. Should this not be the case then a Strategic Access Management and Monitoring (SAMM) contribution will be required.</p>	It is important that Natural England are providing advice on SANG specifications, to avoid disturbance at the SPA or functionally linked land.
Homes England	Policy 41 SoCG	HE stated that in advance of detailed technical assessment, the location and extent of ecological	The following changes to Policy 41 and its supporting text are proposed as Main Modifications:	Agreed

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Consultee	Consultation	Comment that SoCG responds to	Changes to policy wording agreed in the SoCG	Responses
	August 2021	<p>enhancement and the exact location of built development cannot be determined – specification of location and extent restricts flexibility in taking the site forward. As such Policy 41 is currently too prescriptive and suggest changes including the following:</p> <p>Housing development of up to <u>approximately</u> 800 dwellings, <u>subject to analysis of capacity</u>, which comply with the development principles shown on Figure 20 will be supported, <u>following further technical assessment and subject to</u> the following criteria being met:</p> <ul style="list-style-type: none"> - 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, <u>appropriate mitigation offsite mitigation</u> will be required for the loss of habitat i.e. functionally linked land - 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. - Any development on this site must adhere to Policy 30 of this Plan, in particular with reference to recreational disturbance. - The built development should only take place outside of the <u>indicative area shaded green</u> in the diagram <u>subject to the confirmation of this area's</u> 	<p>Bullet point 1:</p> <p>If significant numbers of Golden Plover or Lapwing are identified at the site, <u>offsite appropriate mitigation</u> will be required for the loss of habitat i.e. functionally linked land</p> <p>Bullet point 7:</p> <p>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 <u>that separates the allocated site from Great Houghton, and Great Houghton from Brackmills Industrial Estate</u></p> <p>It is also proposed to amend paragraph 13.12 to include the following:</p> <p><u>It is therefore important to ensure that there is a reasonable buffer created between this existing village and the new development on The Green to ensure that the setting of the conservation area and its heritage asset can be respected and protected, and the identity of the village maintained. There will also be an opportunity to provide semi natural stepping stones (connected habitats) adjacent to and within the site that will provide habitat links.</u></p>	

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Consultee	Consultation	Comment that SoCG responds to	Changes to policy wording agreed in the SoCG	Responses
		<u>suitability for ecological enhancement to act as a buffer</u>		
		HE considered that the key within Fig 20 (within Policy 41) should read 'Ecological enhancement (indicative)'	It is considered that the proposed alterations to the supporting text at para 13.12, as detailed above, set out the reasons for the ecological buffer in that location.	It is not clear from the text whether the ecological buffer is in addition to the SANG or not (should be in addition, subject to advice from Natural England).
		HE considered the trajectory for The Green, Great Houghton should be modified due to the further technical work needed. The first year of completions 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 2 years then up to 100 dwellings completed per annum with two sales outlets.	The Proposed Schedule of Main Modifications to the Plan proposes an update to the trajectory to reflect HE's comments.	Noted
Northamptonshire County Council Ecologist	Policy 41 SoCG August 2021	Second bullet point in policy could be moved to supporting text. Seventh bullet point needs to clarify what is to be buffered	The 2nd bullet point of Policy 41 has been moved to the supporting text. The 7th bullet point of Policy 41 has been amended to clarify the buffers role.	Noted
Statement of Common Ground between: West Northamptonshire Council and Natural England				
Relating to: Policies 27, 28 29, 30 and 34				
Natural England	Policies 27, 28 29, 30 and 34 SoCG August 2021	Policy 29: Recommend a separate point within Policy 29 to address biodiversity net gain. Include reference to DEFRA biodiversity metric.	POLICY 29—Supporting and Enhancing Biodiversity 1. 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	LUC agrees with the principles of the changes. However, the revised wording of Policy 30 seems to put emphasis on developers contacting Natural England to find out if their development is likely to

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Consultee	Consultation	Comment that SoCG responds to	Changes to policy wording agreed in the SoCG	Responses
		<p>The policy clearly needs to distinguish between the mitigation hierarchy and the biodiversity net gain requirements.</p> <p>Recommend the mitigation hierarchy is detailed within Policy 29</p> <p>Recommend Policy 29 directs developers to the Northamptonshire Biodiversity SPD</p> <p>The policy does not reflect the wording referred to within the HRA, June 2020 report: "Development, whether individually or in combination, having an adverse effect on the integrity of the Upper Nene Valley Gravel Pits (UNVGP) will be refused". NE would welcome this wording within Policy 29 and Policy 30</p> <p>Policy 30:</p> <p>Policy 30 should commit to a Mitigation Strategy for the Upper Nene Valley Gravel Pits SPA and the strategy must be agreed prior to adoption of the plan.</p> <p>Policy 30 states <i>major</i> development within close proximity of the SPA. It should state <i>all</i> development in close proximity of the SPA.</p> <p>Policy 30 does not reference the Habitats Regulations or the HRA process.</p> <p>There is no reference in Policy 30 to the Upper Nene Valley Gravel Pits SPA SPD.</p>	<p>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>2. In particular, the Council will seek the protection or enhancement of ecological network in line with their status as set out below:</p> <ul style="list-style-type: none"> - Sites of national or international importance The Upper Nene Valley Gravel Pits is designated a Special Protection Area, a Ramsar site and a Site of Special Scientific Interest. All proposals must comply with Policy 30. - Sites of local importance Development affecting the Borough's Local Nature Reserves and Local Wildlife Sites will be expected to avoid causing adverse effects unless it can be demonstrated that the benefits of development clearly outweigh the harm. - Undesignated sites Development affecting sites that are not formally designated, but which make a positive contribution to biodiversity, will be required to take into account their current or potential role in the Borough's wider biodiversity network. 	<p>have an impact on the SPA. Could be re-worded to put emphasis on the SPD in the first instance.</p>

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Consultee	Consultation	Comment that SoCG responds to	Changes to policy wording agreed in the SoCG	Responses
		<p>Policy 30 should refer to alone or in combination terminology to avoid confusion with EIA terminology (cumulative).</p> <p>Policy 30 refers to 'detrimental impact on the integrity of the UNVGP SPA'. It should avoid subjective wording and use instead: 'adverse impact on the integrity of the UNVGP SPA'.</p> <p>Policy 30 contains unnecessary wording: and species for which the land is designated'.</p> <p>Policy 30 references 'close proximity of the SPA'. NE assume that 'close proximity' means '3km'.</p> <p>Policy 30 uses the terminology 'supporting habitat' but the terminology 'functionally linked land' is more appropriate.</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).</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>3. All applicants are expected to assess the impacts of their proposals on biodiversity, including indirect impacts such as recreational activities, the cumulative impact of developments and any potential effects on functionally linked land to the respective site. Applicants will be required to undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards. These will be required to support and inform development proposals that would affect sites for nature conservation, protected species, or species and habitats of principal importance demonstrating development will deliver a net gain.</p> <p>POLICY 29a – Supporting and Enhancing Biodiversity</p> <p>1. The Council will require all major development proposals to provide a net gain in biodiversity through the creation or enhancement of habitats by:</p> <ul style="list-style-type: none"> • Incorporating and enhancing existing biodiversity features on and/or off site; • Consolidating, developing and enhancing functionality of ecological networks including those beyond the Local Plan's boundary; and • Managing, monitoring and maintaining biodiversity within a development. <p>2. Proposals should enhance natural capital and be designed around the existing components of the ecological network including sites of national or</p>	

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Consultee	Consultation	Comment that SoCG responds to	Changes to policy wording agreed in the SoCG	Responses
Northamptonshire County Council Ecologist	Policies 27, 28, 29, 30 and 34 SoCG August 2021	<p>Policy 29:</p> <p>Wording is not consistent with paragraph 175 of NPPF in relation to mitigation hierarchy.</p> <p>Include reference to DEFRA biodiversity metric.</p> <p>Policy 29 should include reference to Potential Wildlife Sites and Local Geological Sites.</p> <p>The term 'undesignated sites' should be altered to 'other biodiversity assets.'</p> <p>Policy 29 refers to cumulative impacts which can only be considered when development is subject to Environmental Impact Assessment (EIA).</p> <p>Policy 29 refers to functionally linked land which is specific to the Upper Nene Valley Gravel Pits and not general biodiversity.</p> <p>The Policy should note applicants are expected to consult the Northamptonshire Biodiversity SPD to find out whether and what surveys might need to be undertaken.</p> <p>Policy 30:</p> <p>Policy 30 should include a commitment to preparing a Mitigation Strategy for the SPA.</p> <p>Unlike recreational disturbance from off-lead dogs, pet predation cannot be controlled.</p> <p>Therefore, inclusion in Policy 30 is questioned.</p>	<p>international importance, sites of local importance and other biodiversity assets.</p> <p>3. All applicants are expected to assess the impacts of their proposals on biodiversity, including indirect impacts such as recreational activities. Applicants should refer to the Northamptonshire Biodiversity Action Plan and the latest guidance on biodiversity net gain when developing proposals. The Council requires applicants to use a recognised biodiversity calculator such as the DEFRA metric.</p> <p>4. Development that does not achieve biodiversity net gain, and fragments habitats and links will be refused.</p> <p>Policy 29b – Nature Conservation</p> <p>1. The Council requires development to protect, maintain and enhance biodiversity and geodiversity. All proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment. If harm to biodiversity cannot be avoided, adequately mitigated, or, as a last resort, compensated for, planning permission will be refused.</p> <p>2. Proposals should comply with principles set out in the Northamptonshire Biodiversity SPD or successor document and where necessary undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards to inform development.</p>	

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Consultee	Consultation	Comment that SoCG responds to	Changes to policy wording agreed in the SoCG	Responses
		<p>The significant effects listed in the third paragraph of Policy 30 should be moved to supporting text.</p> <p>Policy 38:</p> <p>Concerns were raised over the inclusion of site LAA0657 (Fraser Road) within Policy 38 and the site assessment form which states the site is not in proximity to any designated biodiversity or geodiversity site. NoE highlighted that the site is adjacent to a Potential Wildlife Site (PWS) and within 1km of another PWS and a Local Wildlife Site.</p>	<p>3. The Council will seek the protection or enhancement of the ecological network in proportion to the site's designation status, the contribution it makes to the ecological network and take account of considerations set out below:</p> <ul style="list-style-type: none">• Sites of national or international importance <p>Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest are of international and/or national importance and development affecting them will be expected to avoid causing adverse effects. All proposals will be expected to avoid causing adverse impacts to the Upper Nene Valley Gravel Pits and must comply with Policy 30.</p> <ul style="list-style-type: none">• Sites of local importance <p>Development affecting Northampton's Local Nature Reserves, Local Wildlife Sites, Local Geological Sites and Potential Wildlife Sites will be expected to avoid causing adverse effects on these assets unless it can be demonstrated that the benefits of development clearly outweigh the harm.</p> <ul style="list-style-type: none">• Other biodiversity assets <p>Development affecting sites that are not formally designated, but which make a positive contribution to biodiversity, will be required to take into account their current or potential role in the Borough's wider biodiversity network.</p> <p>SUPPORTING TEXT:</p> <p>a. Paragraph 10.17 is proposed to be changed via a Main Modification (green text): - This document will be <u>adopted</u></p>	

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Consultee	Consultation	Comment that SoCG responds to	Changes to policy wording agreed in the SoCG	Responses
			<p><u>by produced within 12 months of the adoption of the time of the adoption of</u> the Northampton Local Plan Part 2.</p> <p>b. Paragraph 10.18 is proposed to be changed via a Main Modification (green text): - The strategy will draw on evidence of existing recreational impact and forecast additional impact from proposed residential growth, it will then identify suitable mitigation measures such as access management and monitoring to minimise impact on the SPA. Without mitigation, any increase in the number of residential units <u>within 3km of the SPA will have an adverse effect on the integrity of the Upper Nene Valley Gravel Pits SPA, near the SPA has the potential to increase the significance of the effect by increasing the number of visits to the designated site.</u></p> <p>c. The following bullet point within Paragraph 10.19 is proposed to be removed via an Additional Modification: - <u>Monitoring of the impacts of new development on the SPA to inform the necessary mitigation requirements and future refinement of any mitigation measures</u></p> <p>d. Paragraph 10.20 is proposed to be changed via a Main Modification: - Other significant adverse effects such as loss or fragmentation of habitats and change to water quality can also arise from development. <u>In addition, there could be impacts on areas of functionally linked land which support the bird species (golden plover and lapwing) for which the Upper Nene Valley Gravel Pits Special Protection Area has been designated.</u> As such developers should engage early with Natural England regarding their proposals. For example, for sites in close proximity to the SPA, consideration should be given to</p>	

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			<p>phasing the construction period, whereby the most intensive/ noisy part of development avoids the sensitive winter season (1st October – 31st March inclusive).</p> <p><u>POLICY 30 UPPER NENE VALLEY GRAVEL PITS SPECIAL PROTECTION AREA</u></p> <p>Proposals must ensure that there is no adverse impact either alone or cumulatively on the Upper Nene Valley Gravel Pits SPA and Ramsar site.</p> <p>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) on the SPA and Ramsar site will not have a detrimental impact.</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 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>	

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Consultee	Consultation	Comment that SoCG responds to	Changes to policy wording agreed in the SoCG	Responses
			<p>In order to protect sightlines for birds included within the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar site, new development within a 250m zone of the Special Protection Area and Ramsar site shown on the policies map must undertake an assessment to demonstrate that it will not have a significant adverse effect on birds within the area or, if directly adjacent to existing buildings, should reflect surrounding building heights.</p> <p>POLICY 30 – Upper Nene Valley Gravel Pits Special Protection Area</p> <p>Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area (UNVGP SPA) must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.</p> <p>Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which may include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also refer to the Upper Nene Valley Gravel Pits SPA Supplementary Planning Document.</p> <p>Applications comprising a net gain in residential units within 3 km of the Upper Nene Valley Gravel Pits SPA</p>	

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Consultee	Consultation	Comment that SoCG responds to	Changes to policy wording agreed in the SoCG	Responses
			<p>and Ramsar site will, in combination, have an adverse effect on the integrity of the SPA if not mitigated.</p> <p>The Local Planning Authority will prepare a Mitigation Strategy document concerning the Upper Nene Valley Gravel Pits Special Protection Area which is to be adopted as an Addendum to the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document by the time this Local Plan is adopted.</p> <p>Other adverse effects could include the loss or fragmentation of functionally linked land, non-physical disturbance (noise, vibration or light), and impacts due to water runoff. Sites that could potentially be functionally linked land associated with the SPA will need to undertake overwintering bird surveys early in the planning process.</p> <p>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>In order to protect sightlines for birds included within the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar site, new development within a 250m zone of the Special Protection Area and Ramsar site shown on the policies map must undertake an assessment to demonstrate that it will not have a significant adverse effect on birds within the area or, if directly adjacent to existing buildings, should reflect surrounding building heights.</p>	

Examination and main modifications

Issues raised at Examination and other discussions that have led to the main modifications.

Table E.4: Record of consultation (Examination and main modifications)

Consultee	Consultation	Comment	Response
Planning Inspectors ⁷³ & Natural England	Post-hearings letter summarising issues outstanding from the Examination; 24 January 2022	<p>Planning Inspectors:</p> <p>2. Overall, we consider that, subject to the satisfactory resolution of matters relating to the Habitats Regulations discussed below, and MMs, the Plan is likely to be capable of being found legally compliant and sound. We will set out our reasoning for this in our final report.</p> <p>...</p> <p>6. In our letter dated 17 March 2021 (EXAM-1), we posed a number of initial questions and highlighted our concerns regarding the approach of the Plan in respect of the Upper Nene Valley Gravel Pits SPA (the SPA), and the findings of the Habitats Regulations Assessment (HRA). Our concerns echo those of Natural England as set out in their representations to the Plan.</p> <p>7. Whilst we appreciate the ongoing efforts that have been made since we issued our initial letter, at this point in time, we are not able to agree with the conclusions of the HRA as submitted, namely that there would be no adverse effects on the integrity of the SPA. As set out in our letter and as discussed in the hearings, there are two dimensions to these concerns; recreational disturbance, and the effects on any functionally linked land (FLL).</p> <p>Recreational disturbance</p> <p>8. The HRA acknowledges that access by people and dogs, both on and off public rights of way, is a significant cause of disturbance in some areas of the SPA, and evidence that visitor pressure arises principally from people living within 3 kilometres of the surveyed access points. The evidence before us includes that there has been a 76% decline in Golden</p>	<p>Recreational disturbance</p> <p>The mitigation strategy⁷⁴ for recreation pressure, which forms an addendum to the Upper Nene Valley Gravel Pits Special Protection Area (SPA) Supplementary Planning Document (SPD), was adopted⁷⁵ on 16 March 2022, following consultation.</p> <p>The consultation responses⁷⁶ confirm that Natural England was broadly supportive of the mitigation strategy, but they requested revisions to the strategy. In response, the following revisions were incorporated by the Council:</p> <ul style="list-style-type: none"> ■ Paragraph 11 (now 12) to include: "In line with the National Planning Policy Framework, if harm to the SPA cannot be avoided or adequately mitigated then planning permission will be refused." ■ Removed reference to 'exceptional circumstances' ■ Paragraph 13 (now 15) to be amended to include the following wording: "Other large scale developments may need project level HRAs and/or bespoke mitigation such as SANGs" ■ Amend paragraph 26 and merge with paragraph 29 (now 30): "Making the SAMM contribution will remove the need for developments to mitigate against recreational pressure, and speed up the process of approval from Natural England. This would in turn, speed up the determination of these applications. However, some housing schemes, when accounting for their scale, relationship to the SPA or their potential effects (for example changes to bird sightlines, nonphysical disturbance or pet predation) may need to provide bespoke mitigation

⁷³ Post Hearings letter:<https://www.northampton.gov.uk/downloads/file/12963/exam-40-inspectors-post-hearings-letter-24012022>

⁷⁴ Recreation mitigation strategy: <https://www.northampton.gov.uk/downloads/file/12918/unvgp-spa-spd-addendum-mitigation-strategy-march-2022>

⁷⁵ Adoption statement: <https://www.northampton.gov.uk/downloads/file/12977/unvgp-spa-spd-addendum-adoption-statement>

⁷⁶ Consultation responses for mitigation strategy: <https://www.northampton.gov.uk/downloads/file/12978/unvgp-spa-spd-addendum-summary-of-responses-and-actions>

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		<p>Plover (one of the sites qualifying species) since baseline, a trend which does not match that for the region, or Britain.</p> <p>9. Policy 13 of the submitted Plan allocates land for around 2,310 new dwellings on 22 sites within 3 kilometres of Unit 1 of the SPA. In addition, there is the potential for in-combination effects with other development in the area. The Appropriate Assessment concludes that mitigation measures are required to address the issue of recreational disturbance. This has not been disputed.</p> <p>10. It is common ground between the Council and Natural England that a mitigation strategy is required to avoid adverse effects arising from the Plan on the SPA from recreational disturbance. However, it remains at this time that there is no mitigation strategy to protect the integrity of the SPA in place.</p> <p>11. The Planning Practice Guidance (PPG) states that 'Any measures used to inform the decision about the effects on the integrity need to be sufficiently secured and likely to work in practice'. The Council explained at the hearings 3 that it is preparing a mitigation strategy, in consultation with Natural England, and that it would be adopted as a Supplementary Planning Document (SPD). The draft Mitigation Strategy is presently subject to consultation, undertaken as a separate process to our examination of the Plan.</p> <p>12. It would appear that in principle, the SPD would ensure that the mitigation measures would be sufficiently secured and likely to work in practice. However, we reserve our position on this until the consultation has been concluded. We are of the view that it is necessary to have the adopted SPD in place prior to the MMs being finalised and consulted upon, as it is likely to have a bearing on the wording necessary to make the relevant parts of the Plan legally compliant and sound. Please obtain from Natural England their written confirmation as to their views on the proposed SPD and whether it changes their stated position on the Plan. Once the SPD is complete and adopted by the Council, please publish it on the Examination Website.</p> <p>Functionally linked land</p> <p>13. As discussed at the hearings there are two proposed sites for allocation for development which may provide either optimal, or sub-optimal habitat for Golden Plover and/or Lapwing and could therefore be</p>	<p>measures in addition to making the financial contribution in order to ensure effective avoidance / mitigation of impacts on the SPA. In particular, where a development will create 10 or more net additional dwellings it is advised that early dialogue with Natural England take place. Natural England will then advise the Local Planning Authority if mitigation may be dealt with through a fixed SAMM contribution of £395.34 per dwelling (index linked with a base date of 2021)</p> <p>Functionally linked land</p> <p>LAA0204: Following ecological assessment by BSG Ecology (on behalf of the site developer), LUC agrees with the survey conclusions that the site does not have the potential to be functionally linked to the SPA / Ramsar due to its proximity to housing and a footpath, which will limit its attractiveness to Golden Plover and Lapwing. Natural England's views on this are still awaited.</p> <p>LAA1098: The conclusion from the initial surveys at The Green, Great Houghton (carried out on behalf of the site developer) showed that there was no evidence that the site had a strong functional link to the SPA. Only two observations of golden plovers using the site were made, with the peak flock size (43 birds) representing a small proportion of the original SPA cited population stated at notification (0.74%) [5,790 birds at notification]. No lapwings were recorded using the site with only two observed in an adjacent off-site field, seen at the beginning of the survey period.</p> <p>Via their Discretionary Advice Service Natural England responded to the initial findings stating: Natural England's view is that the presence of over 1% Golden Plover SPA Population and presence of 300 golden plover within the close proximity of the site, indicated within the survey of 2016, demonstrates that this area can be considered as functionally linked land to the SPA. Only one year's survey is presented, therefore, there is no evidence that the area is not regularly used by golden plovers.</p> <p>The Council is awaiting the formal results of the 2nd surveys of the site but the recorded flocks in the 2nd survey are lower than that recorded in the first surveys. The survey results, and whether the site can be considered functionally linked will inform the required mitigation.</p>

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		<p>functionally linked to the SPA. These are LAA0204 The Farm, Hardingstone and LAA1098 The Green, Great Houghton.</p> <p>14. Through statements and discussions at the hearings, it has been confirmed that further work is being undertaken in respect of these sites, and wintering bird surveys are being undertaken in respect of The Green, Great Houghton.</p> <p>15. LAA0204 The Farm, Hardingstone. At the hearing we heard evidence that supported the view that this site was unlikely to involve FLL. We note that the views of Natural England on this matter are awaited. Please forward them to us in due course to assist us in determining whether/how the Plan should be amended in this regard through the preparation of MMs.</p> <p>16. LAA1098 The Green, Great Houghton. The outcome of the current wintering bird surveys is expected to be known around April 2022. If it cannot be established that the scheme would not involve FLL, we would wish to see evidence that the Mitigation Hierarchy has been applied, and how any necessary mitigation measures may be secured so that we can consider how the Plan may be modified to make it sound and legally compliant in this regard.</p> <p>Habitats Regulations conclusions</p> <p>17. We are of the view that the issues we raise concerning the HRA are capable of resolution in a timely manner, to enable us to conclude on legal compliance and soundness. Additionally, given that the work necessary to resolve these matters is well under way, this should not cause undue delay to the progress of the Plan. The outstanding matters however need to be resolved to our satisfaction prior to the completion of, and consultation on the MMs. The HRA requires to be updated and consulted upon alongside the MMs. Please confirm the likely adoption date for the SPD and when the comments from Natural England on the SPD, FLL, and the outcome of the Wintering Bird Surveys can be provided.</p>	<p>The wording of Policy 41 has also been updated as part of the main modifications.</p> <p>Policy 41 now states:</p> <p><i>"i. Winter Surveys are undertaken to identify whether the site is used by over-wintering Golden Plover / and whether it acts as functionally linked land to the Upper Nene Valley Gravel Pits Special Protection Area. If the site is found to be functionally linked land, appropriate mitigation will be required for the loss of habitat..</i></p> <p>...</p> <p>Development on this site must adhere to Policy 30 of this Plan, in particular with reference to recreational disturbance and functionally linked land associated with the Upper Nene Valley Gravel Pits Special Protection Area.</p> <p>...</p> <p>Proposals must be informed by a masterplan for the whole allocation which will be expected to:... e. Provide a SANG within the area identified in Figure 20 [northern part of site] which provides the following: i. Protection, enhancement and / or creation of habitats in line with other policies of this plan. ii. Accessibility for residents' recreation including an off-lead dog walking area. iii. A circular walking route around the SANG and eastern development area. iv. A clear separation between the developed site and the village of Great Houghton in order to protect its setting and the heritage assets of the village. v. Formal and informal open space. vi. A SANG car park, vii. If any part of the SANG is proposed off-site, the SANG will need to be adjoining the site."</p> <p>In line with the mitigation hierarchy, Policy 29B states that: "Special Protection Areas, Ramsar sites and Sites of Special Scientific Interest are of international and/or national importance and development affecting them will be expected to avoid causing adverse effects."; and Policy 30 states that: "Developments that are likely to have significant effects alone or in combination on the Upper Nene Valley Gravel Pits Special Protection Area must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoid or mitigate where impacts are identified.</p>

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			Where development is likely to have significant effects on the UNVGP SPA, a Habitats Regulations Assessment will be required, which if the proposal is likely to have a significant effect on the site's conservation objectives, will include the need for an Appropriate Assessment. For developers, early consultation with Natural England is needed regarding proposals that could affect the SPA. Applicants should also have regard to the UNVGP SPA Supplementary Planning Document."
Planning Inspectors and Anglian Water ⁷⁷	Post-hearings letter summarising issues outstanding from the Examination; January 2022 Communication between LUC, the Council and Anglian Water; March 2022	Planning Inspectors: 57. Policy 5 seeks to apply the optional water efficiency standard of 110 litres/person/day, rather than that set out in the Building Regulations of 125 litres/person/day. However, whilst there is evidence that the wider Anglian Water area is an area of serious water stress, there is not evidence to demonstrate that the plan area is experiencing serious water stress, nor that the Plan would cause that to occur. In our view there is not sufficient justification to impose the requirement on this basis. 58. We note the findings of the HRA that there will be no adverse effects on the SPA and Ramsar site as a result of changes to water supply and water level management. However, these are made on the assumption that the optional water efficiency standard is imposed. We would welcome your views on whether reverting to the Building Regulations 125 litres/person/day would lead to a different conclusion in the HRA, potentially requiring mitigation.	Following correspondence with Anglian Water, in which they confirmed that the area is under water stress, the higher water efficiency standard was retained within Policy 5.
Natural England	Post-hearings letter relating to main modifications and functionally linked land, June 2022 (confidential)	Natural England were broadly happy with the proposed main modifications relating to functionally linked land (FLL) at sites LAA0204 and LAA1098, but commented that habitat suitability can change. They also said that piecemeal loss of FLL is a concern.	In response to Natural England's comments on FLL, West Northamptonshire Council has chosen to amend the boundary of allocated site LAA0204. The main modification removes the small area within the field previously identified as 'optimal' habitat for Golden Plover and/or Lapwing, from the allocation. LAA0204 no longer falls within an area previously identified as potential functionally linked land and the HRA has been updated to reflect this. Natural England were happy with the main modifications relating to LAA1098 and no further changes were made.

⁷⁷ Record of consultation with Anglian Water: <https://www.northampton.gov.uk/download/downloads/id/12985/exam-42-email-correspondence-between-wnc-and-anglian-water-re-water-stress-areas.pdf>

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Second Addendum

West Northamptonshire - Main
Modifications Viability Addendum Report

West Northamptonshire Council



June 2022

1 Introduction

- 1.1 We have been instructed by West Northamptonshire Council (the Council) to produce a short report to identify the impact that the Proposed Schedule of Main Modifications dated May 2022 located in Appendix 1.
- 1.2 We previously reviewed the draft ‘main modifications’ for the draft Local Plan, dated 9th March 2022 within a ‘First’ Addendum report dated March 2022. This Second Addendum updates the first with the latest set of modifications.
- 1.3 This report is to be read in conjunction with our whole plan viability report which is titled: Whole Plan Viability Study, issued June 2020, referred to herein as the ‘WPV Report’. Throughout this report we will refer back to the WPV Report, which contains many of our appraisal inputs and assumptions. This report was prepared after the WPV Report. We have not been instructed to revise any inputs and assumptions, only respond to the impact of the main modifications and highlight where these impact the viability of the Plan.

2 Methodology

- 2.1 The Council has provided us with a schedule of main modifications. Each modification has been given a reference. We read each modification in the context of the draft Local Plan and identify those which will have a direct impact on viability. For those that have an impact, we have provided narrative in this report explaining how and to what extent viability is impacted.

3 Main Modifications

- 3.1 In this section we outline the main modifications that will bear a direct impact on viability.
- 3.2 A description of the main modification and our narrative response is outlined in Table 3.1.

Table 3.1 Main Modifications Viability Impact

Reference	Modification summary (change in policy requirement)	AspinallVerdi Comment
MM3	<p>All development should be well designed and of high quality, meeting urban design principles outlined in the Design Companion for Planning and Placemaking, and <u>Active Design</u>, the National Design Guide and the <u>National Model Design Code</u>.</p> <p>The Council also <i>believes</i> [our emphasis] that meeting Building for a Healthy Life criteria helps achieve urban design principles.</p> <p><u>Ensure that new streets are tree lined unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate.</u></p> <p>C. For proposals for major development, a Building for a Healthy Life assessment, (or an assessment against equivalent criteria,) should be included in the Design and Access Statement to demonstrate that the proposal is capable of achieving a Building for a Healthy Life commendation, or an equivalent standard.</p>	<p>The National Model Design Code places greater emphasis on design. Good design leads add value to places and property assets and therefore there should be no direct impact on viability.</p> <p>The Building for a Healthy Life assessment would be included in the professional fee budget within the appraisals. The policy intends for this to be included within design and access statements.</p> <p>There is an additional cost of street trees, but we consider that these can be included within the external works allowance in our appraisals. The presence of street trees also add value to the place-making and asset values.</p> <p>This provides flexibility for developers to design to the appropriate standard.</p>
MM5	Development may require Embodied Carbon in Construction calculations.	The requirement for Embodied Carbon in Construction calculations would be included in our professional fees. This is included in design and access statements.

Reference	Modification summary (change in policy requirement)	AspinallVerdi Comment
MM6	<p>The design of new developments can have an impact on the community's health and wellbeing, through the shaping of the local environment and influencing the lives of the existing and future residents. It is therefore important to ensure that major development proposals include assessments on the impacts of the schemes on the health and wellbeing of the community. One way in which this can be achieved is through a health impact assessment on major development proposals. The applicant should demonstrate how the scheme promotes the provisions outlined below, and how these would benefit existing and future residents in terms of the impacts on their health and wellbeing.</p>	<p>The requirement for developers to produce a Health Impact Assessment using the Building for a Healthy Life (BfHL) tool would be included in the professional fee budget within the appraisals.</p>
MM7	<p>In order that Health Impact Assessments are proportionate to the scale of a scheme, and hence its potential impacts with its partners, the Council has developed a Rapid Health Impact Assessment tool for assessing the likely health impacts of development proposals of up to 100 dwellings. ... Applicants for developments over 100 dwellings will need to complete a full Health Impact Assessment.</p>	<p>Any abnormal costs regarding flood risk should be accounted for within the Benchmark Land Value, as per our WPV Report.</p>
MM14	<p>On sites of more than 100 dwellings, 3% of plots to be provided as serviced plots for self and custom build.</p>	<p>The requirement to deliver 3% custom self build units does not impact devleopment viability. The Council have identified a need for this product. Developers will be able to deliver serviced plots and sell these at a value that is reflective of the costs and profit allowances required. Therefore, this policy requirement does not have an impact on development viability.</p>
	<p>Specialist and Accessible Housing requirements to include:</p>	<p>In our WPV Report we tested the following housing accessibility standards:</p>

Reference	Modification summary (change in policy requirement)	AspinallVerdi Comment
	<ul style="list-style-type: none"> • 4% of all new market dwellings should be constructed to Building Regulations M4(3) (2) (a) and • 8% of affordable dwellings, where the Council is responsible for allocating or nominating occupants, should be constructed to Building Regulations Part M4 (3) (2) (b) standards, or their successor, to enable wheelchair adaptability and accessibility. <p>Applicants will need to provide evidence when site constraints prohibit the ability to deliver the required amount of specialist housing. Constraints include sites that are vulnerable to flooding, site topography, instances where the provision of a lift to dwelling entrances is unachievable, and other circumstances which may make a site less suitable for M4(2) and/or M4(3) housing, and <i>where viability considerations would not allow for this provision</i> [our emphasis].</p>	<ul style="list-style-type: none"> • 4% of market dwellings to M4(3) (2) (a) standards, and • 8% of affordable dwellings to M4(3) (2) (a) standards.
MM28	<p>A requirement for all development proposals to provide a net gain in biodiversity.</p> <p>Development that does not achieve biodiversity net gain, and fragments habitats and links will be refused.</p>	<p>The Environment Bill sets out the legal requirement for at least 10% biodiversity net gain delivery. At the time of our WPV Report, this was not legislated for and we did not cost this requirement.</p> <p>Cost evidence for BNG is outlined below:</p> <p>Greenfield sites: £1,011 per unit</p> <p>Brownfield sites: £287 per unit</p>
MM31	<p>Deletes reference to 'provide electric vehicle charging points in accordance with the standards set out in Appendix I' because this is now covered by the Building Regulations.</p>	<p>At the time of our WPV Report, we did not cost this requirement.</p> <p>Cost evidence for EV charging points is outlined below:</p> <p>Housing: £1,000 per unit</p> <p>Flats: £10,000 per unit</p>

Source: AspinallVerdi, 2021

3.3 The sum total of the additional policy costs that we have identified as a result of the main modifications is:

- M4(3) (2) (b), 8% of affordable housing £300 per unit (for flats)
- Full 10% Biodiversity Net Gain: £1,011 per unit (greenfield)
£287 per unit (brownfield)
- Electric Vehicle Charge Points £1,000 per unit (housing)
£10,000 per unit (flats)

4 Conclusion

- 4.1 Based on the above evidence, we have reviewed the main modifications that we believe have a direct impact on development viability. The modifications result in additional costs which had not previously been included within our development appraisals.
- 4.2 In our WPV Report, thirteen of the generic residential development typologies generated a positive surplus of between £4,314 - £18,742 per unit. There were four generic residential development typologies that were unviable, all brownfield sites and three of which were purely flatted development.
- 4.3 Given the additional policy costs identified in Chapter 4, it is our opinion that these are within with viability surpluses that were identified in our WPV Report. There remain some unviable typologies scenarios, however the bulk of development is still viable when the main modifications are taken into account.
- 4.4 We trust that this short report is in a format suitable for the Council. Should you have any questions or queries, please do not hesitate to contact Ben Aspinall MRICS MRTPI, Managing Director.

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CONSULTATION & ENGAGEMENT STRATEGY
NORTHAMPTON LOCAL PLAN (PART 2)
PROPOSED MODIFICATIONS
June 2022

The Consultation and Engagement Strategy sets out the arrangements for communication and consultation with the local community and all other relevant stakeholders in respect of the Proposed Modifications Consultation. The consultation will cover the following documents:

- Proposed Main Modifications to the Plan
- Proposed Additional Modifications to the Plan
- Proposed Changes to the Policies Map

These consultation documents will be accompanied by the Sustainability Appraisal, the Habitats Regulations Assessment and the Viability Assessment (addendum).

The strategy meets statutory requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Statement of Community Involvement for Northampton.

Timing	Actions
June – July 2022	<p>Two press releases:</p> <ul style="list-style-type: none">• one just prior to the Planning Policy Committee papers being made public, week commencing 13 June 2022 and• one on the 6 July <p>Social media communications on the Council's Twitter and Facebook.</p> <p>Frequently Asked Questions for external use to be placed on the website.</p>
7 July – 18 August 2022 (During consultation)	<p>All consultation documents to be made available at the Inspection locations (the One Stop Shop at the Guildhall, all publicly owned libraries in Northampton).</p> <p>All consultation documents to be made available for review/download with on-line response facility available on the WNC website.</p> <p>Send emails or letters explaining the consultation and providing details of how to respond sent to specific consultation bodies¹, the</p>

¹ The specific consultation bodies are listed in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and relate to organisations responsible for services and utilities and infrastructure provision.

	<p>general consultation bodies², neighbouring authorities, prescribed bodies³ and other organisations and individuals as appropriate.</p> <p>Paper copies of consultation documents to be made available at Town and Parish Council offices and other community offices in Northampton where possible.</p> <p>Paper copies of consultation documents to be made available on request.</p> <p>Anyone who wishes to speak to a member of staff in person can do so by arranging an appointment, by emailing:</p> <ul style="list-style-type: none"> • planningpolicy.nbc@westnorthants.gov.uk • or by calling 0300 126 7000 (choose Planning option)
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² The general consultation bodies are also specified in Regulation 2 of the 2012 Regulations and comprise:

voluntary bodies some or all of whose activities benefit any part of the local planning authority's area bodies which represent the interests of:

- different racial, ethnic or national groups in the local authority's area
- different religious groups in the local planning authority's area
- disabled people in the local planning authority's area
- persons carrying on business in the local planning authority's area

³ The prescribed bodies are specified in Regulation 4 of the 2012 Regulations (as amended) and in the case of Northampton are:

Environment Agency, Historic England, Natural England, Civil Action Authority, Homes and Communities Agency, NHS, Office of Rail Regulation, Highways England, Northamptonshire County Council Highways, South East Midlands Local Enterprise Partnership, Northamptonshire Local Nature Partnership



WEST NORTHAMPTONSHIRE COUNCIL

PLANNING POLICY COMMITTEE

28th June 2022

Councillor Rebecca Breese, Portfolio Holder for Planning, Built Environment and Rural Affairs

Report Title	West Northamptonshire Strategic Plan: Spatial Options Consultation
Report Author	Colin Staves, Principal Spatial Planner, colin.staves@westnorthants.gov.uk

Contributors/Checkers/Approvers

West S151 (for West and joint papers)	Martin Henry	Email sent 1/6/22 no comments received
Other Director/SME	Stuart Timmiss	Email sent 1/6/22 no comments received
Legal (solicitor)	Theresa Boyd	Email recd 7/6/22 confirming no comments
Communications Lead/Head of Communications	Becky Hutson	Email recd 7/6/22 confirming no comments

List of Appendices

Appendix 1 – West Northamptonshire Strategic Plan: Spatial Options Consultation – Summary of Consultation Responses

1. Purpose of Report

1.1. To consider:

- a) the responses received West Northamptonshire Strategic Plan: Spatial Options Consultation Paper;
- b) the time period covered by the Strategic Plan in the light of the consultation responses and changing circumstances;

- c) the next steps in the preparation of the Strategic Plan.

2. Executive Summary

- 2.1 The council is preparing a new local plan, known as the West Northamptonshire Strategic Plan (WNSP), to review and replace the strategic policies in the West Northamptonshire Joint Core Strategy (JCS) (Local Plan Part 1), which was adopted in December 2014. A consultation on potential spatial options was undertaken between October and December 2021 and this report provides a summary of the responses received to the consultation. The committee is asked to consider the summary of responses set out in appendix 1 and agree that they be carefully considered in the next stage of preparing the WNSP.
- 2.2 The spatial options consultation envisaged a plan period extending up to 2050 to reflect the time period covered by the anticipated spatial framework for the Oxford-Cambridge Arc. In response to representations received and in the light of increased uncertainty regarding the production of a spatial framework for the Arc, the committee is asked to consider reducing the plan period for the WNSP to 2041.
- 2.3 It is noted that the timetable for the preparation of the WNSP needs to be updated and this is addressed by a revised Local Development Scheme which is included as a separate item on the agenda. This envisages the approval of a draft plan for public consultation by the end of the calendar year to enable completion of further technical work and further member engagement.

3. Recommendations

- 3.1 It is recommended that Planning Policy Committee:
- a) Notes the responses received to the spatial options consultation as summarised in appendix 1 and confirms that they should be fully considered in the preparation of the draft plan for public consultation.
 - b) Confirms that the end date of the plan-period to be covered by the WNSP be reduced from 2050 to 2041
 - c) Agrees the next steps in the preparation of the WNSP as set out in paras 5.15 and 5.16.

4. Reason for Recommendations

- 4.1 The development plan (or local plan) is central to the planning system with a requirement in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Each local planning authority must identify their strategic priorities and have policies to address these in their local plans. It is essential that plans are in place and up to date. The preparation of the West Northamptonshire Strategic Plan is required to ensure that the council has an up-to-date development plan. In order to progress to the next stage of plan preparation it is important that thorough consideration be given to the consultation responses received and that clarity is provided on the time period to be covered by the plan.

5. Report Background

West Northamptonshire Strategic Plan: Spatial Options Consultation

- 5.1 The West Northamptonshire Strategic Plan (WNSP) Spatial Options Consultation took place between Monday 11 October and Friday 24 December 2021. The Spatial Options Consultation document set out a proposed vision for West Northamptonshire, a series of spatial objectives to help deliver the vision, an assessment of the housing and economic needs of the area, and some potential spatial development options that could be considered meet those needs.
- 5.2 The consultation paper was supported by background documents including a sustainability appraisal, housing and economic needs assessment and a strategic land availability assessment. A further 'call for sites' exercise was also undertaken during the consultation period.
- 5.3 Consultation was undertaken in accordance with the Council's adopted Statement of Community Involvement. Notifications of the consultation were sent to everyone on the Strategic Plan consultation database which includes all Town and Parish Councils in West Northamptonshire. The consultation was promoted through news releases and via the Council's social media platforms. Copies of the consultation documents were available online via the Strategic Plan consultation website, and people were able to submit responses directly using an online questionnaire. Hard copies of consultation documents and response forms were also available at the main council offices and local libraries.
- 5.4 At the beginning of the consultation an online briefing session was held for all members of the council, which was followed by two further online briefing sessions for town and parish councils (members were also able to attend these sessions). Three virtual presentation / Q and A sessions were held which were open to members of the public, and the recordings of these sessions were made available on the consultation website. In addition to the online offer 7 exhibition/drop-in events took place in Brackley, Daventry, Deanshanger, Long Buckby, Moulton, Towcester and Wootton. In general, both the online and in-person events were well attended.

Response to the Spatial Options Consultation

- 5.5 There were a total of 1740 respondents to the Spatial Options consultation document with representations coming from a range of individuals and organisations. A further 270 responses were received to the call for sites. As such the consultation generated in excess of 2000 submissions.
- 5.6 The responses to the call for sites will be subject to a technical assessment through an update of the strategic land availability assessment. This report focuses on the responses to the spatial options consultation document. Appendix 1 sets out a summary of the of the responses received to the 31 questions included in the consultation paper. The majority of the questions in the consultation allowed respondents to answer, 'yes' or 'no' and then to provide comments to support their response. Over 11,000 individual comments were received.

- 5.7 Question 1 relating to the spatial vision attracted the highest number of responses, with 231 supporting this vision, 578 objecting and 644 individual comments. The key criticisms relate to a lack of detail and highlight the need to make the vision more specific to West Northamptonshire with measurable targets. A large number of respondents felt that the spatial options included in the consultation were not consistent with the vision.
- 5.8 In terms of other questions, the following all attracted in excess of 400 objections: question 2 relating to green and clean objectives 1- 4 (403 objections), question 7 relating to the housing and economic needs assessment (437 objections), question 25 relating to spatial option 4b – Towcester South (446 objections), question 27 relating to spatial option 5a – growth at Long Buckby (415 objections) and question 5b – growth at Milton Keynes North West / Old Stratford (473 objections).
- 5.9 In terms of supportive representations, question 8 relating to the potential to direct further development at Northampton, as the principal urban area, attracted the highest level of support with 412 respondents agreeing that that is further potential for growth at Northampton.
- 5.10 Full details of the numbers of responses received to each question and a comprehensive summary of the key issues raised in the representations are set out in appendix 1. The committee is asked to consider the summary of responses in appendix 1 and to recommend that they be fully considered in the preparation of the draft strategic plan for further public consultation.

Plan period

- 5.11 The spatial options consultation envisaged a plan period extending up to 2050. This is a longer time period than would be normally expected from local plans. The principal reason for considering a longer plan period was to be consistent with the anticipated spatial framework for the Oxford – Cambridge Arc. A number of responses to the consultation have questioned whether the longer plan period is justified in the light of increasing uncertainty regarding the Arc and the inherent problems related to planning over long time periods.
- 5.12 Since the spatial options consultation took place the context for the Arc has changed significantly. In February 2021 government published a policy paper indicating how it would develop a spatial framework for the Arc. This was followed in July 2021 by a public consultation on the priorities for the spatial framework over the period to 2050. This consultation closed on 12 October 2021 and the outcomes of the consultation have not yet been published. References to the Arc were noticeably absent from the Levelling Up White Paper published in February 2022. Whilst there have been no formal announcements it is now widely understood that government no longer intends to produce a ‘top down’ spatial framework. Whilst the local partners in the Arc are continuing to work together through the Arc leadership group that commitment currently extends until September.
- 5.13 Having regard to the representations received and in the light of the increased uncertainty regarding the Arc it would be prudent for the council to consider a reduced plan period. The National Planning Policy Framework (NPPF) indicates that strategic policies should look ahead over a minimum 15-year period from the anticipated adoption of the local plan. It is noted that North Northamptonshire Council has recently undertaken a scope and issues consultation for

their strategic plan, in which they propose a plan period extending to 2041. To assist co-operation on any cross-boundary issues that may arise it would be appropriate for West Northamptonshire to consider a similar timescale. An end date of 2041 would more than meet the minimum requirements of the NPPF of a 15-year plan period and provide flexibility for any potential delays in plan adoption.

- 5.14 A reduced plan period would have implications for the scale of growth which the strategic plan would have to make provision for. Our latest assessment of the local housing need for West Northamptonshire using the standard method as of 1 April 2022 is 2118 dwellings per annum. If this were to be applied to a plan period extending to 2041 the minimum level of housing required would be 40,242 dwellings. Our current assessment of land supply, including a windfall allowance is well in excess of 37,000, meaning that the residual requirement for the plan would be in the region of 2,500 dwellings. It should be noted that this provides the minimum starting point in determining the number of homes needed in the area, and the council may wish to consider an uplift above the minimum local housing need figure.

Next Steps

- 5.15 The next stage in the preparation of the strategic plan will be a consultation on a full draft plan which will set out the preferred options for development together with a full range of strategic policies to deliver the spatial vision and objectives. Before this stage is reached further technical assessment of the spatial options is required including a strategic transport assessment and an integrated water management study. This will take time to complete, and a revised local development scheme is included on the agenda setting out the updated timetable for the strategic plan. This anticipates approval of a draft plan for consultation by the end of the calendar year.
- 5.16 In addition to the ongoing technical work, further engagement is required with members before a draft plan is brought back to the Planning Policy Committee. A programme of structured workshops will be delivered to cover the refinement of the vision and objectives, further consideration of the spatial options to meet identified housing and economic needs and the scope of the strategic policies to be included in the plan.

6. Issues and Choices

West Northamptonshire Strategic Plan: Spatial Options Consultation

- 6.1 The preparation of the WNSP is an important priority for West Northamptonshire Council and it is essential that the council has an up-to-date development plan that identifies the strategic priorities for the area and provides a policy framework to ensure the delivery of those priorities. The recently adopted part 2 local plans covering the Daventry and South Northamptonshire areas and the emerging part 2 local plan for Northampton, will provide the Council with a set of up-to-date development management policies. However, the existing part 1 local plan (i.e., the JCS) was adopted at the end of 2014 and needs to be reviewed and updated for several reasons, including changes in national policy and to respond to new challenges and opportunities.

- 6.2 The spatial options consultation was a key stage in the process of preparing the WNSP and an important step in ensuring that the council has an up-to-date part 1 plan at the earliest opportunity. Consideration of the responses to the consultation is a key step in preparing the next stage of the plan, which will be a consultation on a full draft plan which will include preferred options and policies.
- 6.3 The consultation has provided an important opportunity for our community, statutory bodies, and other stakeholders to inform the development of the preferred spatial strategy and strategic development options at a relatively early stage in the process.
- 6.4 When the plan reaches the examination stage, the council will be expected to show that it has considered all reasonable alternatives in the development of its spatial strategy. The Spatial Options consultation helps the council to demonstrate that it has done just that.

Plan period

- 6.5 The committee could decide to keep the plan period end date as 2050, however the key justification for this extended period was the anticipated production of an Arc spatial framework by central government covering the same timescale. The likelihood of such a framework being produced by central government now appears to be remote.
- 6.6 It is appropriate therefore for the council to consider a shorter plan period, in line with that usually considered by local plans and meeting the requirements of the NPPF. A shorter plan period means that the council can have greater confidence in the evidence base which will underpin the plan and provide greater certainty for our communities and other stakeholders.
- 6.7 The revised Local Development Scheme which appears on this agenda anticipates that the plan would be adopted in early 2025. An end date for the plan of 2041 would meet the requirement of the NPPF for a minimum of 15 years post adoption and build in some flexibility for any delays in the timetable.

Next Steps

- 6.8 Due to their volume, the consideration of responses to the spatial options consultation has taken longer than originally anticipated. It is important that momentum on the preparation of the plan is maintained, but it is also important that thorough consideration is given to the responses received and that there is further engagement with members before the next stage of consultation. Further technical work is also required to support the identification of the preferred options.

7. Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 It is anticipated that the further consideration of the issues raised in the spatial options consultation and the technical work required to support the preparation of the draft plan can all

be met from existing resources. Further consideration of the budget required to deliver the strategic plan may be required in future years.

7.2 Legal

- 7.2.1 The strategic plan will form part of the statutory development plan for West Northamptonshire and as such it is being prepared in accordance with the provisions of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.

7.3 Risk

- 7.3.1 Failure to prepare an up-to-date development plan for the area would mean that the council runs the risk of not being able to effectively manage development in its area, and to secure benefits associated with such development such as contributions to infrastructure. There would be an increased risk of speculative applications and planning by appeal.

7.4 Consultation

- 7.4.1 A comprehensive consultation strategy was developed with support from the consultation and engagement team which met the requirements of the council's adopted statement of community involvement. A similar strategy, with potential improvements, will be developed to support consultation on a draft plan in due course.

7.5 Consideration by Overview and Scrutiny

- 7.5.1 Not applicable.

7.6 Climate Impact

- 7.6.1 One of the objectives included in the spatial options consultation relates to climate change. Further consideration of this objective is required in the light of the consultation responses and evidence which has been commissioned by the council. The WNSP will include policies in respect of climate change and is expected to make a key contribution to the council's ambitions in this respect.

7.7 Community Impact

- 7.7.1 At this stage the proposals in the spatial options are in draft form and as such do not have a direct impact on communities. The next consultation stage will set out preferred options and draft policies which will be subject to a full equalities impact assessment.

7.8 Communications

- 7.8.1 See 7.4.1 above

8. Background Papers

- 8.1 Responses to the West Northamptonshire Strategic Plan Spatial Options Consultation available at: <https://westnorthantsplan.inconsult.uk/WNSPOptions/consultationHome>

Appendix 1 – West Northamptonshire Strategic Plan – Spatial Options Consultation – Summary of Consultation Responses

Question 1: Is the vision appropriate for guiding development and growth in West Northamptonshire up to 2050?

- 231 respondents said ‘Yes’
- 578 respondents said ‘No’
- 644 respondents provided specific comments

Those who supported the vision made the following key points:

- Support for the inclusion of climate change resilience.
- Support the recognition of the West Northamptonshire’s leading role in the Arc and the strategic importance of its location and transport connections. Support recognition of the investment and growth opportunities presented by the Arc. The vision must align with the Arc Environmental Principles.
- Support for plan period to 2050.
- Support for hierarchy which recognises Northampton as the principal urban area.
- Specific acknowledgement of the role of the logistics industry to the local economy should be included.
- The vision reflects the existing spatial strategy which has served the area well.
- Support the identification of Daventry as a sub-regional centre
- The vision is consistent with the NPPF and will promote sustainable growth to meet the needs of the area, align growth and infrastructure and improve the environment and mitigate climate change. It provides a positive framework aligned with the three overarching sustainability objectives of the NPPF.
- Priority needs to be given to health.
- Must include reference to the sustainable use of natural resources
- Daventry should be clearly identified as a key location for housing and economic growth (rather than it being implicit). In addition, the Rural Service Centres should be identified as suitable for limited/non-strategic growth only.
- More detail on infrastructure provision and timing required.
- The vision for Brackley is appropriate.
- More sustainable energy supplies should be included.
- A positive and flexible approach will be required to ensure that the plan has the ability to be responsive and ambitious across the plan period.
- Would like to see more about improving Northampton as the County Town
- Should include reference to working with key partners such as health and the police.
- Some scepticism that the vision can be achieved.
- Support the pursuit of a thriving economy and an emphasis on innovation and high value sectors that provide jobs for residents. This approach encourages people to seek to live in vibrant and sustainable communities with access to services and facilities. It recognises the need to provide a network of vibrant and well-connected villages with a wider choice of homes and employment opportunities.

Appendix 1 – West Northamptonshire Strategic Plan – Spatial Options Consultation – Summary of Consultation Responses

- Reconciling net gain in biodiversity and retaining an accessible green network with substantial house building and enhancing employment opportunities will be a challenge.
- Police and fire services are essential for our communities and developer contributions will be sought to secure the additional services that are required.

Those who objected to the vision made the following key points:

- More emphasis required on protecting beautiful landscape and countryside. All landscapes should be preserved and improved, not just ‘valued’ landscapes. Greater protection required for countryside and the setting of villages.
- There seems to be a focus on building thousands of homes which will have no links to the areas they are planned for. More emphasis on brownfield land and improving services and infrastructure. Focus of the vision is on providing more houses rather than on what residents want.
- Greater emphasis on promoting employment growth
- Concern that the specific development options are not compatible with the statements set out in the vision. Specific examples include Options to the north of Northampton (Boughton and Moulton), Brackley, Towcester, Old Stratford/Deanshanger, east of Northampton (Ecton), Daventry, Junction 18 options near Crick and east of the M1, to the south of Market Harborough (East Farndon), and Long Buckby.
- A visionary transport strategy is required to support the rest of the vision such as quality of life and health outcomes. This should include a viable and effective public transport network. Public transport links from Daventry, Brackley and Towcester are particularly poor. Better road links required to link development to trunk roads. Disused railway lines and stations should be reopened, alongside the better use of existing lines, enhancing sustainable travel and economic and social opportunities.
- Part 2 Plan for Daventry and the neighbourhood plans for Brixworth and Moulton should be incorporated without change.
- Could be a ‘Vision for Any Place’ and lacks distinctiveness. Could’ve been ‘cut and pasted’ from any political document. Does not give a clear vision of the outcomes for the new council area.
- The dependency on the Oxford-Cambridge Arc should be reduced and should not result in our area taking a disproportionate amount of growth. The Arc appears to have been dropped by Government and should not be supported by WNC. Arc related growth will have adverse impacts on landscape, green infrastructure, biodiversity, and heritage. There is no justification for seeking to focus one-third of the new homes needed in the Arc which is only one twentieth of the country’s area. It is questioned whether the Arc is either needed or wanted.
- New Towns are a better option than making established communities bigger.
- The vision should be flexible and respond to changes. Should be reviewed every five years.

Appendix 1 – West Northamptonshire Strategic Plan – Spatial Options Consultation – Summary of Consultation Responses

- Will have a hugely detrimental impact on rural communities, the countryside, and rural landscapes. A fundamental rethink is needed.
- Rural areas paragraph is too woolly and should be rewritten. More information required on how rural areas will be protected.
- Should explain how the different elements of the vision integrate without conflict. For example, how economic growth and provision of jobs relates to the environment, rural areas, and villages.
- The vision lacks detail on how additional infrastructure and services will be provided to support the increase in growth, and how environmental and historic assets will be protected.
- Our vision should be to protect the environment and improve the quality of West Northamptonshire as a place to live and work. Insufficient attention is given to environmental issues including improved public transport.
- The impact of the Covid 19 pandemic, for example on working practices, has not been reflected in the plan.
- Greater emphasis required on place making e.g., ensuring new housing is designed with adequate green space and parkland. Need to raise the quality of design. Good design should reflect the best qualities of local distinctiveness.
- Insufficient focus on regeneration of brownfield land and ageing housing stock. Empty office and retail space could be utilised for housing. Greater focus needed on concentrated development in urban areas.
- Consider expanding Northampton to make it a substantial regional city. Spatial options do not support the vision of Northampton as a city and thriving hub for West Northamptonshire. Large developments on the periphery of the council area will not support the regeneration of Northampton. The neglect of the town centre should be addressed first before further greenfield land is lost. The document does not recognise the Council's ambition for Northampton to be a city.
- Consultation should be delayed because several factors are unknown e.g., the Arc Spatial Framework, the outcome of the Council's new settlements study, and the consideration of strategic warehousing needs. The process needs to be paused to enable a complete rethink.
- A range of different growth options should be presented together with an assessment of the impact of each option.
- A change of strategy is required to allow more growth in rural areas to support sustainability, local economy, and housing affordability. Growth in service villages should be part of a balanced housing strategy. The vision should be amended to ensure a positive, proportionate, and sustainable approach to growth in rural areas. Further housing growth of an appropriate scale to the villages should be supported.
- Housing should be spread more widely in locations where it will benefit Northamptonshire rather than adjoining areas such as Milton Keynes. Smaller developments in every village.
- Should revisit the rushed and poorly put together South Northamptonshire Part2 Local Plan

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- Reduction in housing proposed at Brackley, Towcester and Old Stratford.
- The plan fails to balance housing need with our climate emergency. A new outlook is required. There is no indication of how carbon neutrality will be achieved by 2030. The spatial options will not support the delivery of a low carbon West Northants.
- The timescale is too long and embeds a vision for growth that may be inaccurate. The time frame should be shortened. Not convinced that the data used to underpin the plan is valid given the impact of Brexit and Covid 19. Likely to need fewer houses than current estimates. A reassessment of the actual situation should be made.
- The document fails to provide any vision for the new authority. For example, how will it grow the local economy, what is the population target, how will the 'leading role in the success of the Arc' be measured, and what high value sectors are the council seeking to attract? A refresh is required.
- There is no mention of how residents will be involved in shaping their communities. There is no reference to democracy and how decisions will be made. A series of citizen assemblies should be held across the area to consider issues and develop ideas.
- Daventry's role as a sub-regional centre is questionable. The housing market is not strong enough and the previous Joint Core Strategy failed. The town lacks the necessary road and rail infrastructure. Major improvements to the amenities offered in Daventry are required to support the planned growth.
- Look at other options to expanding Northampton and other urban areas including free-standing new settlements such as Mawsley.
- More focus is needed on health and wellbeing including social care, CAMs, mental health, and expansion of hospitals.
- Infrastructure improvements are needed before further growth such as roads, healthcare, schools, and improved broadband connectivity.
- Scale of housing and employment development is disproportionate to the projected population growth and cannot be sustained by the existing infrastructure. Scale of growth should be reduced.
- The adequacy of the consultation arrangements is questioned. Plans should be built up from our local communities. Greater consultation and active engagement are required.
- Should include place-based visions for the new settlements at Old Stratford/NW Milton Keynes and Long Buckby.
- More consideration of flood risk is needed.
- Growth should be directed to the south-west of Northampton where infrastructure has already been provided i.e., the A45 Daventry Development Link (Flore-Weedon bypass).
- Overuse of the word 'sustainable'
- Should be focussing on housing that is affordable and economically achievable to address the affordability crisis and homelessness.
- A change of approach is required moving away from the developments of the last 25 years to support a low carbon economy. Society needs to adapt to lower levels of consumption and transportation.

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- Specific mention of agriculture is required e.g., to provide local food for local people
- Fails to conserve our finest attributes and has no pride in our built and rural heritage. Will lead to the ruination of our countryside and heritage.
- More explicit recognition should be given of the strong functional links to Milton Keynes in the vision.
- The strategy does nothing to support a wider regional growth strategy and a more positive strategy which contributes to the Arc's objectives should be considered.
- The vision should be about providing homes and jobs for local people and to support services for existing residents.
- The vision is not ambitious for our area and does not equip us to meet the challenges of the next 30 years. By 2050 the UK is committed to be carbon neutral, and the consequences of the current pandemic are likely to be far reaching for lifestyles.
- There should be much greater focus on provision of residential and employment opportunities in much closer proximity, avoiding long journeys, minimising fuel consumption per capita and encouraging healthy exercise.
There are no employment proposals associated with housing Towcester and Brackley and no housing proposals associated with employment at DIRFT.
- The West Northamptonshire Labour Group has the vision for West Northamptonshire as an integrated thriving green city region with a fully engaged population, excited by its future. It will have an increasingly skilled workforce living in good quality and improving housing. Young people will be at the centre with good schools and leisure facilities and a vibrant cultural life.

Other comments made by respondents who did not specify 'yes' or 'no':

- Promoting and unlocking the potential of the canal network would aid the achievement of many aspects of the vision. Any allocations should fully consider the impact on the canal network.
- The magnitude of the Northampton Gateway Strategic Rail Freight Interchange should be considered and reflected in a new settlement hierarchy.
- Consider a new rail station between Northampton and Wolverton
- Guidance provided by the Forestry Commission on assessing impacts on ancient woodland and the role of trees in supporting wider planning objectives.
- Should outline the opportunity provided by new settlements and strategic scale extensions to tackle issues such as health and wellbeing, climate change and modal shift through comprehensively planned large scale development.
- Should support redevelopment of brownfield sites in rural areas such as Hulcote
- A defined plan is required to support the delivery of local services otherwise development will continue to put strain on existing infrastructure.

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- The plan's vision should set out the environmental ambition for the plan area with a strategic approach to the protection and enhancement of the natural environment. This should include opportunities for nature recovery. There should be links to relevant plans and strategies such as the Upper Nene Valley Gravel Pits SPA SPD and Mitigation Strategy. The Plan should encourage multiple benefits from the use of land in urban and rural areas, recognising that land can deliver a wide range of ecosystem services required for sustainable development including climate change mitigation, flood management, improved water resources and water quality, biodiversity net gain, accessible high quality green infrastructure and associated health and wellbeing benefits, enhanced landscapes, and soil resources.
- The WNSP needs to take a more positive approach to employment land, particularly sites that are capable of accommodating logistics development.

Parish/Town Council responses:

The following Parish/Town Councils supported the vision:

- **Blisworth Parish Council** (no comments)
- **Boddington Parish Council** (no comments)
- **Brackley Town Council** (no comments)
- **Braunston Parish Council** - Support underlying principles. Overall vision should recognise that growth at regional and sub regional centres could undermine the rural area vision. Some concern regarding the SLAA conclusions and consistency with the SA. Further consultation required on all the spatial options.
- **Brixworth Parish Council** – Should incorporate the Daventry Part 2 Local Plan and make Neighbourhood Plans without change. Must include references to new Local Centres and emphasise connectivity is not just roads, it must build in requirements for cycling, walking and buses where possible. Further technical assessment needed of all site options.
- **Bugbrooke Parish Council** - Have concerns about securing infrastructure investment e.g., secondary schools
- **Culworth Parish Council** (no comments)
- **Cogenhoe and Whiston Parish Council** - Green spaces should be accessible and protected.
- **Cold Higham Parish Council** - The key challenge is how to achieve the vision
- **Evenley Parish Council** - Add references to high quality design, historic built environment, and connectivity between villages.
- **Flore Parish Council** – The vision has fine aspirations but is under threat from the continued expansion and use of the M1 corridor for warehousing. The danger is that the area will be the poor relation in the Arc providing the less desirable services rather than supporting high skilled jobs.
- **Holcot Parish Council** – Less focus on Northampton, more on the remainder of the area.

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- **Kingsthorpe Parish Council** - Providing more commuter choice in West Northants to connect urban centres, e.g., MK/Wellingborough. Investment in shuttle buses, coach station, trains.
- **Kislingbury Parish Council** – No specific comments on the vision
- **Nether Heyford Parish Council** -The progress of the Arc is just an assumption and subject to challenge. The goals need to be developed into SMART objectives.
- **Old Parish Council** - Doesn't mention prioritising the use of brownfield sites for housing growth, and is slightly vague on detail, e.g.: clearly defining what growth looks like or how rural villages will actually be connected.
- **Tiffield Parish Council** – The vision is appropriate but needs to take account of rapidly changing times. More detail and supporting evidence required.
- **Welton Parish Council** - Yes, as a region and Daventry is accessible to motorways, railways and DIRFT. However, infrastructure to accommodate growth would need to be radically expanded.
- **Woodford-cum-Membris Parish Council** (no comments)
- **Wootton Parish Council** (no comments)

The following Parish and Town Councils objected to the vision:

- **A5 Alliance of Parish Councils** - The document lacks vision and ambition and is driven by housing and employment targets. The vision needs a new approach to be resident focused, exciting and defines the role of West Northamptonshire locally, regionally, nationally, and internationally. The vision lacks detail on how improved services will be secured and provided. Clear measures of success and targets are required.
- **Cosgrove Parish Council**: The document lacks vision and ambition and is driven by housing and employment targets. The vision needs a new approach to be resident focused, exciting and defines the role of West Northamptonshire locally, regionally, nationally, and internationally. The vision lacks detail on how improved services will be secured and provided. Clear measures of success and targets are required.
- **Crick Parish Council** – There should be greater consideration for a low carbon economy adapted to climate change. Greater emphasis on a balanced economy. Greater emphasis on ‘green and clean’ to preserve greenfield sites, trees and rural settings, landscape and heritage, improved biodiversity, improved lifestyles and health and wellbeing. There should be a more innovative vision focussing on sustainable urban regeneration close to the labour market.
- **Daventry Town Council** - The towns selected for growth are not currently ‘well-connected’. Transit hubs need to be created to reduce the reliance on car-based commuting.
- **Easton Neston Parish Meeting** - Does not reflect the changing times we live in such as climate change and the pandemic.
- **Ecton Parish Council** – Welcomes the vision but objects to the inclusion of Northampton East within the consultation document.

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- **Hinton-in-the-Hedges Parish Meeting** - The need for housing and employment growth is questioned along with the concept of applying the Oxford/Cambridge Arc to WNC. No detail is given as to the provision of infrastructure such as doctors, schools, and utilities.
The nature and character of rural settlements should be protected and respected.
- **Kilsby Parish Council** - Object to the employment land allocations until a separate study into Logistics has been concluded.
- **Little Houghton Parish Council** - The nature and character of rural settlements should be protected and respected. The way of life that rural areas provide should be particularly valued.
- **Long Buckby Parish Council** - Further evidence required to substantiate proposals.
- **Moulton Parish Council** - There is no sustainability or environmental context. More detailed background relating to what development activity has taken place in recent years is needed.
- **Old Stratford Parish Council** - The document lacks vision and ambition and is driven by housing and employment targets. The vision needs a new approach to be resident focused, exciting and defines the role of West Northamptonshire locally, regionally, nationally, and internationally. The vision lacks detail on how improved services will be secured and provided. Clear measures of success and targets are required.
- **Overstone Parish Council** - A comprehensive, transparent highways vision, strategic plan and needs assessment are required. Large scale development should be infrastructure led, particularly highways infrastructure. Development should be focussed where good highways infrastructure exists e.g., the A45 Daventry Development Link.
- **Potterspury Parish Council** - The document lacks vision and ambition and is driven by housing and employment targets. The vision needs a new approach to be resident focused, exciting and defines the role of West Northamptonshire locally, regionally, nationally, and internationally. The vision lacks detail on how improved services will be secured and provided. Clear measures of success and targets are required.
- **Stony Stratford Town Council** – Comments provided relate to Spatial Option 5b (Question 28)
- **Syresham Parish Council** – The vision is good but the plans for development do not support it.
- **Walgrave Parish Council** – The vision for the rural areas is vague. Priority needs to be given to highways infrastructure to reduce the impact of traffic in rural areas.
- **Weedon Parish Council** - West Northants is the poor relation in the Arc with a low wage economy and poorly performing centres in Northampton and Daventry.
- **Whittlebury Parish Council** - The document lacks vision and ambition and is driven by housing and employment targets. The vision needs a new approach to be resident focused, exciting and defines the role of West

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Northamptonshire locally, regionally, nationally, and internationally. The vision lacks detail on how improved services will be secured and provided. Clear measures of success and targets are required. There is a disconnect between the plan and the Councils priorities.

- **Wicken Parish Council** - The document does not cover all of the options that should be considered and lacks any true visionary element.
- **Yardley Gobion Parish Council** - The document lacks vision and ambition and is driven by housing and employment targets. The vision needs a new approach to be resident focused, exciting and defines the role of West Northamptonshire locally, regionally, nationally, and internationally. The vision lacks detail on how improved services will be secured and provided. Clear measures of success and targets are required.

The following Parish/Town Councils did not specify ‘yes’ or ‘no’:

- **Blakesley Parish Council** - The document lacks vision and ambition and is driven by housing and employment targets. The vision needs a new approach to be resident focused, exciting and defines the role of West Northamptonshire locally, regionally, nationally, and internationally. The vision lacks detail on how improved services will be secured and provided. Clear measures of success and targets are required. The bid for city status should be mentioned.
- **Greens Norton Parish Council** - The document lacks vision and ambition and is driven by housing and employment targets. The vision needs a new approach to be resident focused, exciting and defines the role of West Northamptonshire locally, regionally, nationally, and internationally. The vision lacks detail on how improved services will be secured and provided. Clear measures of success and targets are required. The bid for city status should be mentioned.
- **Rothersthorpe Parish Council** – The vision lacks detail on how additional or improved services will be provided to support growth. There should be a defined plan for the provision of local services.
- **Silverstone Parish Council** – The vision fails to recognise the significance of the area as home to many leading high performance engineering companies as well as the world leading motorsport venue at Silverstone. Brackley and Towcester should be considered as separate settlements rather than bundled together.

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Question 2: Are the ‘Green and Clean’ spatial objectives 1 to 4 appropriate for guiding development and growth in West Northamptonshire?

- 275 respondents said ‘Yes’
- 403 respondents said ‘No’
- 496 respondents provided specific comments

Those who supported the spatial objectives made the following key points:

- Park and ride, effective public transport, and other measures to reduce traffic and pollution
- Support sustainable growth that supports natural capital gain
- New developments should be carbon neutral from the outset with active travel networks and public transport (electric buses) built in from the start. Innovative green energy microgrid options for new estates.
- Strategic development allocations should be located where they can mitigate the effects of climate change, by limiting the need to travel and offering a choice of travel modes.
- Further definition required i.e., net zero or carbon neutral and by when?
- Increased employment through the establishment of green industries should be included on the objectives.
- Implementation is crucial
- A more ambitious target of carbon neutral by 2027
- 2030 is an unrealistic deadline. Will require significant investment, higher house prices and new technologies.
- Include specific objective of reducing carbon through more tree planting
- Solar energy should be on existing and new buildings rather than as solar farms on agricultural land.
- Should acknowledge the key role that the sustainable movement of freight will play in achieving climate change goals
- Further growth in rural areas could enhance their sustainability
- Support that climate change is identified as a key strategic issue and these objectives should be key in determining the choice of development locations.
- Some green areas are not being used to their full potential.
- Financial and technological considerations need to be taken into account to ensure the transition to net carbon zero is sustainable. Impacts on society and the economy will need to be considered if people can’t afford to access ‘clean’ travel.
- Objective 1 could be broadened to include climate change adaptation, mitigation and resilience, sustainable design and construction, climate change impacts such as future flood risk, and retro fitting of existing development.
- An additional objective on natural resources cover water, minerals and waste could be added.
- Objective 2 should include a commitment to 20% net gain, address fragmentation of habitats and adopt a natural capital approach.

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- There is a risk of development impacting upon the Nene Valley SPA and mitigation will be required.
- Objective 4 is welcomed, in particular the reference to ‘heritage assets and their settings’
- A number of respondents support the objectives and then seek to demonstrate that particular sites or spatial options that they are promoting are consistent with the objectives.

Those who objected to the spatial objectives made the following key points:

- A number of respondents consider that the spatial options are not consistent with the ‘Green and Clean’ spatial objectives. The specific options mentioned are land south of Market Harborough (East Farndon), North-west of Milton Keynes/Old Stratford, Long Buckby, Towcester, east of DIRFT, east of Northampton (Ecton), north and west of Daventry (Braunston), all of the employment options adjoining M1 junctions, options to the north of Northampton.
- Most of the options are greenfield which should be used for agriculture. Little consideration has been given to the use of brownfield sites. Each of the spatial options should be assessed against the objectives.
- Additional actions are required to achieve carbon neutral targets such as an integrated, sustainable, and inclusive transport strategy linking housing to employment and services, the establishment of green buffer zones around existing and new housing, a network of green corridors, and solar and wind generation which follows and community energy model.
- Ensure housing is located in areas of job growth to reduce commuting.
- The spatial objectives lack anything new and are ‘business as usual’. They smack of box ticking and green washing. They fail to provide any indication of the magnitude of ambition or any quantifiable target.
- Objective 1 should be more ambitious and positive.
- Measures to reduce travel are essential, such as improved public transport, and the provision of live/work units. Traffic congestion has a major impact on air pollution. The aim for every transport development or initiative should be to reduce emissions, infrastructure supporting the charging of electric vehicles of all descriptions, electric replacing diesel buses for example.
- More detailed, specific, and unambiguous objectives are required. Specific targets are needed. Stronger wording such as ‘insist’ rather than ‘encourage’. Aim for higher targets such as passive house level. Clear targets should be specified for the reduction in carbon levels and the scale of woodland/tree planting.
- The objectives do not go far enough, further detail required as to how the impacts of new development will be mitigated and the standards expected in terms of renewable energy, green space, electric charging, public transport, and active travel.
- Should create a woodland/forest area for carbon capture and create wild meadowland to support biodiversity.

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- Spatial options do not indicate how green spaces would be provided within developments. Assurance is required that substantial areas of usable green space will be provided both for the existing villages and new developments. Protecting habitats, species and biodiversity should be integrated with all new development.
- All new housing should have air source heat pumps and car charging points.
- More thought required on the issue of lighting, including street lighting, and the impact this has on light pollution and energy use.
- Based on recent development and planning decisions a complete reappraisal is required on housing and the environment is required. Including the need for housing.
- West Northants should be self-sufficient in its waste management.
- Objective 3 should be about protecting landscapes which are valued by residents and users of the land.
- The carbon footprint of the spatial options should be set out.
- Concern that net gain in biodiversity cannot be achieved to the scale of development proposed.
- More can be done to design warehousing and housing developments so that they support wildlife
- Objective 4 – Heritage – the use of the words ‘where possible’ is too weak.
- There should be a clear strategy to limit the loss of greenfield sites and a target for the use of brownfield land.
- There should be specific recognition of the Northampton and Lamport Railway and other industrial heritage locations. Heritage locations should not be seen as negative constraints. For example, a heritage railway could be integrated into a larger rail-based operation.
- We need to support nature recovery and growth.
- There is no objective that refers to good design. Good design – building beautiful – including place making is at the heart of the NPPF and should be central to the Strategic Plan.
- Objective 3 – special landscape areas in Daventry’s area were previously removed – are these now to be reinstated? If not, Objective 3 is misleading. The LPA should be aware of the case law/ambiguities concerning what is now NPPF para 174 a) - as to which areas are to be regarded as valued landscapes, notwithstanding the lack of national or local designation. Landscape (and townscape) character is important throughout West Northants.
- Landscape policies should be working towards statutory designations such as an AONB.
- Tackling the climate emergency should be the starting point for every initiative. Developments should be carbon neutral or carbon negative. In new housing development, community energy models should be developed and housing future proofed.

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- The green environment should be the starting point with environmental focal points linked by green corridors brought into our towns, settlements protected by green belt, zones for tree planting identified, and green space protected.
- History and heritage should be celebrated.
- Our streets and public spaces need to be safe

Other comments made by respondents who did not specify ‘yes’ or ‘no’:

- WNC should be the first council to make all new houses zero carbon
- The objectives are silent on other environmental sustainability targets such as biodiversity, protecting wildlife and habitats. The need for substantial areas of woodland needs to be considered.
- Land of high landscape sensitivity adjoining settlements should be protected
- Preservation of heritage assets should include a list of culturally sensitive sites.
- Some of the statements would benefit from strengthening e.g., ‘low carbon energy’ should be replaced by ‘zero carbon energy’.
- A flexible approach to biodiversity net gain is required to enable multiple options for securing off site compensatory measures.
- (Hardingstone Parish Council) concern how the climate change objective will be achieved without stronger mandates from central government on issues such as solar panels, and grey water recycling.
- Climate change should be a separate objective.
- Delivering development at net zero carbon through building fabric remains exceptionally challenging and costly. Carbon off-setting through the potential allocation of significant areas of open land for tree planting, would provide the opportunity to assist this objective in a way that could also enhance biodiversity.
- Objective 1 could explicitly recognise resilience to extreme heat, cold, air pollution and risk of flooding, especially for our most vulnerable residents. Should also include ‘active’ as well as ‘sustainable’ travel
- An additional objective relating to ‘carbon capture’ could be included.
- The Council should commission and publish a survey of all land in the District that could be used for Biodiversity offsetting purposes as this would create a register of sites and landowner that developers could use if their sites are unable to achieve a 10% biodiversity uplift on site.
- No clear objective to address car dependence and secure modal shift. The plan must secure a pattern and form of development that maximises sustainable travel modes over car use.
- More work is needed to identify how communities can grow whilst preserving heritage, landscape, green infrastructure, and the environment. There should be a greater focus on protecting green space and countryside.
- More emphasis is needed on localising service provision to reduce car travel.

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Parish/Town Council responses:

The following Parish/Town Councils supported the spatial objectives:

- **Blisworth Parish Council** (no comments)
- **Brackley Town Council** (no comments)
- **Braunston Parish Council** - Net gain in biodiversity should be secured within the WNC area and as locally as possible.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Cold Higham Parish Council** - How the objectives will be achieved and measured is key.
- **Culworth Parish Council** (no comments)
- **Ecton Parish Council** – the ‘Green and Clean’ objectives are welcome, and the recognition of landscape and heritage is good to see.
- **Evenley Parish Council** (no comments)
- **Flore Parish Council** – The objectives are fundamentally important and should have the highest priority. Objective 3 is undermined by the spatial option suggesting further logistics expansion at junction 16.
- **Hinton-in-the Hedges Parish Meeting** – The objectives are laudable, but the scale of growth is at odds with them. Renewable and low carbon energy should be encouraged everywhere.
- **Holcot Parish Council** – These objectives should overarch the other objectives.
- **Kilsby Parish Council** - Whilst the spatial objectives are supported the actual development options are detrimental to these
- **Kingsthorpe Parish Council** - New development to provide public transport contributions, more walking and cycling facilities, connectivity with existing centres. Newbuilds to avoid fossil fuel connections. Improve air quality across the County.
- **Little Houghton Parish Council** (no comments)
- **Old Parish Council** – Greater focus should be given on protecting more of the area’s green spaces.
- **Syresham Parish Council** – appropriate objectives but they have not been incorporated into the plans.
- **Tiffield Parish Council** – No indication of how carbon neutrality can be achieved.
- **Wappenham Parish Council** – Objectives 1-4 are key, but the spatial options contradict these objectives.
- **Woodford-cum-Membriis Parish Council** (no comments)

The following Parish and Town Councils objected to the spatial objectives:

- **A5 Alliance of Parish Councils** – The objectives lack anything new and are all current well-established objectives. The proposals contradict the objectives especially Option 5b. A clear road map to achieving net zero is needed – ‘promoting’ and ‘encouraging’ are not enough. Each of the options should be

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assessed against the climate change objectives. The strategy should seek to work with local councils to develop community plans.

- **Boddington Parish Council** - Climate change should be a major factor and include improvements to existing infrastructure and housing to reduce their carbon footprint. Mitigation schemes for HS2 and other large scale construction projects should be included.
- **Bugbrooke Parish Council** - The objectives don't go far enough in promoting sustainable design and construction. Promoting practical travel options should be a priority.
- **Cosgrove Parish Council** – Many of the objectives are legal requirements and there is not detail on how they will be achieved. They are too vague and need to be strengthened to achieve climate change objectives. The development proposals, particularly the proposals at Old Stratford, breach the objectives.
- **Crick Parish Council** – The objectives are not guiding development. Options 3a and 3b breach objectives on climate change and green infrastructure and natural capital.
- **Deanshanger Parish Council** – Many of the options ignore these laudable objectives. Option 5b will increase car use and will not support the climate change objectives.
- **Easton Neston Parish Meeting** – No detail of how climate change and wellbeing objectives will be achieved. Objective 3 should include 'making efficient use of land, along with the prudent use of natural resources and minimising waste and pollution.'
- **Greens Norton Parish Council** - Many of the objectives are legal requirements and there is not detail on how they will be achieved. Many of the spatial options breach the objectives.
- **Long Buckby Parish Council** - Inclusion of provision for green energy generation projects.
- **Moulton Parish Council** - These objectives are superficial and lack any substance or useful information. This would seem to be a classic case of "greenwashing" with many fine words. There has been no mention of the impact on public transport nor what might be done to provide it
- **Nether Heyford Parish Council** - Waste management has been forgotten. Improved management of public spaces, particularly highway verges, is needed to attract visitors
- **Old Stratford Parish Council** - Many of the objectives are legal requirements and there is not detail on how they will be achieved. They are too vague and need to be strengthened to achieve climate change objectives. The development proposals, particularly the proposals at Old Stratford, breach the objectives.
- **Overstone Parish Council** - Building homes to the north of Northampton whilst promoting new employment areas to the south is not 'green and clean'. Stringent policies are required to protect villages from the impacts of growth such as traffic congestion.

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- **Potterspury Parish Council** - The objectives lack anything new and are all current well-established objectives. The proposals contradict the objectives especially Option 5b.
- **Walgrave Parish Council** - A key emphasis should be to ensure our villages retain their heritage, green landscapes and natural green habitats and environments, and have a controlled traffic throughput.
- **Weedon Parish Council** - Question whether the objectives are realistic. Rather than encouraging large logistics developments the plan should be incentivising local farmers and suppliers.
- **Welton Parish Council** - 2030 carbon neutral timeline will adversely hit Daventry's economy.
- **Whittlebury Parish Council** - Many of the objectives are legal requirements and there is not detail on how they will be achieved. They are too vague. The development proposals contradict the objectives.
- **Wicken Parish Council** – The wording of the objectives, particularly Objective 1, is weak and ineffectual.
- **Wootton Parish Council** – Concerns about climate change and biodiversity.
- **Yardley Gobion Parish Council** - Many of the objectives are legal requirements and there is not detail on how they will be achieved. The development proposals contradict the objectives.

The following Parish/Town Councils did not specify 'yes' or 'no':

- **Blakesley Parish Council** - Many are legal requirements. No detail is provided as to how they will be achieved. The spatial options breach the objectives
- **Brixworth Parish Council** - clarification of terminology required between carbon neutral and net zero. Net zero by 2030 should be the target
- **Hardingstone Parish Council** - concern how the climate change objective will be achieved without stronger mandates from central government on issues such as solar panels, and grey water recycling.
- **Kislingbury Parish Council** - Green and open areas are irreplaceable resources for health and wellbeing they need to be preserved and made accessible. It would be a real achievement if West Northants became a 'golden triangle' for those who live here rather than for logistics, warehouses, and unaffordable homes.
- **Ravensthorpe Parish Council** - It is hard to see how the development proposals are compatible with the transition to net zero carbon.
- **Rothersthorpe Parish Council** - the 'green and clean' objectives do not go far enough. The plan should adopt a gold standard to ensure that West Northants is a national leader in 'green and clean' initiatives.
- **Silverstone Parish Council** - there is not enough about environmental initiatives such as fitting solar panels on commercial developments, increased home insulation and car charging points.

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- **Towcester Town Council** - New housing must be heated by non-fossil fuel. New housing should be provided where the demand is driven by employment growth.
- **Yardley Gobion Parish Council** - Concern that the proposals breach the objective

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Question 3: Are the spatial objectives 5-7 – Improved Life Chances – appropriate for guiding development and growth in West Northamptonshire?

- 280 respondents said 'Yes'
- 331 respondents said 'No'
- 366 respondents provided specific comments

Those who supported the spatial objectives made the following key points:

- WNC desperately needs enhanced children's special education needs provision.
- Recognition of the lack of equality in life chances and the objective of achieving equality should be included.
- Objective 5 – skills enhancement should be linked to economic objectives
- Objective 7 – should be more specific with regard to infrastructure objectives
- Good quality, accessible and affordable housing are important in achieving improved life chances.
- Clear plans for investment and infrastructure are required to support the objectives.
- There should be an emphasis on providing appropriate housing and facilities to support people throughout their life on a local level.
- For larger developments all the community infrastructure should be provided before 50% of the housing is built. Financial penalties should apply if this is not achieved.
- Objective 6 does not mention the hospitals that need to be further developed/redeveloped. Greater use of Daventry hospital.
- Education, health and wellbeing and infrastructure are vital for improved communities. Improvements in career guidance. More intention of providing local schools.
- Use of alternative healthcare services could be included.
- Concern that developers will not comply with the objectives.
- Lack of opportunities for young people mean they have to move away.
- Picking the correct locations for new schools is key.
- Further detail required on how they will be implemented.
- Objective 6 should be in front of Objective 5.
- Lack confidence that WNC can deliver the objectives
- Provide public housing for the elderly and those who need care.
- Development in sustainable rural settlements would provide investment to retain and enhance public transport connections to larger urban areas.
- Objective 6 - We would encourage this objective to consider existing inequalities that could be addressed through well planned infrastructure and growth. This could include the consideration of unequal distribution of green space and the correlations between air quality and areas of deprivation.
- Should focus on skills and education in the construction sector to address skills shortage.

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- Would like to see specific mention of Daventry College and its development.
- Northampton needs a second or larger hospital.
- Could have a specific section on improving social mobility for our children and develop our higher education offer in areas such as engineering, bioscience, and IT.
- Support more housing in town centres and a vibrant social economy.
- Greater investment required in social, childcare, and the provision of greener more ‘care economy’ jobs is required. Too much focus on logistics and low paid/low skill jobs.
- Employment opportunities are relevant to improved life chances and there should be more emphasis on local employment.
- Infrastructure should be more than adequate and exceed current requirements.
- Objective 5 should recognise the importance of The Hub at DIRFT.
- Objective 7 should include specific reference to the logistics sector.
- Objective 6 – Sport England Active Design Principles should be embedded in policy to implement this objective.
- Greater youth facilities within Brackley. Retention of service such a Brackley Library.
- Deliver affordable homes which will enhance and maintain the rural area.
- Deliver sustainable tourism

Those who objected to the spatial objectives made the following key points:

- Objectives sound good but there is no detail on how they will be achieved. Objectives 7 and 8 are too vague. Specific requirements are needed to deliver improvements in a timely and sustainable manner. A clear understanding of how green infrastructure can be created and managed – for example a Parks Trust as in Milton Keynes. More information needed on how education and health services will be provided.
- Concern that further growth will exacerbate existing problems
- There should be greater emphasis on job creation
- A number of respondents consider that the spatial options are not consistent with the spatial objectives. The spatial options mentioned include Towcester, Long Buckby, north-west of Milton Keynes/Old Stratford, east of Northampton (Ecton), north of Northampton (Boughton/Moulton), south of M1 junction 15a.
- Life chances in rural areas are limited by accessibility to the private car. A strategic public transport policy is required to address this inequality.
- Need a comprehensive plan for post 16 education including a workable public transport system that young people can access for education and training.
- Loss of agricultural land means that tenant farmers are struggling to sustain workable sized farms.
- Affordable housing could be provided on brownfield sites and disused buildings.
- Significant investment is required to raise educational standards and the funding is not available.

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- Objectives 5-7 should be implemented now before any of the development takes place. Further development without services such as education, health, and welfare will overburden existing services and increase congestion and the need to travel. Existing services such as health and education cannot cope with the existing population.
- Building more houses will not achieve the objectives. Pollution from the development proposals will adversely affect life chances.
- Reinstate former Councils to ensure closer connection with local communities.
- Detailed comments provided on the improvements required to the social care and education systems in West Northants.
- The objectives must aim to tackle inequalities and prioritise action to address poverty and suffering.
- Overemphasis on town/city life. Support is needed for young people in rural areas such as provision of local (small-scale) employment opportunities.
- Concern that the objectives are not deliverable.
- Concern that consultation has not been adequate.
- Objectives are unaffordable and will not be delivered.
- Improvement in education requires action at a national level.
- There are major problems in education and social care due to underfunding which will be exacerbated by further development. Building more houses will not address the cycle of poverty.
- Objective 6 should also look to enhance existing places.
- The wellbeing and life chances of exiting residents should be assessed as part of development proposals.
- Villages should retain their separate identities with clear before zones enhanced with tree planting
- New warehousing should be focused close to the motorway and served by rail to reduce climate impact.
- Investment needed in new schools and improved facilities at Brackley.
- Encourage links to the Open University and Open College provision.
- A clear schedule of infrastructure needs should be published.
- There is nothing about connectivity and e-learning or remote training. The importance of remote connections and support for remote health and education services needs to be included in this. There is little about protecting inner urban green areas. There is no reference to safeguarding the vulnerable within the society nor of the response to the increase in needs for an older population.
- Footpaths linking local villages should be reinstated and provided to enable exercise and access to existing facilities.
- Objectives 5, 6 and 7 do not fully correspond with the vision. Notably, reference to provision of and access to housing for all needs is missing and should be included.
- How could objectives 5 and 6 be applied to the consideration of planning applications?

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- The plan should consider a broader range of sites in and around the towns (the most sustainable locations) to ensure a supply of smaller sites as well as strategic ones.
- The proposed secondary school next to the Icon Centre in Daventry should be relocated to where the new housing is proposed.
- Loss of countryside will not improve life chances. People need access to nature to support their wellbeing.
- Primary service villages need to be able to grow in order to support infrastructure provision
- Objective 6 should facilitate active lifestyles
- Comments regarding the lack for services and facilities in Towcester to support the growth that is required.

Other comments may by respondents who didn't specify 'yes' or 'no':

- Growth in rural areas could help to deliver these objectives. Without a meaningful level of growth these objectives will not be achieved.
- A number of respondents seek to demonstrate how the particular development proposals/ spatial options that they are promoting would help to deliver the objectives.
- Ensuring Northampton is a thriving county town is essential to achieve the objective. A range of transport improvement are recommended including a 360-ring road modelled on the A45, measures to improve traffic flows on the strategic access roads, and a network of park and ride/ rapid transport solutions.
- Initiatives to promote health and wellbeing are supported. These include, ensuring residential development follows Secured by Design principles, accessible employment opportunities are provided, and undertaking health impact assessments for major developments
- The strategy needs to respond to the demographic, technological and social trends likely to take place in the next thirty years, considering the geographical impact of the following changes:
 - Workplace organisation - greater automation of warehouses, self-driving lorries
 - A continuation of the trend towards working from home with implications for increasing minimum home sizes
 - The climate emergency – impact on housing and transport
 - The shift towards maintenance and durability, (of for example, white goods), and much more reuse and recycling.
 - Understanding better the relationship between housing need and affordability and the role of public and private sector housing in meeting this need.
 - An aging population
 - Health care and social care needs – implications of technology and developing models of care. Is the current acute hospital provision fit for purpose until 2050? Offering a range of provision for older people, including 'villages and stepped care.'
 - Changes in leisure demands and its links with health. New school provision should be at the centre of our communities together with facilities for community learning. In supporting growth, the plan should aim to reduce inequalities and promote opportunities for all.

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Parish/Town Council responses:

The following Parish and Town Councils supported the spatial objectives:

- **Blisworth Parish Council** (no comments)
- **Brackley Town Council** (no comments)
- **Braunston Parish Council** – protection for vulnerable adults should be included.
- **Brixworth Parish Council** - The plan must include specific infrastructure objectives. Schools, primary care services must be provided online with building sustainable communities. Housing needs to be developed with more variety of choice to allow for the first-time buyer as well as homes aimed at older people.
- **Church with Chapel Brampton Parish Council** (no comments)
- **Cogenhoe and Whiston Parish Council** - Services need to be localised not just focussed on the urban developments
- **Cold Higham Parish Council** - Should the elderly have a mention, as the population is ageing?
- **Culworth Parish Council** (no comments)
- **Daventry Town Council** - Agree with wording but has to be further engagement with communities and schools to better identify location and investment to ensure positive outcomes.
- **Evenley Parish Council** (no comments)
- **Flore Parish Council** (no comments)
- **Holcot Parish Council** - The infrastructural needs should be prioritised - historic development has been development and growth in that 'infrastructure catches-up'. A single, joined-up plan is needed.
- **Kingsthorpe Parish Council** – Good aspirations.
- **Kislingbury Parish Council** - green and open areas are irreplaceable resources for health and wellbeing. They need to be preserved and maintained in the face of continued demands from developers. They also need to be made accessible through the provision of adequate bus, walking, and cycling routes as well as adequate health services.
- **Little Houghton Parish Council** (no comments)
- **Long Buckby Parish Council** (no comments)
- **Nether Heyford Parish Council** (no comments)
- **Old Parish Council** – access to green spaces should include good access to real countryside. Benefits to residents of integrated health and care packages and good public transport.
- **Syresham Parish Council** - Good objectives, but the size of the proposed developments will put enormous stress on local education and health services and infrastructure.
- **Tiffield Parish Council** (no comments)
- **Weedon Parish Council** – Cannot fault the objectives but are they over ambitious?

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- **Welton Parish Council** - Education in West Northamptonshire is recognised as under achieving and by working in conjunction with other life skill areas, horizons and prospects will be widened. Promoting health and well-being within schools will improve welfare in the home.
- **Woodford-cum-Membris Parish Council** (no comments)

The following Parish and Town Councils objected to the spatial objectives:

- **A5 Alliance of Parish Councils** - There needs to be a good and accessible education and training offer for young people in rural areas. This relies of effective public transport but there is no indication of how this will be provided. Developing links between business and schools also requires public transport. Schools should be within walking distance of new homes. Appropriate infrastructure such as education, health, community, roads, and services should be provided before expansion takes place.
- **Boddington Parish Council** – more emphasis needed on mobile phone coverage in rural areas.
- **Bugbrooke Parish Council** – Objective 5 should have a stronger focus on early years. Provision of community and village halls should be included.
- **Cosgrove Parish Council** - Schools should be within walking distance of new homes. Appropriate infrastructure such as education, health, community, roads, and services should be provided before expansion takes place.
- **Crick Parish Council** – The objectives are superb and appropriate, but they are not guiding development. Examples provided as to how Spatial Option 3a conflicts with the objectives.
- **Deanshanger Parish Council** - Schools should be within walking distance of new homes. Affordable transport such be provided for post 16 education and training. Appropriate infrastructure such as education, health, community, roads, and services should be provided before expansion takes place.
- **Easton Neston Parish Meeting** – Objective 6 – greater consideration needs to be given to the health and wellbeing of existing residents faced with large development proposals. Objective 7 – the infrastructure deficit needs to be addressed before further development.
- **Hinton-in-the-Hedges Parish Meeting** – Lifestyle is a bigger determinant of health and wellbeing than the quality of housing that is provided.
- **Moulton Parish Council** - Again, fine words rather than facts and no substance regarding how this might be achieved.
- **Old Stratford Parish Council** - All schools should be walking distance of all new homes. All health facilities should be available from day one. Infrastructure and development need to state that this must be in place and enhanced prior to any expansion or new settlements being developed.
- **Overstone Parish Council** – Infrastructure should be prioritised. Poor road networks are detrimental to quality of life. The A45 Daventry Development Link Road provides the opportunity for development ahead of any other SUEs.

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- **Potterspury Parish Council** - Education and training is crucial to our local economy. Much of secondary education in the rural areas, and post-16 provision in particular, relies on transport. Without a workable and a sustainable public transport system education in West Northants will not achieve its potential and underperform. Developing links between businesses and colleges and schools relies on accessible public transport. New developments must have schools and other infrastructure in place before homes are complete.
- **Towcester Town Council** – Objective 5 should specify that there are sufficient places available in local schools.
- **Walgrave Parish Council** - Whilst the objectives are positive and welcome, thorough consideration should be given to how these will be implemented within the rural areas, lack of public transport and social, facilities ensure that rural areas are disadvantaged compared to urban areas.
- **Whittlebury Parish Council** – Need strengthening to address climate change, schools within walking distance, include early years education. Infrastructure such as health facilities to be in place before expansion.
- **Wootton Parish Council** – Greater ambition needed to improve life chances. Infrastructure provision should be more than just ‘adequate’.
- **Yardley Gobion Parish Council** - Need strengthening to address climate change, schools within walking distance, include early years education. Infrastructure such as health facilities to be in place before expansion.

The following Parish/Town Councils did not specify ‘yes’ or ‘no’:

- Blakesley Parish Council - Schools should be within walking distance of new homes. Appropriate infrastructure such as education, health, community, roads, and services should be provided before expansion takes place.
- Greens Norton Parish Council - These need to be strengthened to support climate change and carbon neutral ambitions. All schools, sports facilities should be within walking distance of all new homes. All health facilities should be available from day one and not years after the developments are started. The infrastructure and development need to state that this must be in place and enhanced prior to any expansion.
- **Silverstone Parish Council** - Existing schools also need investment. The line ‘joined up and local services with health’ makes no sense. In Objective 5 the National College of Motorsport at Silverstone is not included. There is no reference to Leisure Centres including the excellent council-owned ones at Towcester and Brackley. Nothing about investment in health.

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Question 4: Are the spatial objectives 8 and 9 – Connected Communities – appropriate for guiding development and growth in West Northamptonshire?

- 256 respondents said ‘Yes’
- 367 respondents said ‘No’
- 422 respondents provided specific comments

Those who supported the spatial objectives made the following key points:

- Addressing social exclusion and areas of deprivation, achieving social cohesion, and maintaining residential amenity are all aims to be supported, as is the improvement of strategic public transport connections across the area.
- Smaller employment centres connected by active travel routes to existing villages and large employment areas focussed on the towns.
- Improved connectivity must also have the aim of achieving improvements in equality of opportunity and social mobility.
- There is a massive opportunity to increase cycling through the provision of an integrated network of cycle paths.
- Objective 8 should recognise the key role that the sustainable movement of freight can play in achieving climate change goals.
- A number of respondents seek to demonstrate that particular development proposals / spatial options would help to deliver the objectives.
- Rather than one or two major development locations, it is important to explore how a range of other smaller sites around the edge of Northampton can support better public transport connectivity
- The plan should not be over prescriptive in terms of measures such as EV charging which are being introduced through the Building Regulations.
- Specific targets for EV charging should be produced.
- An affordable public transport network is needed.
- A range of measures are suggested: car free town centres, low emission neighbourhoods, more investment in train/tram routes and better/subsidised bus routes to major employment areas.
- Greater integration of housing and employment required to reduce the need to travel.
- Traffic surveys should be undertaken to provide an overall assessment of the impact on communities.
- The plan should support sustainable growth in rural areas in order to safeguard services such as public transport.
- Should reference the need to integrate new infrastructure provision with wider natural capital benefits.
- Should consider transport issues across the Arc and not just within West Northants.
- It is easier to enhance transport links from the edges of towns into the centres of towns than try to build large communities in isolated places.
- Would prefer to see investment in rail infrastructure and accessibility ahead of more roads. Greater rail connectivity is required. Opportunities for reopening routes and light rail should be explored.

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- Improved maintenance of roads and lighting required.
- Objective 8 should be strengthened to support development in accessible locations that maximise and makes efficient use of existing transport infrastructure and public transport connections. It should also have regard to the National Decarbonisation Plan for Transport.
- There should be a better framework for identifying community infrastructure requirements.
- The plan needs to embrace the use of heritage technology integrated with new/emerging technology e.g., very light rail and heritage railways.
- Accessibility for fire and rescue services needs to be considered.
- Improving social cohesion is beneficial in reducing antisocial behaviour. Incorporating secured by design principles reduces opportunity for crime.
- More charging points for Brackley and carbon neutral passenger services.

Those who objected to the spatial objectives made the following key points:

- The spatial options will not help to deliver these objectives. Specific examples include: North-west of Milton Keynes/Old Stratford, south of Towcester, Long Buckby, east of Northampton (Ecton), north and west of Daventry, north of Northampton (Boughton and Moulton), east of DIRFT, south of M1 junction 15a,
- Public transport not adequately addressed. A strategic public transport policy is needed especially for rural areas to secure regular public transport for all villages.
- Particular problems for younger people needing to access education and training are highlighted.
- An integrated, sustainable, and inclusive transport strategy is required, with visionary plans for public transport, an integrated network of EV charging points and car hire hubs. Major improvements to existing housing stock to support EV charging.
- Infrastructure needs to be provided at an early stage.
- Lack of confidence that WNC can deliver these objectives.
- More provision required for cycling and walking.
- Consideration should be given to the changes in travel demand e.g., more home working.
- Objectives lack detail as to how they will be achieved. How will they be measured?
- Not clear how reducing the need to travel can be achieved.
- Combatting congestion should be a major issue.
- Major improvements required to road infrastructure before development. Examples include Towcester bypass, dualling of the A5.
- Concern that major road improvements will either not be delivered or not delivered to an appropriate standard due to the reliance on developer contributions.
- Objective 9 should apply everywhere, not just to urban areas.
- Private car travel needs to be driven down in order to reduce pollution.

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- Should include mobile and broadband connectivity.
- Unclear what is meant by maximising and promoting the use of alternative travel modes.
- The railway station at Long Buckby does not provide facilities for disabled access.
- Parking restrictions in Brackley are damaging local business and the environment.
- The objectives appear unrealistic given the poor state of our existing infrastructure such as roads. Will create dormitory towns increasing traffic and pollution.
- How will rail networks be improved? Suggested improvements include a Daventry Parkway station and new links for Brackley and Towcester.
- Introduce community car loan schemes.
- Northampton should consider park and ride locations.
- Too much emphasis on roads. Active and sustainable travel needs to be at the forefront of this objective. Objectives will lead to more congestion, pollution, and transport inequality.
- Focus new warehousing development in locations close to motorway junctions.
- Congestion can only be addressed by the construction of an orbital route around Northampton and the development of brownfield sites first.
- Urban communities are bad for people's health and wellbeing. WNC should not be protecting or building them.
- Disagree with the objective of linking 'new and existing communities'. Communities need to be able to access green space on their doorstep.
- Spend limited funds on low emission buses, building cycle ways and improving footpaths.
- Not possible to prioritise sustainable travel in rural areas. Cars are essential.
- Stronger commitment needed to achieve modal shift through a range of measures such as rapid transit systems, new railways, bus services and lanes
- Good connections with North Northants are important and should be coordinated.
- More focus needed on delivery. There is little about the impact of through traffic on the area.
- The objective need to be applied to the spatial options.
- Deprivation will not be addressed by building more unaffordable homes.
- Patterns of development and urban design should make sustainable modes including public transport the natural first choice.
- Objective 8: Amend wording as described below to improve clarity and ambition: 'prioritise sustainable travel as an attractive and practical option across West Northamptonshire by maximising and promoting the use of alternative travel modes to reduce reliance on the private car'.

Other comments made by respondents who did not specify 'yes' or 'no':

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- The objective falls short of guaranteeing multi-modal infrastructure development. Integrated cycling and walking infrastructure should be a key part of the objectives.
- Major improvements to road infrastructure are required.
- Transport network needs to be planned as an integral part of new development.
- Electric charging for EV is not inclusive and should not be called out as a priority over improving and developing infrastructure that grows “Multi Modal” options.
- Objective 8 is meaningless unless there is an actual strategy to get people to change from driving to walking and cycling.
- Objective 8 – include active as well as sustainable travel. Objective 9 – could include health inequalities alongside deprivation.
- Current transport arrangements are piecemeal. There must be an integrated and sustainable transport strategy linking home, work, and leisure. Measures could include tram linking Northampton railway station to the University, Brackmills, Wootton, Grange Park and Northampton Gateway. Park and Ride and inner ring bus service. Better links to the Eastern District. Support community transport initiatives reduce air pollution and promote alternatives to vehicular transport. No further road building until a sustainable transport strategy is in place.

Parish/Town Council responses:

The following Parish and Town Councils supported the spatial objectives:

- **Blisworth Parish Council** (no comments)
- **Brackley Town Council** – Action needed to install more EV charging points. Commitment to more carbon neutral / electric passenger transport.
- **Braunston Parish Council**
- **Brixworth Parish Council** – Connectivity should include cycling and walking. Provision of charging points in new development and for public use.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Cold Higham Parish Council** - Should objective 9 also apply to rural areas?
- **Culworth Parish Council** (no comments)
- **Daventry Town Council** - If growth is to be based on logistics, then the development of employment areas must have good links to the development of residential areas for those employees via energy efficient transportation.
- **Evenley Parish Council** – Add reference to improving cycling in all areas.
- **Flore Parish Council** – To reduce travel distances there should be a drive to increase densities in urban areas. Sprawl and congestion in our urban centres mean people travel to centres further away.
- **Holcot Parish Council** – Build roads before the traffic arrives. Build in consultation with local communities.
- **Kingsthorpe Parish Council** – Investment in sustainable transport is essential.

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- **Kislingbury Parish Council** – Green spaces need to be made accessible by bus, walking, and cycling routes.
- **Little Houghton Parish Council** (no comments)
- **Long Buckby Parish Council** (no comments)
- **Old Parish Council** (no comments)
- **Silverstone Parish Council** – reference to cycle ways, footpaths and active travel routes should be included.
- **Syresham Parish Council** – Proposals show no connections between rural settlements, market towns and Northampton. More emphasis needed on sustainable rural transport including bus services and safe active travel.
- **Tiffield Parish Council** (no comments)
- **Woodford-cum-Membriis** (no comments)
- **Wootton Parish Council** (no comments)

The following Parish Councils objected to the spatial objectives:

- **A5 Alliance of Town and Parish Councils** - Objectives need to be strengthened. Connecting communities is crucial but the objectives lack vision. Rural transport needs to be prioritised and is currently poor in south Northants. Spatial options such as north-west Milton Keynes do not support the objectives. Objective 9 should also apply to rural areas.
- **Boddington Parish Council** – More emphasis on improving the quality of existing roads and more extensive bus services for rural areas.
- **Braunston Parish Council** – Should include ‘rural public transport’. Support for high-speed internet access in rural areas should be included.
- **Bugbrooke Parish Council** – More detailed measurable objectives are needed.
- **Cosgrove Parish Council** – Objective 9 should apply to rural areas.
- **Crick Parish Council** – Objectives are not driving the development options such as 3a and 3b. To achieve objective 8 employment should be within existing urban areas and not adjoining the M1. Objective 9 would be supported by urban regeneration, but this is absent from the plan.
- **Deanshanger Parish Council** - Rural transport needs to be prioritised and is currently poor in south Northants. Spatial options such as north-west Milton Keynes do not support the objectives. Objective 9 should also apply to rural areas.
- **Easton Neston Parish Meeting** – There is an infrastructure deficit and planning proposals are increasing road traffic massively.
- **Hinton-in-the-Hedges Parish Meeting** – This section is about urban communities. How are rural communities being covered?
- **Moulton Parish Council** - When was the business case for building and/or altering the roads serving this area? The bus network has diminished in recent years damaging the opportunities for improving connectivity. In order to accommodate the inevitable increase in car usage, Northampton needs to consider Park & Ride locations.

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- **Nether Heyford Parish Council** – There needs to be an objective around increasing the use of public transport.
- **Old Stratford Parish Council** – Objective 9 must apply everywhere and not just in urban areas.
- **Overstone Parish Council** – Infrastructure before development. Strategic plans needed for Roads, Green Spaces, Health, and the impact of the pandemic.
- **Potterspury Parish Council** – Objectives are modest and lack vision. Objective 9 should apply everywhere.
- **Walgrave Parish Council** – rural areas are currently suffering from poor roads, congestion, traffic safety issues and poor public transport. Better roads and public transport are needed before any new development.
- **Weedon Parish Council** – Weedon is thriving due to its connectivity but our ‘sub regional centre’, Daventry is a mess. Improved public transport connections are suggested.
- **Welton Parish Council** – Until public transport is readily accessible this objective will not be achieved.
- **Whittlebury Parish Council** – Objective 9 should apply anywhere, not just urban areas. The proposal needs clarity and focus on sustainable transport.
- **Yardley Gobion Parish Council** – Objective 9 should apply to anywhere. Objectives not reflected in option 5b. There is no integrated public transport plan just more cars.

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Blakesley Parish Council** – Objective 9 should apply everywhere, not just in urban areas.
- **Greens Norton Parish Council** – Objective 9 should apply anywhere, not just to urban areas.
- **Ravensthorpe Parish Council** – Plans for separating future employment and housing development will make the aim of reducing the need to travel difficult to achieve.
- **Rothersthorpe Parish Council** – The vision is fair in principle but falls short of guaranteeing the delivery of ‘multi-modal’ infrastructure.
- **Towcester Town Council** – Objective 9 should apply to all development, not just urban.

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Question 5: Are the spatial objectives 10 to 12 – Thriving Villages and Towns – appropriate for guiding development and growth in West Northamptonshire?

- 239 respondents said ‘Yes’
- 365 respondents said ‘No’
- 450 respondents provided specific comments

Those who supported the spatial objectives made the following key points:

- Designing out crime cuts down and permeability and can promote increased car use.
- Affordable housing is rarely of high-quality design.
- Objective 10 should say how the regeneration of town centres will be supported and consider new approaches to development within town centres such as the development of new urban living opportunities.
- Objective 11 should include adaptable housing so residents can stay in their homes when circumstances change e.g., reduced mobility.
- Objective 12 lacks detail and should be a priority objective given the rural nature of much of WNC.
- Careful management is needed of the space surrounding villages to maintain their identity.
- The strategy of relying on a small number of large sites has failed to deliver sufficient housing, especially affordable housing.
- Spread rural housing and the benefits of development across the area rather than large developments in urban areas. There should be an allowance for limited housing growth in villages which is consistent with their character. Limited growth will enable rural amenities to survive.
- Development should be focussed in areas with good infrastructure.
- Greater emphasis required on the regeneration of Northampton and brownfield sites.
- Northampton town centre is very poor for the size of the town. Northampton needs an imaginative vision for 2050 to provide a positive hub for retail, community, relaxation, and entertainment. No mention of Northampton’s bid for city status.
- Affordable housing is critical for young people.
- The importance of bungalows should be highlighted in objective 11.
- Supporting the regeneration of town centres is a good objective but the lack of public transport and parking in Brackley works against this.
- A number of respondents seek to demonstrate that particular development options would support the objectives.
- Retro fitting of existing developments should be included to make them sustainable.
- The plan needs to guide development that will best support the regeneration of town centres.
- Development should be in keeping with landscape character including use of local materials.
- Objective 11 should specifically refer to meeting housing need.

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- Further public engagement required to complete the vision for Daventry town centre.
- Greater engagement required with rural communities.
- The role of arts and culture in supporting town centres should be recognised.

Those who objected to the spatial objectives made the following key points:

- Insufficient detail provided on how rural areas will be supported and thrive. What do thriving and remaining vital look like? Such communities need a wider range of housing and population growth to support services.
- A number of respondents consider that the spatial options do not support the objectives. Specific examples include south of Towcester, Long Buckby, north of Northampton (Boughton and Moulton), east of Northampton (Ecton), south of M1 junction 15a, north-west Milton Keynes / Old Stratford, south of Market Harborough (East Farndon), north and west of Daventry, the expansion of DIRFT,
- Objective 11 should include an assessment of the adequacy of existing housing.
- There should be a wide choice of housing for sale and rent including housing for older people, and affordable housing.
- Some housing growth should be supported within the ‘envelope’ of rural communities, but this should be proportionate.
- The objectives are generic and could apply to any area.
- Measurable targets are required.
- Affordable housing needs to be genuinely affordable.
- A meaningful proportion of affordable housing (50%) should be secured.
- Objectives are weak and should link to the green vision and objectives.
- Not all town centres need regeneration.
- Specific measures should be put in place to maintain the character of rural communities including the design of new development.
- The traditional view of town centres is dead. There is a clear need to radically rethink the role of our town centres with opportunities for significant mixed-use development.
- Housing need estimates are too low with insufficient affordable housing.
- Communal energy sources and leading examples of refuse sorting should be considered for developments.
- More is needed to address rural poverty with better public transport and access to health and wellbeing services. Free transport needed for young people to enable them to access education, health, and leisure services.
- WNC is towing the government line and not meeting the needs of local people.
- Objective 12 is shamefully undeveloped.
- Objective 10 – democratic structures are required to ensure that residents and the users of town centres play a leading role in their development.
- Scepticism that the objectives will be achieved.

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- Housing estates of the future should have parcel/delivery hubs as essential infrastructure.
- Rural communities should be protected rather than being surrounded by housing and warehouses. Existing green space and wildlife ecosystems should be preserved to protect the character and setting of villages, particularly those that are near Northampton. There should be specific protection from coalescence. Clear boundaries should be set for the expansion of towns.
- Focus on the regeneration of brownfield sites, particularly in Northampton.
- Objective 11 should set the scene for and drive housing growth policies.
- Objective 12 should support sustainable growth in rural areas through Neighbourhood Plans and a Site Allocations Plan.
- Objective 11 should recognise the importance of delivering an appropriate range of family sized housing.
- The planning process in WNC does not currently support the delivery of housing to meet the needs of all sections of society.
- Concern that large housing estates can attract crime and anti-social behaviour.
- A specific policy on design should be included setting out criteria against which planning applications would be considered. This could include design quality tools such as building for a healthy life (BHL) which has been adopted by Homes England.
- Priority should be given to creating local employment opportunities close to homes rather than out of town industrial parks which generate the need to travel.
- Should recognise the opportunity provided by the Oxford-Cambridge Arc to deliver transformational growth.
- It would be good to see some proposals for protection of heritage spaces for tourism in villages as well as bigger urban areas
- More emphasis needed on social cohesion and the social structure that is planned for new communities.
- Proposals are not consistent with the levelling up agenda.
- Objective 10 fails to recognise the impact of Class E in the Use Classes Order.
- Objective 11 should refer to local distinctiveness.
- Objective 12 should include ‘accessible by public transport’.

Other comments made by respondents who did not specify ‘yes’ or ‘no’:

- Small scale developments of retirement homes would enable older residents to live within their existing communities.
- Robust sustainability goals are needed for domestic and commercial property to meet carbon neutral targets
- Brownfield sites should be prioritised.
- Objectives 10-12 are not fit for purpose and fall into the ‘sustainability trap’ referenced in the Taylor Review 2008. Some rural settlements would benefit

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from meaningful housing growth to support affordable housing and investment in social capital.

- Changing in working practices post Covid may result in the need for services and facilities to be provided more locally outside of town centres.
- Objective 12 does not reflect the significance of rural areas and should be expanded to reference their social, economic, and environmental roles.
- Reference to heritage in objective 10 is welcomed.
- Concern regarding the impact of housing in multiple occupation (HiMOs) in Northampton. Concerns include the loss of family housing, the size and quality of the units created and the adverse impact on the conservation area and historic buildings.
- Objective 11 should refer to the role that larger villages can play in accommodating sustainable growth.
- Developer led model over the last 20 years has failed to deliver the right number and mix of housing, especially affordable housing. The balance between public and private sector needs to be reset, with WNC taking a lead role in development and planning.

Parish/Town Council responses:

The following Parish and Town Councils supported the spatial objectives:

- **Blisworth Parish Council** (no comments)
- **Brackley Town Council** (no comments)
- **Braunston Parish Council** – no changes proposed.
- **Brixworth Parish Council** – Town centres should be more ‘mixed use’. Developments should offer a wide range of dwellings from first time buyers through to housing for older people and to meet special needs. Rural areas need protection, but some proportionate growth is required.
- **Bugbrooke Parish Council** – The objectives feel aspirational and have not been delivered in the past. The villages around Northampton need to be kept rural and protected from expanding development such as Panattoni Park.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Cold Higham Parish Council** (no comments)
- **Culworth Parish Council** (no comments)
- **Daventry Town Council** – investment has to be made in the village/town to invite and welcome residents to support their local economy.
- **Evenley Parish Council** – Objective 11, add reference to high quality build standards. Objective 12 is very weak. Add references to the distinctive character of villages – social, economic and built environment.
- **Flore Parish Council** – Objective 12 should support Neighbourhood Plans.
- **Hinton-in-the-Hedges Parish Meeting** – more explanation of ‘how to protect rural communities’ is required.
- **Holcot Parish Council** – Affordable housing is critical for young people.
- **Kingsthorpe Parish Council** – Strategy to encourage people to come into town. Discourage gambling licences.

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- **Kislingbury Parish Council** - Housing ‘wants’ rather than housing ‘needs’ are being met. Meeting housing need means that West Northants residents would live in homes that they can afford, are warm and dry, green and fuel efficient, and enable children and families to flourish. To enable real housing need to be met, there should be construction of homes available on a variety of tenures including shared ownership. The use of Community Led and not-for-profit housing initiatives needs to be prioritised to address the needs of residents whose housing needs will never be met in a market-led context.
- **Old Parish Council** – Should reference climate change resilience. Housing should not swamp the countryside and existing communities. Consider initiatives such as the National Forest as part of regeneration strategy.
- **Overstone Parish Council** – Housing design to reflect the character of local areas. Rural area objective is too vague. More affordable housing needed along with clear plans for sustainable villages.
- **Silverstone Parish Council** - Yes and no. Supporting town centres is ok but what about keeping alive and reviving village centres in larger villages? Increased affordable housing and council homes – but what about other social housing providers?
- **Tiffield Parish Council** (no comments)
- **Walgrave Parish Council** – Housing plans to reflect the character of local areas. Affordable housing is key to inclusive communities. Good transport needed from rural areas to support town centres.
- **Welton Parish Council** – town centres need improved access and parking.
- **Woodford-cum-Membris Parish Council** (no comments)

The following Parish and Town Councils objected to the spatial objectives:

- **A5 Alliance of Parish Councils** – The objectives should set targets against which performance can be measured. Objective 10 – the aims are modest and delivery is questionable as there are no plans to regenerate brownfield sites. Objective 11 is at odds with the spatial options which are all on greenfield land. Objective 12 provides no detail on the strategy for bringing jobs and infrastructure to rural areas.
- **Cosgrove Parish Council** – The objectives state the obvious and should have targets against which success or failure can be judged.
- **Crick Parish Council** – The spatial options do not support the objectives. For example, options 3a and 3b will destroy the rural communities of Crick, Lilbourne and Yelvertoft.
- **Easton Neston Parish Meeting** – Objectives 10 and 12 are appropriate. Objective 11 should include reference to infrastructure being in place.
- **Hinton-in-the-Hedges Parish Meeting** – more explanation of ‘how to protect rural communities is required.
- **Little Houghton Parish Council** - Objective 12 – what exactly does ‘thrive and remain vital’ mean? Spatial Option 6 – Rural Areas contains the words ‘the level of growth needs to recognise the need to protect and enhance the special environmental and social characteristics of the rural area’. This

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captures the sentiment in a more meaningful way and Objective 12 should be amended accordingly.

- **Long Buckby Parish Council** - A thriving community should not be allowed to grow beyond the local economy's ability to support otherwise they simply become dormitories. This size limit should be incorporated in the plan.
- **Moulton Parish Council** - Villages and towns thrive as individual communities with their own pride and identity. Development of infill land as this proposes damages rather than reinforces that sense of community. There is a clear conflict of objectives.
- **Nether Heyford Parish Council** - Insufficient aspiration around rural villages. They need protecting from excess development and being subsumed into larger conurbations. WNC should provide more significant support for the development of Neighbourhood Plans. More funding required for rural areas to support assets such as street-lighting.
- **Old Stratford Parish Council** – The objectives state the obvious and should have measurable targets.
- **Potterspury Parish Council** – Objective 10 is welcome but aims are modest. Delivery is doubtful with no plans to regenerate brownfield land. Many of the potential development sites conflict with objective 11.
- **Wappenham Parish Council** - This is written to give 'excuses' to developments or large or inappropriate size in small towns or villages. To thrive a village does not necessarily have to grow and in fact growth can actually harm.
- **Whittlebury Parish Council** – Most of the objectives are laudable, but there is a lack of clarity. The objectives should set targets against which policy can be judged.
- **Weedon Parish Council** – Growth is threatening villages such as Harpole and Kislingbury. Traffic congestion is a disincentive for travel to Northampton. Daventry is not a thriving town or town centre. Poor development on the edge of towns has not helped. Villages like Weedon need more affordable housing.
- **Wootton Parish Council** – Objective 12 lacks detail and ambition. Limited development in villages has led to a loss of services and facilities. A regenerated town centre will need easy access and parking at reasonable rates. The environment needs to enhance the heritage and cultural assets together with other town centre uses.

The following Parish and Town Councils did not specify 'yes' or 'no':

- **Blakesley Parish Council** - should set targets against which success can be measured e.g., housing density and the provision of green space.
- **Deanshanger Parish Council** - Objective 12 provides no detail of how rural communities will be supported and protected. There is no strategy for bringing jobs and infrastructure to rural areas.
- **Ecton Parish Council** – WNC is expected to protect precious villages such as Ecton.

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- **Greens Norton Parish Council** – Should set targets against which success can be measured.
- **Rothersthorpe Parish Council** - Objective 12 gives no indication of the how the vision will be achieved. Spatial Option 1g south of M1 junction 15a is contrary to objective 12
- **Syresham Parish Council** - Key market towns need investment for regeneration, so residents of those towns and surrounding rural settlements are able to shop locally rather than travelling further to large shopping centres.
- **Silverstone Parish Council** - Yes and No. Supporting town centres is ok but what about keeping alive and reviving village centres in larger villages? Increased affordable housing and council homes – but what about other social housing providers?
- **Yardley Gobion Parish Council** - The objectives should set targets and give residents success and failure measures by which any good policy can be judged objectively.

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Question 6: Are the spatial objectives 13 to 16 – Economic Development – appropriate for guiding development and growth in West Northamptonshire?

- 225 respondents said ‘Yes’
- 337 respondents said ‘No’
- 351 respondents provided specific comments

Those who supported the spatial objectives made the following key points:

- Increased forestry could offset carbon emissions.
- Additional blue and green infrastructure and an improved rights of way network would have benefits for local residents and attract visitors.
- The approach to the Arc in Objective 13 is not consistent with the vision.
- Objectives should refer to the existing world class engineering, technology, and manufacturing industries.
- Should be clearer on the benefits offered by the Arc in terms of high-tech business and high paid jobs.
- Support further research on the supply and demand for logistics on a sub-regional scale.
- Objective 16 could reference existing initiatives to support tourism such as ‘Hidden Northamptonshire’. Would like to see more in the vision about tourism. The objective understates the importance of tourism.
- Employment areas should be near housing with facilities and infrastructure planned from the start.
- Northants struggles to attract visitors in comparison to surrounding areas such as the Cotswolds / Warwick and Stratford.
- Leaving the EU has created problems for specialist food producers.
- A number of respondents support the objectives and seek to demonstrate that a particular development proposal would help to achieve the objectives.
- Focus on high tech, low footprint economy not warehousing and distribution. Emphasise localism and local entrepreneurship and encourage alternative business models such as cooperatives and social enterprise. Encourage financial investment and support in newer green, ethical and cooperative start-ups. Be a living wage accredited working environment.
- Concern about the impact of the logistics industry in the area such as the loss of landscape and habitat, the carbon impact, and environmental impacts such as flooding.
- More detail required.
- Objective 13 – the claim that we are internationally well-placed is disputed
- Rather than low wage logistics, push for companies who deliver better employment contracts and higher wages.
- Northampton needs to be connected to mainline high speed rail services.
- Support the recognition of the economic advantage the area has and the benefits of the Arc. The plan should seek to maximise these opportunities.
- Support the recognition of clusters of specialised industries. Silverstone Business Park and Technology University are particular examples.
- Rural diversification should come first.

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- There are economic opportunities associated with the River Nene that could contribute towards West Northants. A waterspace study similar to those undertaken for Bedford and Peterborough could help stimulate the regeneration of the river corridor.
- Northampton and Daventry have the greatest employment need.
- A better integrated transport system is needed to support these objectives. Where is the rail connection to Oxford or Cambridge?
- Sufficient homes also need to be built to realise the economic benefits of the Arc.
- To support economic development further investment will be required in community policing and emergency response.
- WNC should recognise the significant role that the logistics sector plays in support the UK's economy. The importance of the sector will increase on the short to medium term. Objective 13 should mention DIRFT, the M1 junctions and the opportunities for growth.
- Much more could be done to attract tourism to Northampton given the town's history and wealth of monuments.
- Greater focus on development in the south of the area to support the Arc.

Those who objected to the spatial objectives made the following key points:

- A number of respondents argue that the spatial options do not support the objectives. Specific examples include south of Towcester, land south of M1 junction 15a, north-west Milton Keynes / Old Stratford, north and west of Daventry, north of Northampton (Boughton / Moulton), east of DIRFT, east of Northampton (Ecton), south of Long Buckby.
- Too much emphasis on logistics development which will bring heavy traffic for little employment gain. Question the need for further logistics development in the area.
- Greater emphasis needed on high quality jobs in green industries and the digital economy. The potential for a more decentralised economy should also be considered. Development of small businesses and craft skills hubs has been missed.
- Remove reference to the Ox-Cam Arc which has a very uncertain future. Too much emphasis given to the Arc. Northampton is unlikely to play a key role in the Arc given the lack of connectivity to Oxford or Cambridge.
- Not detail on how employment will be attracted. How will a diverse range of jobs be delivered?
- Objectives 14 and 15 should include rural areas.
- Focus on maintaining and building on existing strengths rather than seeking to diversify.
- Greater focus on brownfield sites rather than greenfield development. Greater emphasis on regeneration of existing urban areas. Should maximise the use of existing employment sites. Small and medium scale employment uses should be supported.

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- Objectives 15 and 16 could have adverse impacts on agriculture and disrupt natural areas. Farming is undervalued in Northants. Further support is needed for farming communities.
- WNC should preserve assets such as ancient monuments and conservation areas which help to attract visitors.
- Objectives do not recognise the impact of Covid 19 and the change in working practice. For example, Objective 15 does not reference the positive impact that home working can have on the economy in rural areas. Will office space be required?
- Objective 16 – the large-scale development proposals will not support tourism.
- Creating a high-quality environment is essential to take advantage of our position in the Ox-Cam Arc.
- Timing of the consultation in advance of any plan for the Arc is questioned.
- Scepticism that the objectives can be achieved.
- Current road networks around Daventry do not support further development.
- Objectives 13 to 16 do not promote the flexibility necessary for businesses to respond to rapidly changing market circumstances.
- An additional objective is required which supports the conditions in which business can invest, expand, and adapt in changing circumstances.
- A specific objective should be included to make provision for storage and distribution uses at a variety of scales. The 20ha threshold is not supported or justified.
- Employment opportunities should be closely related to housing. The proposals for Northampton do not achieve this.
- More emphasis on infrastructure improvement needed.
- Opportunities for economic growth should not be maximised to the detriment of the countryside.
- There is nothing in the proposals that drives the economic growth of Northampton. The town should leverage its shoe, footwear, and leather heritage to become a major centre of that nature and a catalyst for wider regeneration.
- Economic growth needs to be caveated to ensure it is in line with net zero targets.
- Objectives unlikely to be achieved in the Daventry area. The amount of money required to support transport links and infrastructure is unlikely to be realised.
- Objectives 13 and 16 are mutually exclusive in that ugly economic development will reduce tourism.
- Stronger protection required for the landscape and assets such as the canal network.
- Objectives are vague and lack firm commitments.
- Our pretty villages between Daventry, Brackley and Towcester provide an alternative “Cotswolds” and could provide much tourist income, our canal

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network should be celebrated, and our extensive heritage and history made accessible.

- Scepticism that WNC can deliver the objectives.
- Why are employment sites identified in South Northamptonshire when the HENA suggests there is a surplus?
- There needs to be recognition of the relationship between Northampton and economic development in the corridor of Wellingborough, Kettering, and Corby.
- Language is too passive. There should be a focus on making existing businesses such as high-performance engineering and logistics greener.
- A rail link from Northampton to Bedford would provide better links to the Ox-Cam Arc.
- A proper orbital route is required to the north and west of Northampton.
- Options should take best advantage of the strategic transport network, particularly rail. Daventry is not an appropriate location in this respect.
- Focus on the M1 is misplaced. This is an air-polluting, carbon, lorry, and car generating visual and aural eye/ear sore. Emphasis should be on sustainable growth.
- Opportunities to make better use of existing railways and to reopen former routes and stations would be transformational. A new rail and bus strategy should be a key priority.
- Growth driven by WNC's location on the strategic road network needs to be carefully controlled. Sites such as DIRFT and the M1 corridor should be considered to be at capacity.

Other comments made by respondents who did not specify 'yes' or 'no':

- Both logistics and high-tech development should be encouraged. Logistics should be focussed on rail connections and key motorway junctions
- Employment sites should be close to population centres and encourage active travel.
- Out of town shopping centres should not be approved.
- Objectives 13, 14 and 16 should reference Silverstone Park and the wider technology cluster and its importance for economic development, specialist business and the visitor economy. A positive policy framework is required to support continued growth.
- It is not explained how the Oxford Cambridge ARC can benefit West Northants which will only be on the periphery of it. It will lead to greater housing requirements but not necessarily employment or improvement to the local economy as residents could just be commuting to MK etc.
- Reference to heritage within Objective 16 is welcomed. However, it would be helpful to include reference throughout.
- It is unclear whether the impacts of Covid 19 and the likely reduction in the need for office space has been considered.

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- Support objective 13 but strongly object to the findings of the Housing and Economic Needs Assessment which would fail to deliver the aspirations for economic growth.
- Sustainable housing growth is required to support economic development in rural areas.
- Effective rural broadband is essential.

Parish/Town Council responses:

The following Parish and Town Councils supported the spatial objectives:

- **Blisworth Parish Council** (no comments)
- **Brackley Town Council** (no comments)
- **Braunston Parish Council** – Objective 15 should seek to minimise the loss of best and most versatile agricultural land by maximising the use of brownfield sites and lower grade land.
- **Brixworth Parish Council** - Employment areas are needed. Concern that the options identified are road based. Clusters encouraging artisans and smaller businesses should be catered for, especially in rural settings
- **Bugbrooke Parish Council** – Support the objectives but these don't reflect the plans for large warehousing sites.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Cold Higham Parish Council** – wording of objective 15 is vague and open to interpretation.
- **Culworth Parish Council** (no comments)
- **Daventry Town Council** - Road network, investment in new technologies is key to growth. Rural diversification objectives will contradict economic development objectives they need to be considered separately to ensure the aims are focussed and work in tandem with the other to ensure one objective doesn't take precedence over the other. Visitor economy although feeding into the economic development within West Northamptonshire, should also be a separate objective.
- **Evenley Parish Council** – Add reference to high-speed internet provision to support homeworking.
- **Flore Parish Council** – Diversifying our economy is difficult in the face the increasing concentration of logistics in the area. Extensive warehousing development does little to support the visitor economy.
- **Holcot Parish Council** – Agree with the exception of 'internationally well-placed location'. Joined up plans need to be developed.
- **Kingsthorpe Parish Council** – Objectives 14-16 more critical.
- **Kislingbury Parish Council** - The logistics-led development that has occurred along the M1 corridor, despite local opposition has, presumably, made large profits for the businesses involved but it has created employment that is unskilled, insecure (zero contracts and agency work) and low paid. This makes it harder for people to afford houses locally. The residual requirements for economic (employment) need should be carefully focused and aligned with

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the developing West Northants Anti-Poverty Strategy to develop to the greatest extent possible, well paid, permanent, and satisfying work.

- **Little Houghton Parish Council** (no comments).
- **Long Buckby Parish Council** (no comments).
- **Nether Heyford Parish Council** (no comments)
- **Old Parish Council** – strengthening the local economy should not mean building lots of warehousing that stands empty for years.
- **Tiffield Parish Council** – the plan should show how WNC will support farming.
- **Welton Parish Council** (no comments)
- **Woodford-cum-Membris Parish Council** (no comments)
- **Wootton Parish Council** (no comments)

The following Parish Councils objected to the spatial objectives:

- **A5 Alliance of Parish Councils** - Should be more explicit in naming the target industries. The strategy should aim to provide high quality green jobs and jobs in the digital economy. Diversity in our economy is welcome, but there is a lack of direction in these objectives. Reliance on the Oxford-Cambridge Arc could be misplaced.
- **Cosgrove Parish Council** - The Plan could be more explicit in naming some of the target industries. It is clear that Logistics and High-Performance Engineering, (which centres on Motor Sport) are some of the key industries to retain and attract but this needs to be made MUCH clearer.
- **Crick Parish Council** – the objectives are not driving the development options. The options for the expansion of DIRFT will not diversify the economy (Objective 13) will decimate local agriculture (Objective 15) and will not support the visitor economy (Objective 16).
- **Easton Neston Parish Meeting** – Objectives 13,14 and 16 are appropriate. Objective 15 should show how WNC will support farming.
- **Greens Norton Parish Council** - The Plan could be more explicit in naming some of the target industries. It is clear that Logistics and High-Performance Engineering, (which centres on Motor Sport) are some of the key industries to retain and attract but this needs to be made clearer.
- **Hinton-in-the-Hedges Parish Meeting** – Should explain why economic growth is needed. Should seek to limit the impact of the Arc on rural WNC. Objective 14 should specify that ‘clusters’ should be ‘in sustainable areas’
- **Moulton Parish Council** – The former Daventry District appears to be taking the brunt of development which will add to the residential burden but do nothing to assist economic development.
- **Old Stratford Parish Council** – The Plan could be more explicit in naming some of the target industries. It is clear that Logistics and High-Performance Engineering, (which centres on Motor Sport) are some of the key industries to retain and attract but this needs to be made clearer.

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- **Overstone Parish Council** – Northampton is on the edge of the Arc and in no better location than other towns and cities. Vastly improved infrastructure is required.
- **Potterspury Parish Council** - A diversity of our economy would be welcome. Unfortunately there is no detail or an indication which direction this will take. Some indication as to how the town centres will be regenerated would be welcome. Presuming initiatives will emerge post-Covid, what will be their focus? There is a clear lack of direction in these objectives and the reliance on the Oxford Cambridge Arc could be misplaced.
- **Walgrave Parish Council** - What are the plans to ensure that our villages retain economic advantage and business development? To enable the rural and visitor visions to be achieved we need vastly improved infrastructure.
- **Weedon Parish Council** – refer to objections to the HENA set out in question 7.
- **Whittlebury Parish Council** - The Plan could be more explicit in naming some of the target industries. It is clear that Logistics and High-Performance Engineering, (which centres on Motor Sport) are some of the key industries to retain and attract but this needs to be made clearer.
- **Yardley Gobion Parish Council** - The Plan could be more explicit in naming some of the target industries. It is clear that Logistics and High-Performance Engineering, (which centres on Motor Sport) are some of the key industries to retain and attract but this needs to be made clearer.

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Blakesley Parish Council** - Should be a little more explicit in naming some of the target industries. Logistics and high-performance engineering (centre around motorsport) are some of the key things to retain and attract. Promote Northampton Waterside Enterprise Zone home to high performance tech and automotive e.g., Cosworth and MAHLE Powertrain.
- **Greens Norton Parish Council** - The Plan could be more explicit in naming some of the target industries. It is clear that Logistics and High-Performance Engineering, (which centres on Motor Sport) are some of the key industries to retain and attract but this needs to be made clearer
- **Rothersthorpe Parish Council** - concern that objective 15 could have negative impacts on local farmers and tenant farmers. Objective 16 – Land south of junction 15a would disrupt assets which attract visitors such as the Grand Union Canal conservation area.
- **Silverstone Parish Council** - Yes and no. What about building on our existing expertise such as in high performance engineering/motorsport. There is reference to supporting and developing opportunities for specialist employment clusters (this exists at Silverstone) but not all focused on a low carbon economy. We must not forget traditional ways completely. Sports should be included here with not only Silverstone but rugby, cricket, and football amongst others. There is no mention anywhere about the canals.

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Question 7: Do you agree that the findings of the HENA reflect the housing and/or economic needs of the area?

- 132 respondents said 'Yes'
- 437 respondents said 'No'
- 440 respondents provided specific comments

Those who supported the findings of the HENA made the following key points:

- We note that the proposed strategy is to meet the housing need as calculated using the standard method and also to allocate employment land to meet the calculated unmet need. We support this approach and have no further comments to make at this stage.
- HENA rightly identifies that warehousing is likely to attract in commuting from other areas.
- Agree that the HENA identifies the minimum needs but an uplift needs to be considered in response to the Arc.
- Co-location of housing and employment to reduce the need to travel.
- Northampton is the area of greatest need and should be the focus for new housing. This would be consistent with the city status bid.
- In considering employment needs WNC should consider the opportunities that arise from existing employment sites such as Silverstone.
- The HENA will need to be updated in the light of the Arc Spatial Framework and up to date economic forecasts.

Those who objected to the findings of the HENA made the following key points:

- The HENA does not adequately reflect the aspirations of the emerging Oxford-Cambridge Arc Spatial Framework. The employment land figure does not address the need for transformational growth in the Arc.
- A number of respondents question whether the HENA justifies the specific spatial options which have been identified and are concerned about the impacts of the development required to meet the levels of need identified. These include south of Towcester, North-west Milton Keynes / Old Stratford, M1 junction 18 / DIRFT expansion, north and west of Daventry, north of Northampton (Boughton and Moulton), south of M1 junction 15a, east of Northampton (Ecton).
- Concern that the location of the spatial options does not relate to the local needs for housing and employment.
- The spatial options, especially in South Northants would result in a massive oversupply of land against the needs identified in the HENA.
- The housing need should reflect the shortfall in provision at Northampton, leading to a reduction in the planned growth in the former Daventry and South Northamptonshire areas.
- Unclear how the housing and economic development needs will be met.
- A number of respondents dispute the validity of the standard method for calculating housing need. The population projections are 2014 based may be

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inaccurate given the impacts of Brexit and Covid. The formula continues the disproportionate growth that has occurred over the past 20-30 years. Housing need is overstated when compared to ONS figures showing declining fertility rates and reduced numbers of overseas workers. Need to factor in increased homeworking and the impacts of climate change. The findings are speculative. The adjustment for affordable housing results in a projection of need which is larger than required. The calculation is based on achieving the government's target for 300,000 homes per annum which is unsubstantiated. Requiring more houses to be built does not improve affordability and suppress prices.

- Concern that too many large 4-5 bed homes are built in the Daventry area.
- Allocation of office space in Northampton is very low considering bid for city status
- It is unclear how the identified housing numbers link to rates of population growth across WN and through to the spatial options – how much housing is needed by area linked to expected population growth and do the spatial options reflect this?
- The relationship between housing and warehousing may be inaccurate. Job numbers are likely to fall, and rates of pay are low meaning affordable housing is needed.
- The work to identify the strategic need for warehousing needs to be completed. There is substantial evidence of a shortfall in supply and significant demand which is not being met.
- A number of respondents are seeking increases in the housing need figures. The reasons for this include; application of a 5% buffer to increase choice, to support the aspirations of the Ox-Cam Arc, to address the worsening affordability ratios, to meet and support the baseline economic growth forecasts, to meet jobs growth associated with developments such as Northampton Gateway, to take account of existing growth rates in the Joint Core Strategy, the Arc related option included in the Issues consultation, should use 2021 figures which have increased affordability ratios, past under delivery highlights the need for contingency and flexibility, to meet the government's objective to significantly boost the supply of housing. The HENA would perpetuate declining affordability and increase net commuting. The basis for the windfall allowance is questioned. Various figures are suggested as follows: 2,389 dwellings per annum, 47,303 dwellings (as opposed to the 30,000 currently proposed), a 20-25% uplift as proposed by the Aylesbury Vale Inspector, a 20% flexibility allowance as recommended by the Local Plans Expert Group (2016), between 37,816 and 44,332 dwellings (depending on the extent of the contingency buffer), a minimum 10% uplift.
- A number of detailed technical comments are raised in respect of the HENA and the Housing Background Paper these include the need for greater clarity on what constitutes existing supply, dispute the windfall allowance, further evidence needed to justify assumptions regarding the reemployment of those who lost jobs during the pandemic, contingency figures should apply to the total housing requirement.

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- The need for employment land should be considered on a plan wide basis rather than as the sum of the three former council areas.
- Decisions should be made by people affected by developments.
- There should be no reliance on the Oxford-Cambridge Arc for housing needs. Northampton is unlikely to benefit from the Arc and the justification for growth associated with it is disputed.
- Simply increasing the number of houses to be provided is unlikely to improve affordability. Genuinely affordable housing is required rather than more ‘market led’ 4-5 bed detached houses. Smaller houses and apartments are needed.
- There is too much uncertainty in these figures, and they reflect more accurately MK’s needs than the broader area of West Northants.
- The HENA does not adequately consider the impacts of the pandemic and Brexit.
- An update of the HENA is needed to support the draft plan to reflect the latest growth forecasts and jobs figures.
- The employment need identified in the HENA is not sufficiently ambitious and does not reflect the government’s aspirations for the Arc. A figure of 48ha will severely constrain growth within this strategically important location.
- HENA may need to accommodate overspill from neighbouring councils.
- A number of respondents raise detailed technical comments regarding the employment aspects of the HENA. These include failure to consult stakeholders, failure to understand wider needs and the area’s role in the ‘Golden Triangle’, failure to consider structural changes post pandemic and Brexit, reliance on out of date and pessimistic forecasts, inconsistencies and errors in calculations, failure to acknowledge losses of employment land, fails to assess the sub-regional need for strategic warehousing. The Experian forecasts do not factor in strategic logistics. If the actual level of demand over the past 13 years is projected forward to 2050 the need would be 875ha. The use of inconsistent data sources, timeframes and methodologies, flawed assessment of housing needs not aligned with employment need, and inadequate commercial market assessment. The industrial needs are stated as being 203.4ha for 2020-50 and reducing this to achieve the balance of 47.62ha, by simply deducting the perceived supply of industrial land, is overly simplistic
- Little or no account of an ageing population and their needs. If older people were encouraged to downsize the number of new homes could be reduced by 75%
- The data is confusing and not properly explained.
- The surplus of industrial land in South Northants should be taken into account in the consideration of warehousing.
- The basis of the HENA is fundamentally flawed and should be challenged. The HENA does not consider alternative scenarios or variation in outcome.
- The housing need figures are too high, especially for South Northants. They represent an unsustainable growth in population and migration.

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- Some concern that a separate office component has not been identified for the former Daventry area.
- Northampton has grown rapidly and is now at capacity in terms of services and transport infrastructure.
- There should also be consideration of environmental sustainability, economic and social infrastructure. Not just housing numbers.
- Priority should be given to the use of brownfield land to meet the housing and employment needs which have been identified.
- The need for offices and warehousing is too high having regard to the impact of Covid and the existing supply of warehousing across the area. Growth and location of warehousing is a major concern. Demographic change means that less employment land is required. The proposals in the plan will drive inward labour migration.
- Housing should be built to the highest ‘green’ standards and supported by social facilities.
- Consultation is premature in the absence of work to assess requirements for strategic logistics and the potential for new settlements. It may also be prudent to wait for the results of the 2021 census.
- Demand for housing associated with DIRFT is being met by large development in Rugby Borough. This should be considered.
- The picture used to support this section is a very poor example of a new housing estate.
- The plan making process should include a locally based assessment of housing need to which communities can easily engage with and which will consider the issue of capacity.
- Trying to predict housing needs up to 2050 is unreasonable. A shorter time period should be considered.
- Given that the unmet need for employment land is 48ha, it is not clear why so many potential employment sites have been identified. This could lead a significant oversupply.
- To reduce reliance on large strategic sites, the plan should allocate smaller sites in the towns to maintain a five-year land supply and protect the rural areas.
- The lack of need for intermediate affordable housing products identified in the HENA does not reflect demand reported by registered providers. Intermediate products boost choice and can help viability to support the delivery of affordable rented housing.

Other comments made by respondents who did not specify ‘yes’ or ‘no’:

- As the housing need element is prescribed by a national formula in the NPPF it is difficult to suggest an alternative. Concern that the formula produces a disproportionate number of dwellings which are likely to be above the locally derived need for West Northamptonshire.
- It is a matter of concern that the standard method prescribed by national policy, the HENA, does not take account of the local environmental capacity.

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- Concern that the housing needs estimates are too low.
- The use of figures for the former Council areas in the HENA causes confusion.
- A strategic plan for 35 years should start with serious consideration, drawn from across industry and commerce, as to what is needed to encourage new jobs to be created in a way which meets the need to reduce transportation and consumption.
- The plan does not currently address the requirements of particular business sectors or clusters, such as the high performance and technology sector. A positive policy framework is required to support sites such as Silverstone.
- The HENA demonstrates the acute shortfall in affordable housing especially in the rural areas of South Northants.
- There is minimal discussion about the duty to cooperate and potential requirements to meet unmet need from neighbouring councils.
- Any policies relating to accessible and wheelchair user dwellings need to be applied flexibly.

Parish/Town Council responses:

The following Parish and Town Councils supported the findings of the HENA:

- **Blisworth Parish Council** (no comments)
- **Culworth Parish Council** (no comments)
- **Kislingbury Parish Council** (no comments)
- **Long Buckby Parish Council** (no comments)
- **Nether Heyford Parish Council** (no comments)
- **Silverstone Parish Council** – Yes, but question whether new thinking is required now there is one council. Further information required regrading existing commitments and action to reduce the time taken to commence and complete permitted developments. The type of housing provided will influence the number of residents they will house.
- **Woodford-cum-Membris Parish Council** (no comments)

The following Parish Councils objected to the findings of the HENA:

- **A5 Alliance of Parish Councils** - Unfortunate that economic needs are still assessed across the former Council areas. Information on the plans for identifying warehousing need and how these will be accommodated is required. The population data is confusing and difficult to compare. The statistics on affordable housing are not clear and open to interpretation. The plan does not provide a target population for 2050. Question whether the housing numbers required have been calculated correctly.
- **Brackley Town Council** - Projections of growth should be supplemented with targets or descriptions of suitable population levels.
- **Braunston Parish Council** - would welcome more explanation of the basis of modelling and how employment and housing needs have been coordinated to reduce travel and thus carbon footprint.

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- **Cosgrove Parish Council** - This vision does not set out what the target population West Northamptonshire wishes to see by 2050. Without this we are asked to trust the Council that it has calculated the nationally required housing numbers in the correct way. As there is now one Council and given that Joint Core Strategy has been in existence for a number of years it is somewhat disappointing that there is NO common standard method across the whole area.
- **Daventry Town Council** – the type and supply of housing needs to reflect needs to reflect the employment demographic. Can existing or future warehousing be adapted to accommodate changing demands such as a reduced reliance on goods manufactured overseas?
- **Easton Neston Parish Meeting** - the findings of HENA do not reflect the housing and economic needs of the area. There are fundamental errors which make the conclusions incorrect.
- **Flore Parish Council** – More effort is needed to attract employment in high quality offices and manufacturing rather than relying on warehousing. Growing need for housing for older people, built to lifetime homes standard.
- **Hinton-in-the-Hedges Parish Meeting** – No evidence of unmet need. Dispute the need for warehousing. Does natural growth support the numbers proposed or are we encouraging people to move to the area?
- **Holcot Parish Council** – The HENA should be redone to take account of the other spatial objectives, the rise of home working, and the impacts of climate change.
- **Kingsthorpe Parish Council** - Prefer more affordable housing rather than build to rent by private landlords.
- **Little Houghton Parish Council** – More work needs to be undertaken to justify the need for 30,000 additional homes.
- **Milton Malsor Parish Council** – The predictions that underpin the standard method have been shown to be inaccurate. The growth projections for 2016 and 2018 are much lower than the 2014 based projections. Impacts of Covid and Brexit mean that population growth will be lower. Seeking to plan over a 30-year period is likely to result in miscalculation and potential over development.
- **Moulton Parish Council** - This shows a simple arithmetic progression and appears to propose straight line increased development for the next thirty years. This is a simplistic assumption based on no published evidence and is unreasonable and unobtainable.
- **Old Parish Council** – Both figures seem excessive and will lead to a loss of land to development. Concern that the area is seen as an easy target for London overspill, and that development is not related to the needs of the local population.
- **Old Stratford Parish Council** - This vision does not set out what the target population West Northamptonshire wishes to see by 2050. Without this we are asked to trust the Council that it has calculated the nationally required housing numbers in the correct way. As there is now one Council and given that Joint Core Strategy has been in existence for a number of years it is

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somewhat disappointing that there is NO common standard method across the whole area.

- **Overstone Parish Council** - Does the analysis take account of the large volume of vacant offices, shops, and warehouses in Northamptonshire.
- **Tiffield Parish Council** – The HENA does not reflect the housing and economic needs of the area. Future population growth is overestimated. The use of 2014 projections is incorrect. The calculation for affordable housing assumes it is provided in addition to mainstream housing which is incorrect. Population growth is in the over 60s which means future employment sites will experience a shortage in labour supply. The plan creates employment opportunities at the expense of established businesses and does not reflect the impact of Brexit on labour supply.
- **Walgrave Parish Council** – There is scope for review in the light of changes to the way we work and use our home environments over the last 18 months.
- **Weedon Parish Council** – More quality housing needed in Daventry town and small quality developments in villages. Better jobs for highly qualified workers would boost the economy and reduce out commuting. Concern about the impact that government's planning reforms may have and the opportunities for local people to comment on future changes.
- **Whittlebury Parish Council** - This vision does not set out what the target population West Northamptonshire wishes to see by 2050. Without this we are asked to trust the Council that it has calculated the nationally required housing numbers in the correct way. As there is now one Council and given that Joint Core Strategy has been in existence for a number of years it is somewhat disappointing that there is not a common standard method across the whole area. Office requirements are calculated differently for Daventry making comparison difficult.
- **Wootton Parish Council** – We need more information to be able to comment.
- **Yardley Gobion Parish Council** - The vision does not set out what the target population West Northants wishes to see by 2050. Now that there is one council and given that West Northants Joint Core Strategy has been in existence for many years, it is disappointing that there is not a common standard method across the whole area. The office requirements are calculated differently in Daventry area making comparison difficult.

The following Parish and Town Councils did not specify 'yes or 'no':

- **Blakesley Parish Council** - The vision does not set out what the target population West Northants wishes to see by 2050/ Without that we are asked to trust the council and GL Hearn that it has calculated the nationally required housing numbers in the right way.
- **Brixworth Parish Council** - Is the Council satisfied that the evaluation process is transparent and objective?
- **Bugbrooke Parish Council** - Other than the HENA data Bugbrooke Parish Council do not have any other evidence. However, it does show that South Northants has a surplus of Industrial buildings, and the council would like that

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considered when looking at warehousing that impacts the parish of Bugbrooke.

- **Cogenhoe and Whiston Parish Council** – development needs to respect village confines. Bungalows and affordable housing are needed.
- **Cold Higham Parish Council** – not qualified to answer.
- The stated shortfall in employment land is too low and the intention to undertake a study to establish the wider sub-regional needs for logistics is supported.
- **Evenley Parish Council** – do not have the expertise to comment.
- Potential changes to the standard method as outlined in the 2020 Planning White Paper may need to be considered.
- **Hackleton Parish Council** - How up to date is the assessment? Does it factor in the pandemic and Brexit? Will it be updated annually? Current allocated sites have progressed more slowly than anticipated which may indicate lower need than originally thought.
- **Potterspury Parish Council** – The lack of data available to the consultees makes it difficult to comment. Use of former council areas makes the figures confusing and difficult to compare. The statistics on affordable housing are not clear and are open to interpretation. Concern that developers could take advantage of this to reduce the level of affordable housing they provide.

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Question 8: Do you agree that there is potential for directing further development at Northampton, as the principal urban area, as of part the spatial strategy for West Northamptonshire?

- 412 respondents said 'Yes'.
- 202 respondents said 'No'.
- 458 respondents provided specific comments

Those who supported the potential for directing further development at Northampton raised the following key points: (These are grouped under headings for ease of reference)

Spatial ambitions & structure:

- Plan should be seeking city status for Northampton and additional planned growth at Northampton will support this achievement.
- Development should build more towards Daventry; you can't just keep lumping everything into Northampton Town area. Support the identification of Daventry as a sub-regional centre.
- A continuation of previous growth strategies whereby the majority of development is concentrated on the main settlements and development elsewhere is significantly constrained should not be taken forward in this plan. This long-standing approach has resulted in severe pressure on infrastructure in these areas which has not been enhanced to a level to support the increased population.
- The housing allocations surrounding Northampton make a vital contribution to providing the much-needed homes for the town's growing population and as a Principal Urban area for Northamptonshire.
- Option needs promote sustainable growth to meet the needs of the area, align growth and infrastructure and improve the environment and mitigate climate change.
- Several factors make an extension to Northampton viable. Rail, road links already established as is the public transport system. Brownfield sites and existing empty properties. Better job opportunities.
- Northampton represents in excess of 50% of the county's population, demand from growth must surely be better sited in and around that area to grow the town into a city rather than depleting the beautiful surrounding countryside. Northampton should be the main focus of development, as that is where it would be less encroaching on green space, wildlife, the environment, and the character of existing settlements and its surroundings.
- Whilst villages should be vibrant and well connected the plan should avoid extending urban areas in a way which may seriously impact upon or absorb local villages.
- Northampton already has 55% of the population of West Northamptonshire and has the best transport links to the rest of the country. It also would support the town desire to become a city, by accepting additional population growth to 300,000 people.

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- Development here would be a good option with existing public transport, rail and road links, brownfield sites and empty town centre properties. This is where majority of WN population is (56%) and most of the jobs and where the majority of housing development should be.
- With a vision of Northampton being designated a city, it is unclear what radical changes will be made to enhance, improve, and put it on the map.
- The rural areas around Old Stratford have abandoned Northampton in favour of MK Housing and employment areas should be more equally distributed throughout Northampton [not all the house building to the north and all the industry is to the south].
- Supporting the M1 corridor as the most appropriate location to focus meeting employment needs.
- Development here would be a good option with existing public transport, rail and road links, brownfield sites and empty town centre properties. This is where majority of WN population is (56%) and most of the jobs and where the majority of housing development should be.
- New low-rise developments in the TC: Given the road and rail connections in Northampton, there is a strong case for providing low-rise developments there, rather than expanding even further into the surrounding countryside. Not everyone wants a house with a garden or to be reliant on a car.
- Enough land available on its outskirts that is not too close to villages.
- Northampton should be the focus of all major development. This will ensure people and jobs reduce journeys on the already congested road network.
- There is plenty of warehousing already in this area and there are newly built sites at J16 which further away and much less impacting on residential areas.
- There is no analysis of Northampton's current or potential capacity, and this should be a key element of this plan.
- To meet development needs, opportunities to reuse suitable previously developed land and vacant and under-used buildings within the existing urban area of Northampton should be prioritised.
- Brownfield sites should be considered as a priority- in order to achieve this Council should providing planning incentives to developers.
- There are insufficient sites identified to allow a meaningful choice between the various options. In effect, all will need to come into play providing Hobson's Choice for residents – particularly if our suspicion that the actual housing need exceeds that identified.
- It is important that growth at Northampton and any proposed major urban extensions are deliverable in a realistic timeframe. During the recent Daventry Part II Local Plan Examination, housing under delivery at the NRDA was discussed but due to the two-part nature of the development plan, it could not be addressed through this non-strategic part of the plan. This was a simple failure of the two-part plan process which was unable to react in a timely manner.
- A single development plan document would greatly help the authority to identify a balanced range of site sizes within the plan area. It is noted that if all the proposed Spatial Options 1a-d were included in the emerging plan, this would potentially deliver 11,100 dwellings which may or may not be enough to proportionally address the housing need requirement.

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- Northampton is already the principal urban area, but its boundaries seem to be spreading.
- the Council will need to carefully consider the scale of housing development it directs to Northampton given the level of existing commitments.
- It is already a core economic centre for the area, so development would be building on that fact. But in addition, modern development would have the added benefit of bringing some older, less economically relevant areas up to the modern day, making it a more economically competitive town in the UK.
- In addition to development directed to the urban edge of Northampton, growth should be complimented by the appropriate apportionment of housing growth targets to all settlements across the hierarchy to ensure that complimentary growth is achieved alongside the strategic approach which has historically been taken.
- This spatial option should not be relied upon due to the previous under-supply of housing.
- We say that this Strategic Plan should not direct growth to Northampton whilst proposing growth at Long Buckby and Old Stratford, while there is no housing growth at all directed to Roade. [Chartwell Industries Ltd. land at Roade].
- If you develop westwards, you will be able to meet many of your strategic plan objectives.
- You need accurate information before you can put forward any plan.
- Why not have some communities that are separated from the town say a couple of miles of clear space away from the current boundaries.
- Any development should be concentrated on Northampton as it is the employment centre for West Northants.
- Many residents of Tiffield, Towcester, use Northampton Town Centre as an employment, shopping, and cultural centre.
- Developers for northern areas in Northampton [Option 1a, 1b & 1c] promote and confirm that development parcels can be developed separately or in cooperation with other land promoters and housebuilders.
- The Council needs to carefully consider the scale of development it proposes within and around Northampton, to make sure that development proposals are achievable within expected time frames
- More appropriate to expand Northampton, as it is already an urban area, than Potterspury being subsumed into MK.
- Agree that the preferred Spatial Strategy for West Northamptonshire is likely to comprise of a combination of the Council's potential Spatial Options because of disadvantages associated with pursuing any one potential Spatial Option in isolation. The preferred Spatial Strategy should ensure the availability of a sufficient supply of deliverable and developable land to deliver the housing requirement.
- Large warehousing should be next to motorways and not impact local communities. SME sites need easy access.
- The scale of the proposals up to 2050 hard to justify for any community and its infrastructure.

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- Northampton should see more development and regeneration to help it become the thriving principal town in Northamptonshire and the outer villages should be preserved in their current state.

Town Centre regeneration:

- Northampton needs new life breathed into it, particularly in the town centre and the focus should be on developing the town, not the villages around it.
- To those living in South Northamptonshire, the most prosperous part of WNC, Northampton has become a very unattractive place to go, so the local wealth is being directed towards Milton Keynes. WNC need to recognise this.
- Northampton is looking pretty dilapidated and with previous works down by the council around the future of town centres, it feels like a significant opportunity.
- I would also recommend a good look at investing in dedicated office spaces in the town centre [as commuting might be an option]; Milton Keynes has more suitable office space at the moment [Alex Fenwick].
- Town centre and transport needs investment - people voting with their feet and shop anywhere but Northampton.
- Focus on regeneration of run-down areas.
- Northampton is no longer an attractive town to visit, so many shops closed too many betting shops. Drink & drug problems; feel safe and safety an issue in the town centre.
- Relying solely on a call for sites is not going to meet the urgent need for regeneration.
- Northampton is seeking City status and yet there is little in the plan to reflect that vision and little reference to regeneration of the town centre
- There are many disused buildings in Northampton which could be regenerated as housing and would really improve the town rather than taking the easy option of destroying Northamptonshire countryside.
- Pleased to see the proposal for redundant retail premises in the town centre being turned into residential. Care needs to be taken in town development to prevent it being hollowed out. There is nothing to go for except perhaps the theatre occasionally or hospital if needed.
- Northampton develops into a doughnut - a town with no centre but an ever-expanding outer ring
- There is economical scope in re-generating existing brownfield sites.
- More emphasis needs to be on the re-development of the Town Centre.
- There is a lot of brownfield and older industrial estates that could be re-vitalised and organised - a zonal approach to what goes where.
- More emphasis needs to be on the re-development of the Town Centre.
- There is a lot of brownfield and older industrial estates that could be re-vitalised and organised - a zonal approach to what goes where.
- Brackmills is orderly with good access and well supplied with bus routes and cycle lane.
- Make the town centre car free.
- The town centre of Northampton is not attractive or vibrant. Increased accommodation houses/flats in the centre should improve that.

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- Abington Street is sorely in need of improvement. Why not encourage independent shops and market traders by offering initial low rents.
- Options to opportunities for urban regeneration, multi-use, reuse and repurposing of brownfield sites missing.
- Northampton could really benefit from a whole renewal and regeneration programme. It's a super town, but just needs to be carefully and sympathetically developed in order to return it to what was one a glorious place to live, work and play.
- Northampton town centre could be the jewel in our crown. Its historic centre, its interesting heritage and its central position in the country could make it a go-to destination. Too many unattractive out of town retail parks draw essential shoppers away from the town which has become unsafe, unattractive, and unpleasant to visit.
- Completion of existing committed projects and regeneration of under/dis-used buildings and premises should be the focus first. We would want to see the historic Northampton 'Alive' projects completed first.

Infrastructure:

- The North West Relief road would need to be provided for PRIOR to any expansion and not as a way of offsetting the issues.
- Option 1 [Development in Northampton] is welcomed, as Northampton has a railway station and hospital and more infrastructure than Deanshanger.
- Active travel corridors would be needed to feed into the town centre.
- With public transport links and a population used to urban as opposed to rural areas, development in this area makes sense.
- There is little or no information concerning infrastructure provision around proposed new development areas. It does seem sensible to concentrate development around Northampton although the potential for development around the western boundary of Northampton is constrained by the boundary with North Northamptonshire, therefore narrowing choices
- Developments should not be driven by the need to fund improved connectivity per se (e.g., financing the North Orbital Road) but should be justified in the overall planning context (which ultimately may lead to the provision of improved connectivity but without connectivity being the initiating and driving force).
- The infrastructure is already there to cope with new developments.
- By 2030 there is a real possibility that the current car ownership model will have changed dramatically and simply building more roads is probably not the answer.
- Better public transport links are needed to connect villages to the town.
Northampton is the county town but there is no bus / insufficient bus service to get to it.
- Clearly information needed on infrastructure within and around proposed new development areas: Need to ensure adequate recreation and green spaces area are included with cycle and walking pathways. Local amenity areas need to be included.
- The needs of those growing communities for schools, medical facilities, leisure, and childcare must be taken into consideration during the growth phase, not as a reluctant afterthought when the money has run out.

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- Other Issues:
- There is no mention of support with housing for the homeless in Northampton or of the need for increased social housing.
- Clearly information needed on infrastructure within and around proposed new development areas: Need to ensure adequate recreation and green spaces area are included with cycle and walking pathways. Local amenity areas need to be included.
- Better development, yes. Development in current style - heavy, housing lacking ambition, no.
- With a net zero agenda, the council must also be transparent about the carbon cost of both infrastructure and developments. It must also future proof plans.
- Northampton needs massive investment to grow as a centre.
- Not enough information on Sustainable public transport, especially post-covid and post climate crisis.
- Don't build around Obelisk Rise and Boughton. The area cannot sustain more development.
- Affordable housing provision is required, to help tackle the issue of the affordability crisis.
- Create green routes around and through the town.
- There may be insufficient permitted capacity at Water Recycling Centres to accommodate additional foul flows. The relevant water company will therefore need to make permit or infrastructure alterations to accommodate additional flows via their sewerage infrastructure and water recycling centres. Without this there may be concerns regarding increased risk of flooding, pollution of the water.
- Any new developments will need to follow the Water Framework Directive (WFD) requirements to demonstrate no deterioration of river quality and aim to achieve Good WFD status.
- The cumulative impact of directing further development to Northampton on the integrity of the Upper Nene Valley Gravel Pits Special Protection Area will need to be carefully considered and demonstrated through a Habitat Regulations Assessment.
- Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites.
- The widest possible range of sites by both size and market location are required so that small, medium, and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. (HBF)
- Should developing existing parts of Northampton without encroaching on green space (e.g., old Bus Station area plan). Co-locating employment and housing in urban centres.
- Development in Northampton to ensure WNC's commitment to net zero can be achieved.

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- The new rail freight terminals M1 South (Collingtree/Milton) and DIRFT would serve as better locations as there is already prime space for industry available. It is not fully utilised, so the felling of ancient trees and destruction of farmland and wildlife is pointless in this case in the Daventry Braunston area.
- Development in Northampton to ensure WNC's commitment to net zero can be achieved.
- Large housing developments in Northampton and lower cost of housing compared to the rural villages lend itself to a greater labour pool locally.
- Town housing should be kept in towns and not extended out into the open countryside, in particular enveloping surrounding settlements.
- The Government wants from Northampton to support the Oxford-Cambridge Arc - can the town/county ask the Government for levelling up funds to support the transformation that is needed.
- The new rail freight terminals M1 South (Collingtree/Milton) and DIRFT would serve as better locations as there is already prime space for industry available. It is not fully utilised, so the felling of ancient trees and destruction of farmland and wildlife is pointless in this case in the Daventry Braunston area.
- Development in Northampton to ensure WNC's commitment to net zero can be achieved.
- Large housing developments in Northampton and lower cost of housing compared to the rural villages lend itself to a greater labour pool locally.
- Town housing should be kept in towns and not extended out into the open countryside, in particular enveloping surrounding settlements.
- There's no need for further development, how many are second homes to people living in London. Local people, families, singles can't afford the cheapest of houses.
- The longer-term growth of Northampton was considered during the preparation of the North Northamptonshire Joint Core Strategy (JCS).

Those who objected to the potential for directing further development at Northampton raised the following key points:

Infrastructure & Transport:

- No development- not until the infrastructure is improved. Hospital needs to be moved and a new state of the art one built. Road infrastructure is inadequate.
- All recent connectivity has been through road building. There has been no improvement to rail connections via the Northampton loop.
- Infrastructure first, then a gradual and sensible development, which needs to be much more joined-up.
- The hospital site is not fit for purpose despite recent works to support further population in this area.

Spatial Focus:

- No, we don't agree at all, as Northampton has already seen massive waves of new developments and there is to the best of our knowledge no indication at all that this would have been a particularly successful strategy.

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- The increasing traffic volumes constitute a huge problem (one of many) and we refer back to our previous comments that there needs to be infrastructure first, then development.
- Too much development in Northampton already!
- Building lots of new houses on the periphery of Northampton town will mean more traffic, facilities are out of town and not in the town centre. Carving up good agricultural land where people walk and exercise and spoiling beautiful old villages.
- Adding piece meal to Northampton is not good future planning.
- What about building a New Town? A new village/parish such as Mawsley for 10,000 in a well-located area. One that has a better infrastructure than the ones at Overstone.
- Any more expansion and we will literally be gridlocked
- Northampton suffers from all of the well-documented disadvantages that urban areas create, crime, pollution etc. It should be de-urbanised and large parts demolished and returned to nature.
- Although Northampton needs to attract new hi-tech employers to replace declining industries this does not necessarily mean that the boundaries of Northampton and its surround villages need to be enlarged taking over green spaces as your plan suggests.

Town Centre regeneration:

- Develop existing empty buildings before building on Greenfield, especially in Northampton.
- Need to be positive and proactive about regenerating areas in the existing town and converting existing buildings to housing. With innovative ideas this could create a vibrant community in the town - which is currently a very depressing place.

Parish/Town Council responses:

The following Parish and Town Councils supported the potential for directing further development at Northampton:

- **A5 Alliance of Parish Councils** - Development in Northampton would be a good option with existing public transport, rail and road links, brownfield sites and empty town centre properties. This is where the majority of WN population is (56%) and most of the jobs, and where the majority of housing development should be. There is a need for an Urban Capacity Study specifically for the Northampton & Northampton-related Development Area, and more new development should be placed here in ratio with existing population, rather than in any other area in WNC. Town centre living has been promoted and the A5 Alliance would welcome a vibrant centre to Northampton that would reinforce its stated aim to become a city. This strategic plan fails to provide the vision required for Northampton as it lacks a coherent sustainable public transport objective for Northampton. Question why the development

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site around the Brackmills area was identified in the SHLAA (Site 36) but has been dropped and is not an option for consideration in this consultation.

The draft Plan seems to be for new expansive residential areas that are developer-led through the SLAA and not for a town centre regeneration plan or a plan that examines the sustainability of existing centres. The spatial options do not appear to offer what the town centre of Northampton requires.

- **Blisworth Parish Council** (no comments)
- **Brixworth Parish Council** - More information needed on infrastructure within and around proposed new development areas. Need to ensure adequate recreation and green spaces area are included with cycle and walking pathways. Local amenity areas need to be included. Town centre developments could include retail and leisure outlets on ground level, with dwellings above. The marketplace is very important part of Northampton heritage, but is currently ill-used. Look to find imaginative ways to encourage visitors/tourism.
- **Bugbrooke Parish Council** - it is essential that Northampton is developed as a principal urban area. This vision is starting to be reflected with the University and waterside developments. However, the potential of Northampton town centre is not being met. There needs to be integration of Northampton town centre into West Northants and make sure all the surrounding villages have access to the town with bus services. Northampton town centre needs to move away from being a separate entity and unify the whole of West Northants.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Cosgrove Parish Council** - there are no planning objectives to support the City Bid of Northampton.
- **Culworth Parish Council** (no comments)
- **Daventry Town Council** (no comments)
- **Deanshanger Parish Council** - repeat the comments from The A5 Alliance of Parish Councils (see above).
- **Ecton Parish Council** - object to the identification of Northampton East as a proposed site as it is outside WNC and would be against the recently adopted Ecton Neighbourhood Plan. Disappointed that the other options that WNC are investigating are pretty much all on green field sites. We recognise that windfall sites have been mentioned however we would expect much more regeneration and more ambitious planning in brownfield and town centre sites. Town centre sites clearly are not as profitable as urban sprawl for the developer but would help to regenerate a tired town centre that is struggling to keep any retailers.
- **Evenley Parish Council** - Increase focus of plan on maximising reuse of previously developed and vacant land within existing urban area – this should precede growth on greenfield sites. Focus on high quality design and build to ensure sustainability and longevity of all new developments.
- **Flore Parish Council** - The roads between their location and the town already heavily congested; the major beneficiaries will be workers commuting in from the smaller urban areas within and outside the county, who will have a much easier journey, and the logistics companies who will often be

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headquartered elsewhere and have very little or no commitment to the town. The tendency may then well be to gradually bring the town outwards, thereby compromising the identity of villages, eliminating large areas of productive agricultural land (likely to become in more demand as climate change puts pressure on production elsewhere), and negatively affecting attractive landscapes which provide important relief to urban dwellers. This is particularly true in the case of the proposal at Junction 16 where the proposal would encroach on a special landscape area.

- **Greens Norton Parish Council** - There is a need for an Urban Capacity Study specifically for the Northampton & Northampton-related Development Area, and more new development should be placed here in ratio with existing population, rather than in any other area in WNC. This strategic plan fails to provide the vision required for Northampton as it lacks a coherent sustainable public transport objective for Northampton. This strategy has very little development in the former NBC area and it is inadequate. If we desire Northampton to be a city, it needs to act, look, and feel like one. This plan does not help with this. The opportunity to tie these plans into one coherent vision backed with an action plan has been missed.
- **Harrington Parish Council** - The existing infrastructure and town centre could be improved, provided that any development was fully integrated with the town and not built as a separate, self-contained entity. The design and layout of the houses is also crucial to the question of whether or not the development is suitable.
- **Kislingbury Parish Council** – refers to comments submitted in response to questions 1 and 2.
- **Little Houghton Parish Council** - The potential for using brown-fill sites and under used town centre buildings for both housing and employment should be urgently assessed, together with an exploration of the identified constraints. Sites already identified within the JCS should be progressed before further land is allocated for development.
- **Long Buckby Parish Council** - Keeping economic activity & the associated workforce close together promotes both the business development & green objectives of the plan.
- **Moulton Parish Council** – Assuming this refers to the boundaries of the former borough. Plan needs to reflect government policy and prioritise brownfield development before considering greenfield.
- **Old Parish Council** - Seems logical that the focus of growth is on Northampton, with a view to improving retail and leisure options within the city, which have fallen behind other neighbouring cities.
- **Old Stratford Parish Council** - Brownfield sites should be explored first and foremost for development to avoid using sites on open countryside. Using greenfield sites without the proper infrastructure and planning does not make sense. Highways have got to provide roads to take these people east and west.
- **Potterspury Parish Council** - The urban centre of Northampton needs regeneration, and this would benefit the whole of West Northants. We note that town centre living is being promoted and we would welcome a vibrant

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centre to Northampton that would reinforce its stated aim to become a city. We are concerned that the plans under consideration are for new expansive residential areas that are developer led through the SLAA and not for a town centre regeneration plan or a plan that examines the sustainability of existing centres. The spatial options do not appear to offer what the town centre of Northampton requires to make it a regional centre. This strategic plan crucially fails to provide the vision required for Northampton which is seeking city status. As an example of its inadequacy, there is the lack of a coherent sustainable public transport objective for Northampton. Without a sustainable transport system, the long-term growth of Northampton is at risk.

- **Silverstone Parish Council** - Town housing should be kept in towns and not extended out into the open countryside, in particular enveloping surrounding settlements.
- **Tiffield Parish Council** – Focus on greenfield sites misses the opportunity to support the town centre in accordance with objective 10.
- **Wappenham Parish Council** - Northampton is more sustainable with 56% of WNC population. Support the City Status bid. Needs to look and feel like a city. Increase the density and build up not out. Better road and rail connections. Better public transport needed to support more growth in Northampton.
- **Weedon Parish Council** - It is necessary if Northampton is not to become a completely failed town, but it should be better and higher quality development to raise the economic base. There is no reassurance that the current expansion of Northampton is of any benefit to surrounding communities, for example it has resulted in traffic chaos for peripheral villages and slower journeys for commuters and shoppers. The DDL has done much to improve access from our village to places where there are better opportunities and shops than Northampton. From the Weedon point of view, developments on the edge of Northampton are a disincentive to visit the town as the roads into Northampton have become more congested. Sixfields has become a ‘no go’ area, because of traffic and parking chaos which will inhibit the growth of better retail. People from the villages take their money elsewhere.
- **Whittlebury Parish Council** - Northampton needs to have a proper urban capacity study to ascertain what its capacity is or could be with new infrastructure. The existing West Northants Joint Core Strategy had 66% of the proposed development in the Northampton area, reflecting the population balance. This strategy has very little in the former NBC area and it is inadequate. We desire Northampton to be a city, it needs to act, look, and feel like one. This plan does nothing in that regard. The opportunity to use the plan to help with the regeneration of the town centre and direct, or redirect, growth and change the nature of areas within the plan is sadly lacking.
- In order or meet some of the objectives of sustainable transport, easy access to services and access to public transport, there will need to be a significant increase in these services in Northampton. This plan does not address this issue at all.
- **Wicken Parish Council** - Northampton already has 55% of the population in West Northamptonshire and holds the best transport connections in the

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county. The town's desire to become a city would be enhanced by accepting additional population growth to bring it nearer to 300,000

- **Yardley Gobion Parish Council** - Northampton needs to have a proper urban capacity study to ascertain what its capacity is or could be with new infrastructure.
- The existing West Northants Joint Core Strategy had 66% of the proposed development in the Northampton area, reflecting the population balance. This strategy has very little in the former NBC area and it is inadequate.
- We desire Northampton to be a city, it needs to act, look, and feel like one. This plan does nothing in that regard.
- The opportunity to use the plan to help with the regeneration of the town centre and direct, or redirect, growth and change the nature of areas within the plan is sadly lacking.
- Development here would be a good option with existing public transport, rail and road links, brownfield sites and empty town centre properties. This is where the majority of WN population is (56%) and most of the jobs, and therefore where the majority of housing development should be.

The following Parish and Town Councils objected to the potential for directing further development at Northampton:

- **Church with Chapel Brampton Parish Council** - objects to Option 1 and emphasises the need to improve road infrastructure.
- **Holcot Parish Council** - If there are brownfield sites that avoid using sites in open countryside, then this would make sense. But using greenfield sites aligned to Northampton, with no apparent plans to change transport, employment, social and other aspects, make no sense.
- **Kingsthorpe Parish Council** - Only if investments in appropriate infrastructure are made. Routes into Northampton are already congested, and the town is already over developed.
- **Overstone Parish Council** - Brownfield sites should be explored first and foremost for development to avoid using sites on open countryside. Using greenfield sites without the proper infrastructure and planning does not make sense. Highways have got to provide roads to take these people east and west.
- **Walgrave Parish Council** - Careful consideration should be given to the use of any greenfield sites with the full options of using brownfields sites taken first. What plans are being placed to improve Northampton to ensure that it is a principle urban area that would support a growing community?

The following Parish and Town Councils did not specify 'yes' or 'no':

- **Crick Parish Council** - Northampton is the place that gives you most opportunity to deliver your objectives, but the options that you have identified are missing employment and housing in urban centres.
- **Blakesley Parish Council** - Northampton needs to have a proper urban capacity study. The opportunity to use the plan to help with the regeneration

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of the town centre and direct, or redirect, growth and change the nature of areas within the plan is again sadly lacking. The opportunity to tie these plans into one coherent vision backed with an action plan has been missed.

- **Braunston Parish Council** (no comments)
- **Easton Neston Parish Meeting** (no comments)
- **Hackleton Parish Council** - support the development of Northampton as a sustainable centre for the County. The Strategic Plan must support the regeneration of the Town Centre and ensure that development brings prosperity to the County, not more dormitory estates which feed to Milton Keynes and London. All development must be underpinned by sustainable growth, sufficient quality infrastructure and improved life experiences for all residents.
- **Hinton-in-the-Hedges Parish Meeting** - Difficult to answer as Northampton Town has already burst its current town boundaries and is already eating into rural areas. The poor villages surrounding Northampton are going to be subsumed into being a suburb of Northampton. If someone thinks this is a valid idea, then by all means put everything into Northampton and leave the rest of the countryside alone.
- **Moulton Parish Council** - Assuming this option refers to the boundaries of the former Borough of Northampton, this document needs to reflect the change of government thinking that “brownfield” development is more sustainable and should always be considered a development priority before any consideration of “greenfield” development.
- **Milton Malsor Parish Council** - Existing JCS and Part 2 Plan has kept development within the confines of the M1. As there are now several proposals involving land to the west of the motorway, this elicits concern that Milton Malsor and adjacent villages will be absorbed into Northampton. Northampton needs to increase its housing supply not the neighbouring areas of South Northamptonshire. The proximity of Milton Malsor and neighbouring villages to Northampton raises the prospect of overspill development impinging on these areas due to potential difficulties in fulfilling Northampton’s requirement. With regard to the specific areas proposed for possible development, areas allocated under Part 2 of the Local Plan include four housing areas immediately adjacent to the M1 motorway. For reasons of air and noise pollution, these must be amongst the least suitable locations available.
- **Pitsford Parish Council** - Northampton has grown significantly over the last 20 years to a population of 225,000. By 2050 this and existing plans propose that Northampton expands by almost 40,000 more dwellings. We do not believe that the town has the capacity or infrastructure to support such expansion and that development should be based in areas with the ability to develop such facilities. We agree that Growth round Northampton is constrained by the limited capacity of existing highway networks and the need to protect the landscape fringe and character of adjoining villages. We object to development that impacts on these constraints.
- **Nether Heyford Parish Council** (no comments)
- **Welton Parish Council** (no comments)

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Question 9: Do you agree that spatial option 1a – Northampton North – North of Buckton Fields - has the potential to deliver residential and or local employment development?

- 216 respondents said 'Yes'.
- 202 respondents said 'No'.
- 298 provided specific comments.

Those who supported the spatial option 1a – Northampton North – North of Buckton Fields, raised the following key points:

- The North West Relief road would need to be provided for PRIOR to any expansion and not as a way of offsetting the issues.
- Active travel corridors would be needed to feed into the town centre.
- a school would need to be provided to reduce the existing stresses on local primary/secondary schools.
- Green spaces at Buckton Fields have recently been given up to a large number of houses.
- Further lead to further traffic congestion and danger, noise, and pollution.
- The area to the north of Buckton Fields might be suitable for a much smaller amount of development, accessed from the Brampton Lane.
- Important that the Plan recognises the importance of the Brampton Valley, within which the development will be located.
- Existing new development in this area is already compromising the road network. The North Relief Road is not yet defined, approved, or funded (except with possible additional debt taken on by WNC).
- Major road building schemes clearly have a carbon impact, and it would be helpful for the plan to clarify whether an alternative spatial strategy may avoid or reduce the need for such a scheme?
- Consider where people of that area going to work.
- Electric / light trains would be the way forward [along A508?]
- This development suggests building on an area which is currently a quarry and the piece that is not a quarry is a historic park.
- Buckton Fields is still under construction and when completed there will be over a thousand houses, the development has already had a massive impact on the traffic.
- As long as the flood plain is not built on.
- Local employment seems unlikely.
- This site would help to meet Northampton's housing need and Northampton is the most sustainable location in West Northamptonshire.

Those who objected to spatial option 1a – Northampton North – North of Buckton Fields, raised the following key points:

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- This part of Northamptonshire is included in Natural England's National Character Area 95 (NCA 95): the Northamptonshire Uplands, an area characterised by gently rolling hills, important river valleys, 'small, nucleated villages' and 'wide long-distance views'.
- There would be a significant impact upon Boughton Registered park and garden and its buildings, together with the Scheduled monument of Boughton Bowl Barrow and there is the high potential for other archaeological assets.
- There is also the potential for impact upon Chapel Brampton Conservation Area and potentially Church Brampton. There are views across both conservation areas and park and garden. As such, this site should be discounted at this stage as it most likely to be found unsound by HE.
- The roads serving the area will simply become totally unusable. Until the infrastructure is in place you should not even be considering this as an option.
- Local development will contribute further to congestion of already congested A508.
- Additional congestion at junctions will cause further 'rat-running' in neighbouring villages.
- The local children walking every day to school will experience more pollution, noise, and danger.
- The land to the north is partially a quarry and would need to be filled to accommodate development. There is a significant change of levels from the Boughton Road down into the quarry site. Therefore, the deliverability and potentially the viability of the quantum of development is questionable.
- There has been no cycling infrastructure built in the town recently.
- Bus services will need great improvement.
- If you had a plan to open the Brampton valley way as a bus lane, or light railway then could work.
- Wonder how potential bus routes would run without causing even more traffic problems.
- The proposed site is not suitable for development to the degree included at this time.
- Moore woods sits to the west of the proposed site and remains as a valuable educational asset to Moulton college as well as the local community. The woods and the agricultural land to its east and north east suffers seasonally with water saturation, the whole of the area to the West saw some serious flooding earlier this year.
- Site being considered only if investments in appropriate infrastructure are made.
- The plan will completely change the fabric of the village - it will no longer feel like a village, but more like an extension of Northampton.
- Proposals would have a significant impact on police and fire operations from Mereway and Moulton fire stations and Campbell Square, Wootton Hall, and Weston Favell police stations.
- No more new housing on farmland.
- Areas have multiple landowners, difficult to develop comprehensively.
- The proposal lies immediately west of the nationally significant Boughton Hall Park (Registered Grade II), on the other side of the A508.
- Chapel Brampton is a Conservation Area, and it should not lose its individuality.

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- We shouldn't be expanding the suburbs of Northampton when we could be building higher density within the existing envelope of the town.
- Careful consideration should be given to the development on greenfield sites and the build-up of residential infrastructure.
- The number of new dwellings required being estimated seems rather out of context when one considers net migration figures and the 34,000 dwellings already allocated in Northamptonshire.
- Why, given the amount of brownfield space within the obvious catchment area of the town centre of Northampton, is there a need to extend the already newly densely populated area of the Buckton Fields site.
- Traffic through the areas of Boughton, Chapel and Church Brampton and especially Kingsthorpe has grown to an unsustainable level over the last few years, and it is realistically very unlikely there will be anything done to alleviate this going forward
- Chapel Brampton is a Conservation Area and shouldn't lose its individuality. These are premium villages within the County and add to the County's desirable status as a place to live – the town centre offers nothing to attract new residents. We need to keep what we have remaining i.e., green fields and some premium areas!
- If we want all new development being sustainable. They must be sited in areas with good strong EXISTING transport links, not on the fringes of villages where new homes would necessitate the owners having at least one if not two cars to get about their daily business.
- The current draft plan should be withdrawn and instead you need to look at redeveloping areas close to the town centre with its existing transport links. No major retailers are ever going to consider the sites left behind by the demise of BHS, M&S and Debenhams.
- Provide some good affordable housing on these sites before we start carving up even more of The Rose of The Shires”!
- Buckton Fields has seen an incredibly large increase in traffic, that likely has been added to by the many new local housing estates, what adds to noise, pollution and road safety worries and considerations, especially for children.
- Concern about the heritage and integrity of the historically important villages of Chapel and Church Brampton being lost as local development will swamp and join the villages to Northampton. The villages will completely lose their character,

Other comments made by those who did not specify 'yes' or 'no':

- Employment? Depends on scale and nature of employment. If it generates high quality jobs that support quality homes and minimal commuting that could work. But all 3 elements need to be delivered as one.
- If more houses are needed, it is better to develop the area close to the M1 where there will be more possibilities of employment.
- Connection of Option 1a site with Northampton and Lamport Railway?
- Option 1a/b/c to 1d when put together form an arc around the whole of the top side of Northampton and should be considered as such. As individually they

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may look like they are acceptable together they have a much more fundamental effect on the whole town.

- Existing new development in this area is already compromising the road network. The North Relief Road is not yet defined, approved, or funded (except with possible additional debt taken on by WNC).
- Kingsthorpe has significant traffic issues that will be worsened by this development and the A508 is barely adequate for current needs. Phase one of this development had been earmarked to provide a park and ride facility on site, which has now been taken to build more housing capacity. The council is about to invest heavily in a new multistorey at the station whereas an efficient bus service between a decent park and ride and the railway station may well have been far more cost effective and environmentally effective
- Enhance cycle parking at the rail station should also be considered (c.f. the Netherlands) as NCN6 links this site with the rail station.

Parish/Town Council responses:

The following Parish and Town Councils supported spatial option 1a:

- **Blakesley Parish Council** - Yes it has potential. The North West Relief road would need to be provided for PRIOR to any expansion and not as a way of offsetting the issues.
- **Blisworth Parish Council** - no comments.
- **Brixworth Parish Council** - This site mentions local employment development - the only mixed-use site. What is envisaged here? The northern relief road is not defined/approved which hampers decisions on scale of site. The A508 will be compromised, what plans for upgrade if any? Need local centres.
- **Cogenhoe and Whiston Parish Council** - All development must have the infrastructure in place first.
- **Culworth Parish Council** (no comments)
- **Greens Norton Parish Council** - Option has potential. The North West Relief road would need to be provided for PRIOR to any expansion and not as a way of offsetting the issues.
- **Long Buckby Parish Council** – refers to previous comments
- **Woodford-Cum-Membris Parish Council** (no comments)
- **Weedon Parish Council** - Option has potential. The North West Relief road would need to be provided for PRIOR to any expansion and not as a way of offsetting the issues.
- **Yardley Gobion Parish Council** (no comments)

The following Parish and Town Councils objected to spatial option 1a:

- **Boughton Parish Council** - Many of the 237 sites identified are unlikely to have the same historical significance as Boughton: It is mentioned in the

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Domesday Book in 1086. The village is rich in archaeological remains, including Saxon and Roman sites. From 1351 to 1916, Boughton Fair was reputed to be the biggest in the country. The ruined church of St John the Baptist saw a significant investment of £200,000 by Heritage England in 2018/19 as it continues to be a local point of interest. Medium to high landscape sensitivity: This could result in delay and increased costs to both the planning and construction phases. Focus should be on sites that are less problematic, as there are numerous examples of developers reducing affordable homes or delaying the building of infrastructure because the site has simply become too costly for them. Whilst the consultation refers to protection of some green space, an increase of 1,500 dwellings to the village does not maintain its historical integrity and important landscape. Development at land on site 1a has significant traffic implications on all the surrounding area, including Boughton. If options 1a/b are progressed, then Boughton will provide over 11% of the total options for West Northamptonshire, which is grossly unfair to a historic village which has had typically a population of under 1,000 residents (not dwellings). A New Town option should be considered. This would release development pressure from the neighbouring villages. Alternative locations are suggested near the A45 link road and to the north of WNC near M1 J18.

- **Church and Chapel Brampton Parish Council** - The Parish Council do not believe that Northampton has the capacity or infrastructure to support an expansion by almost 40,000 more dwellings, and that development should be based in areas with the ability to develop such facilities. We agree that Growth round Northampton is constrained by the limited capacity of existing highway networks and the need to protect the landscape fringe and character of adjoining villages. The next stage draft WNSP must include strategic priorities that protects the important rural areas to the north of Northampton, specifically Church and Chapel Brampton. We object to development that impacts on these constraints, specifically:
We object to the possible urban extension ‘North of Buckton Fields’ that identifies an area able to deliver 2,000 dwellings. The recently completed Buckton Fields development has already had a significant impact on traffic movement in the area particularly on the A508 and A5199 resulting in the Bramptons becoming a rat run, and serious delays through Kingsthorpe not only at peak times but throughout the day. We are aware that this area is a valued haven for wildlife, flora, and fauna. The quarry area has been replanted with trees and set aside grassland is a huge benefit for the environment and the people living in the vicinity of these grasslands.
- **Great Oxendon Parish Council** – Object on the grounds of the impact this would have on the busy A508 which would increase the traffic problems already experienced in the village.
- **Maidwell with Draughton Parish Council** - None of these proposed residential options are acceptable, employment options strategically placed on the current road network might be more acceptable.
- **Nether Heyford Parish Council** – Refer to comments regarding subsuming distinct villages into urban conurbations. In addition, any proposed development in these areas would have to include significant infrastructure investment in roads, schools etc.

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- **Overstone Parish Council** - None of these proposed residential options are acceptable. These proposed houses are to be built in areas with poor infrastructure, the worst of which is the inadequate road network. Alternative locations are suggested in Lilbourne, Yelvertoft and Flore Parishes which have better infrastructure and space to accommodate growth. With less highways infrastructure to pay for, money from these projects could be used to pay for an enhanced road network before more homes are built in other areas of West Northants.

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Braunston Parish Council** (no comments)
- **Daventry Town Council** (no comments)
- **Easton Neston Parish Meeting** (no comments)
- **Harrington Parish Council** - there is potential for building on 1a/1b, but the numbers are too high, the density too ambitious. Building with employment opportunities on Option 1A would be welcome. Whilst there is a proposal for a new ring road that would not necessarily alleviate the significant delays into and out of North Northampton on the A508. Both sites would contribute to congestion on what is already a very busy road.
- **Hinton-in-the-Hedges Parish Meeting** -The fairness of further development on the local population is questionable.
- **Welton Parish Council** (no comments)
- **Whittlebury Parish Council** (no comments)
- **Wootton Parish Council** (no comments)

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Question 10: Do you agree that spatial option 1b – Northampton North – East of Boughton - has the potential to deliver residential development?

- 204 respondents said ‘Yes’.
- 221 respondents said ‘No’.
- 259 respondents provided specific comments.

Those who supported the spatial option 1b – Northampton North – East of Boughton raised the following key points:

- The North West Relief road would need to be provided for PRIOR to any expansion and not as a way of offsetting the issues.
- Proximity to the industrial site [Moulton Park] is a strength.
- Preferred to infill development.
- Option 1b, is a logical extension to the outward expansion of Northampton.
- Any use of flood plains needs very careful consideration.
- Road congestion could also be a big issue and needs to be addressed.
- Developing the area should bring social, environmental, and economic benefits associated with the proposal.

Those who objected to spatial option 1b – Northampton North – East of Boughton raised the following key points:

- There is a likely objection in principle by Historic England. There is likely to be significant impact upon Boughton Hall Registered Park and Garden and Conservation Area. Old St John's church is a scheduled monument on the HAR register; Historic England grant aided vegetation clearance and repairs.
- This allocation would potentially result in the merging of the historic villages of Chapel Brampton, Boughton, and Pitsford. There is also the high potential for other archaeological assets. With this proposal the character and setting of the village of Boughton would be destroyed as a separate identity.
- Scale of development in North Northampton as proposed is excessive.
- The land east of Boughton should be considered as two potential strategic sites, north and south of Moulton Lane.
- This is an area of importance for wildlife, fauna, and recreational use by residents. Development would infringe residents' opportunities to access green space.
- New houses require new services and new facilities.
- The existing services (schools, doctors, dentists etc) and infrastructure (roads, technology etc) are already overstretched.
- Development will cause a lot of further congestion by opening on to Holly Lodge Drive. This is extremely congested during rush hour and there will be potential for accidents. There are children crossing Holly Lodge Rise to 2 schools
- Options for development partially dispersed to other settlements should be explored.
- Redevelop the town centre instead.

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Parish/Town Council responses:

The following Parish Councils supported spatial option 1b:

- **Blakesley Parish Council** - Yes – it has potential. The North West Relief road would need to be provided for PRIOR to any expansion and not as a way of offsetting the issues.
- **Blisworth Parish Council** (no comments)
- **Brixworth Parish Council** -The northern relief road is not defined/approved which hampers decisions on scale of site. The A508 will be compromised, what plans for upgrade if any? Need local centres.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Greens Norton Parish Council** – Yes it has potential. The North West Relief road would need to be provided for PRIOR to any expansion and not as a way of offsetting the issues.
- **Long Buckby Parish Council** – refers to previous comments
- **Woodford cum Membris Parish Council** (no comments)
- **Yardley Gobion Parish Council** - Yes it has potential. Access issues will need to be solved PRIOR to any expansion. These must be done initially and not piecemeal with developer contributions.

The following Parish and Town Councils object to spatial option 1b:

- **Boughton Parish Council** - If options 1a/b are progressed, then Boughton will provide over 11% of the total options for West Northamptonshire, which is grossly unfair to a historic village which has had typically a population of under 1,000 residents (not dwellings). Land south of Moulton Lane is proposed to be accessed via Holly Lodge Drive. Whilst the extent of the development represents a further unplanned expansion to the parish, the Council notes the proposed drawing submitted by the developer does maintain a green wedge. Land north of Moulton Lane is entirely unsuitable for housing and should be kept free from development. Land south of Moulton Lane would lead to significant, currently unplanned, expansion of the village but clearly has less impact so long as the green wedge is maintained. Focus should be on sites that are less problematic, as there are numerous examples of developers reducing affordable homes or delaying the building of infrastructure because the site has simply become too costly for them. This development risks coalescence between the rural and urban areas. The plan should protect the important rural areas to the north of Northampton.
- **Church with Chapel Brampton Parish Council:** The proposed 1,500 dwellings East of Boughton would also result in similar traffic issues and object to this development area. Regarding the impact on the character and setting of the village of Chapel Brampton, and to a lesser extend Church Brampton, a further 2000 dwellings North of Buckton Fields will inevitably have a significant impact until highway improvements are completed. The village character and setting will change as the urban extension will bring Northampton even closer resulting in the loss of the village individuality. This development risks coalescence between the rural and urban areas. This is

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especially important as much of Chapel Brampton is a designated Conservation Area which provides protection for the setting and character not just the buildings. The tranquil nature of the area is threatened. The plan must be amended to prevent any further development until the Northern Orbital Road is completed. In addition, access to the M1 via Sandy Lane must be improved. All policy must specifically state that any urban extensions must be contained well within the line of the road. The impact of the road on adjacent villages particularly Chapel Brampton must be carefully considered at the design stage to mitigate the impact of even more noise and pollution.

- **Holcot Parish Council** - Greenfield location, no firm plans for infrastructural development aligned to its impact on existing communities.
- **Kingsthorpe Parish Council** - Only if investments in appropriate infrastructure are made. Routes into Northampton are already congested, and the town is already over-developed.
- **Nether Heyford Parish Council** - New developments subsuming distinct villages into urban conurbations. Any proposed development in these areas would have to include significant infrastructure investment in roads, schools etc.
- **Old Parish Council** - Weaknesses outweigh strengths, especially access issues and habitat loss, with relatively low additional housing capacity.
- **Overstone Parish Council** - The current roads are inadequate for the new builds already planned and existing residents. Lack of highways infrastructure and no funding to build the required infrastructure. Housing needs to be built where highways are already in place, towards the M1, A5, A45 and A14. This will provide funding for infrastructure to the North east of West Northants. This will also give Highways time to provide an adequate route east toward Wellingborough. Currently there is no obvious provision for this, and this must be a priority. The same applies for the West of West Northants and M1. Planners need to take a holistic approach which must include existing and planned residents when looking at development in any area.
- **Walgrave Parish Council** - Housing needs should be considered where highways are already in place, potentially towards the M1, A5, A45 and A14. Planners need to take a holistic approach which must include existing and planned residents when looking at development in any area.
- **Weedon Parish Council** - Concerns as expressed at Q8 and Q9 apply here

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Braunston Parish Council** (no comments)
- **Easton Neston Parish Meeting:** (no comments)
- **Hinton-in-the-Hedges Parish Meeting** - The fairness of further development on the local population is questionable.
- **Welton Parish Council** (no comments)
- **Whittlebury Parish Council** (no comments)
- **Wootton Parish Council** (no comments)

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Question 11: Do you agree that spatial option 1c – Northampton North – West of Moulton - has the potential to deliver residential development.

- 211 respondents said 'Yes'.
- 209 respondents said 'No'.
- 258 respondents provided specific comments.

Those who supported the spatial option 1c – Northampton North – West of Moulton raised the following key points:

- The North West Relief road would need to be provided for PRIOR to any expansion and not as a way of offsetting the issues.
- Sufficient appropriate infrastructure needs to be provided first.
- Proximity to the industrial site [Moulton Park] is a strength.
- Employment should be created nearby.
- In conclusion, the site at Holly Lodge reference ID 29 and as part of Spatial Option 1c is available, achievable, and deliverable.
- Any use of flood plains needs very careful consideration.
- The development of an additional sustainable urban extension west of Moulton would have the potential to deliver further residential and employment development.
- More clarification is needed in regard to the delivery of part of North Northampton Orbital Road.
- Opportunity to link to existing town infrastructure.
- Make sure that the right type of housing is built, as required by young community.

Those who objected to spatial option 1c – Northampton North – West of Moulton made the following key points:

- There is the potential for impact upon Old St John's Church scheduled monument built on the site of an earlier Saxon church) as above and the Grade I church of St Peter and St Paul at Moulton and Moulton Conservation Area.
- This area is poorly served by Highways. The NNOR or an improved version should be built prior to any development. The A43 after Overstone Green is in North Northants so West Northants has no control over its improvement, which also needs addressing prior to any further development in this area.
- This area experiences frequent flooding because of the new houses built.
- Too over-developed and roads not good enough.
- The area is already hugely congested. 40 mins to drive to a 3-mile trip to town as it stands at peak times.
- There is no argument for improving the climate and protecting the environment by building on existing green field sites and agricultural fields.
- Northampton is already too big. New development should go westwards if you are to meet many of your strategic plan objectives.
- Any further development that joins Moulton to Northampton contravenes the objectives of the approved Neighbourhood Plan. Moulton/Overstone have already been joined and engulfed by the SUE.

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- There are known education and health service capacity restraints. The existing services (schools, Drs, Dentists etc) and infrastructure (roads, technology etc) are already in a poor state and without significant investment will mean this area is not fit for further development.
- Moulton could lose its ‘village’ character.
- The local schools are already oversubscribed. There are no schools or community facilities for this type of expansion across the top of the town.
- All northern extensions pose a threat to existing communities, Kingsthorpe, Boughton and Moulton. Moulton is very close to having its distinctiveness obliterated. Overstone is having its distinctiveness removed.
- The plan identifies the green wedge being protected but this does not protect the north and north west edge of the village from physical and visual separation.
- Rat-running at minor local roads.
- Bus and active travel should be prioritised.
- We shouldn't be expanding the suburbs of Northampton when we could be building higher density within the existing envelope of the town.
- Loss of too much open countryside.
- The development of housing on the farmland west of Moulton is neither necessary nor desirable.
- Moulton has experienced a substantial amount of development. This has had a huge impact on the character of the Village of Moulton, which if further development happened it would reflect a huge urban sprawl as opposed to a village.
- Boughton Park is associated with Northamptonshire's largest collection of eighteenth-century follies and other structures and two listed buildings (Holly Lodge and The Spectacle) and is adjacent to the scheduled remains of another (ruins of Church of St John the Baptist).

Parish/Town Council responses:

The following Parish and Town Councils supported spatial option 1c:

- **Blisworth Parish Council** (no comments)
- **Brixworth Parish Council** - The northern relief road is not defined/approved which hampers decisions on scale of site. The A508 will be compromised, what plans for upgrade if any? Need local centres.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Culworth Parish Council** (no comments)
- **Greens Norton Parish Council** - Yes it has potential. The issues raised in the consultation about the effects on the village of Moulton need careful consideration
- **Long Buckby Parish Council** - same comments as under Q8-Q10.
- **Nether Heyford Parish Council:** (no comments)
- **Woodford-Cum-Membris Parish Council** (no comments)

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- **Yardley Gobion Parish Council** - Yes it has potential. The issues raised in the consultation about the effects on the village of Moulton need careful consideration.

The following Parish and Town Councils objected to spatial option 1c:

- **Holcot Parish Council** - Greenfield location, no firm plans for infrastructural development aligned to its impact on existing communities.
- **Kingsthorpe Parish Council** - Only if investments in appropriate infrastructure are made. Routes into Northampton are already congested, and the town is already over developed.
- **Old Parish Council** - same comments as before. Weaknesses outweigh strengths, especially access issues and habitat loss.
- **Overstone Parish Council** - This area is poorly served by Highways. The NNOR or an improved version should be built prior to any development. The A43 after Overstone Green is in North Northampton so West Northants has no control over its improvement, which also needs addressing prior to any further development in this area. A Bypass for Holcot, Overstone and Sywell to take increased traffic from the A43 going east towards Wellingborough is a must as Holcot Lane, Billing Lane and Sywell Road are not built to contend with this traffic.
- **Walgrave Parish Council** - Careful consideration should be given to the build-up of residential infrastructure without due consideration to the impact of village environments and heritage constraints. A Bypass for Holcot, Overstone and Sywell to take increased traffic from the A43 going east towards Wellingborough is a must as Holcot Lane, Billing Lane and Sywell Rd., and local village roads are not built to take this traffic.
- **Weedon Parish Council** - See previous two answers. The Orbital Road on which much of these proposals depend on, feels more like an orbital nightmare due to the impact it is having on surrounding village communities and the rural setting.

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Blakesley Parish Council** - Yes - it has potential. The issues raised in the consultation about the effects on the village of Moulton need careful consideration.
- **Braunston Parish Council** (no comments)
- **Hinton-in-the-Hedges Parish Meeting** - The fairness of further development on the local population is questionable.
- **Kislingbury Parish Council** - as in Q9 and Q10.
- **Moulton Parish Council** - The question should be ‘does such development deliver benefit and enhance the local community?’ to which the reply is absolutely not.
- **Welton Parish Council** (no comments)
- **Whittlebury Parish Council** (no comments)
- **Wootton Parish Council**: (no comments)

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Question 12: Do you agree that spatial option 1d – Northampton North – North of Moulton - has the potential to deliver residential development?

- 211 respondents said 'Yes'.
- 207 respondents said 'No'.
- 251 respondents provided specific comments

Those who supported the spatial option 1d – Northampton North – North of Moulton raised the following key points:

- The North West Relief road would need to be provided for PRIOR to any expansion and not as a way of offsetting the issues.
- Proximity to the industrial site [Moulton Park] is a strength.
- This area could support c 2500 dwellings with additional employment provided nearby could create a sustainable community especially with its closeness to Northampton.
- Not ideal but preferable to option 1c as less impact on village and adjacent to other recent developments east of the A43.
- A43 needs duelling through to Kettering though - if not, then this option (or any other) isn't viable.
- Climate emergency needs to be addressed.
- The sites should get aligned with a clean and green vision of planning and for alternative transport to the private car.
- Such a scheme would be supported as it would also have the additional benefit of providing further services, facilities, and employment opportunities for the existing and future residents of existing settlements such as Moulton and Boughton.
- This side of Moulton has the road improvement already in place to support a large development.
- Broadly agree with development around the outskirts of Northampton subject to the rural and heritage constraints outlined in the plan. However, scale is too big.
- Option will support the delivery of the Northern Orbital.
- The site is exceptionally hard to integrate into the public transport system.
- The site is also reliant on the delivery, in whole, of the Northern Orbital Road, and with it, a very large quantum of associate development. This raises concerns about both appropriateness, and also deliverability.
- The A43 which has recently been upgraded to a dual carriageway, this severs this site from the North of Northampton SUE to the east. This makes integration of the site with the committed SUE far from straightforward. While in broad land use terms it looks as if it acts as some kind of consolidation of what is already an exceptionally lobate form of development, we consider this hypothesised advantage is greatly over-played.
- The development is west of the A43 cannot obviously take advantage of any bus service serving land to the east unless it would come forward as an extension of some kind of local service serving the SUE. While technically possible, the routing of such a service would take it through the SUE and then in all probability Moulton Village, which would make the relevance and attractiveness of the

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service extremely limited. When set against the immediate availability of the A43 at the site entrance which then feeds into the wider primary and national road network, it is hard to see why any resident would use the bus if they had a car available for use.

- Should the site accommodate 1600 dwellings – which may be optimistic – it could operate as a functional neighbourhood with basic local services. However, it is relatively remote from employment within walking and cycling distance. Round Spinney is the nearest and the form of this development “turns its back” to the north so great efforts and care will be needed to address this issue.
- This site would help to meet housing need in West Northamptonshire however residents of Moulton should be able to access the affordable housing as well as Northampton residents despite this being an NRDA site.
- This site should be used by specialist builders, which consider affordability and specialist needs of young families.
- Boughton is a heritage location.
- More needs to be done to support the existing housing before any new housing is built.

Those who supported the spatial option 1d – Northampton North – North of Moulton raised the following key points:

- Connection to employment opportunities on old established industrial estates is questionable.
- The proposed scale of development would be over-development.
- Leave as green space.
- Flood risk.
- Keep village Identity.
- Moulton is already over-developed.
- Additional housing would bring increased traffic and safety issues to the Grove and to the village centre.
- Moulton village is designated as a conservation area and the site of Hog Hole spinney sited off ‘The Grove’, is an area for wildlife habitat and of historic significance having been mentioned in the Doomsday Book.
- Northampton North has high pressure gas pipelines.
- Impacts from new houses: traffic, noise and air pollution, sewerage needs to be dealt with and also more water usage.
- Will cause coalescence between Moulton and Overstone Leys.
- This land is agricultural. It would link Boughton and Moulton village to Northampton.
- the increase in traffic in an already congested Kingsthorpe would be great especially given that the routes to employment to the east and south have to run through pinch points in the town or country lane, which leads to 'rat runs'.
- Moulton has already been expanded beyond all recognition and should not be further expanded.
- Too far from Cambridge and Oxford and no roads or trains to take residents to either place.
- More development would destroy walking routes, green spaces, and fields.

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- There are not enough infrastructure/services in Boughton to support further housing.
- This is a bold intrusion into open countryside.
- Development would not be sustainable in that it is too far from Northampton town centre but is not large enough (1,600 dwellings) to support a local infrastructure (shops, medical centre etc).
- There is already ample over development in the Overstone Leys area. Developing this area between Holcot and Moulton would result in appalling loss of habitat and green space.

Parish/Town Council responses:

The following Parish Councils supported spatial option 1d:

- **Blisworth Parish Council** (no comments)
- **Brixworth Parish Council** - The northern relief road is not defined/approved which hampers decisions on scale of site. The A508 will be compromised, what plans for upgrade if any? Need local centres.
- **Cogenhoe and Whiston Parish** - (no comments)
- **Culworth Parish Council** (no comments)
- **Greens Norton Parish Council** - Yes it has potential. The issues raised in the consultation about the effects on the village of Moulton need careful consideration.
- **Long Buckby Parish Council** - same comments as under Q8-Q11.
- **Nether Heyford Parish Council** (no comments)
- **Old Parish Council** - Not ideal, but of the North of Northampton options, this has the best access and is adjacent to current house building (giving better value for improved infrastructure).
- **Woodford-Cum-Membris Parish Council** (no comments)
- **Yardley Gobion Parish Council** - Yes it has potential. The issues raised in the consultation about the effects on the village of Moulton need careful consideration along with access issues.

The following Parish and Town Councils objected to spatial option 1d:

- **Holcot Parish Council** - Greenfield location, no firm plans for infrastructural development aligned to its impact on existing communities.
- **Kingsthorpe Parish Council** - Only if investments in appropriate infrastructure are made. Routes into Northampton are already congested, and the town is already over developed.
- **Overstone Parish Council** - The A43 Moulton Bypass does not solve issues for existing residents. Planners need to consider how these developments will affect/already affecting existing residents. NCC Highways need to tackle the traffic going from the A43 through to Wellingborough's industrial parks to enable the urbanisation of the North East of West Northants along the border between North Northamptonshire and West Northamptonshire. Current

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developments, also in Wellingborough force both, industrial traffic along Holcot Lane through Sywell, together with motorists through both Overstone and Sywell. A bypass for Overstone and Sywell similar to the A45 link road would be fantastic. Green field sites have already been built on in North East, West Northants. Other sites throughout West Northants should be looked at to save some of the green areas in eastern West Northants.

- **Walgrave Parish Council** - Careful consideration should be given to the build-up of residential infrastructure without due consideration to the impact of village environments and heritage constraints. A Bypass for Holcot, Overstone and Sywell to take increased traffic from the A43 going east towards Wellingborough is a must as Holcot Lane, Billing Lane and Sywell Rd., and local village roads are not built to take this traffic.
- **Weedon Parish Council** - Moulton has already had substantial development. It has important conservation areas; very great care is needed to produce a sympathetic solution. The Orbital road connection to A43 and to Moulton Park needs to be very carefully handled as there is great danger of rat runs through narrow and twisting village streets.

The following Parish and Town Councils did not specify 'yes' or 'no':

- **Blakesley Parish Council** - Yes it has potential. The issues raised in the consultation about the effects on the village of Moulton need careful consideration along with access issues.
- **Braunston Parish Council** - (no comments)
- **Hinton-in-the-Hedges Parish Meeting** - The fairness of further development on the local population is questionable.
- **Kislingbury Parish Council** - as in Q9 and Q10.
- **Moulton Parish Council** – The question should be 'does development deliver benefit and enhance the local community to which the reply is absolutely not.'
- **Welton Parish Council** (no comments)
- **Whittlebury Parish Council** (no comments)
- **Wootton Parish Council** (no comments)

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Question 13: Do you agree that spatial option 1e – Northampton South-East - has the potential to deliver residential development?

- 206 respondents said 'Yes'.
- 221 respondents said 'No'.
- 264 respondents provided specific answers, however 10 of those said that they had no specific comments.

Those who supported the spatial option 1e – Northampton South-East raise the following key points:

- Develop at brown field sites first.
- Good transport links and the space to be able to build new areas without the concern of further traffic problems or overcrowding.
- Could work and support circa 4500 dwellings. Nearby employment area of Grange Park would create a sustainable community with appropriate infrastructure and amenities provided by developer contributions.
- Support only partially, the land above Wootton Road. The road links below Wootton Rd (M1 side) would be pressurised by a large-scale development.
- The sites should get aligned with a clean and green vision of planning and for alternative transport to the private car.
- Very near a lot of existing employment.
- Development of the area would provide opportunity to provide a landscape corridor connecting landscape assets. These landscape corridors provide conduits for local wildlife and safe and attractive routes for pedestrians and cyclists. Significant additional tree planting can be incorporated throughout the site which will also contribute towards biodiversity enhancement.
- The area provides easy links to the motorway and dual carriageways allowing residents to travel into Northampton and to surrounding towns.
- Current data suggests that while there is Dry Water Flow (DWF) capacity at the works to accommodate the flows for some of these options, the capacity is limited, and the works may not have the DWF capacity to accept flows from all of these sites.
- This site would help to meet Northampton's housing need and Northampton is the most sustainable location in West Northamptonshire.
- This site has the potential to add to the pressure on the M1 J15 and the A508 as many of the residents may work in Milton Keynes. That will then impact on the A508 / A5 Roundabout at Old Stratford / Deanshanger which is now at capacity.
- This area is within flood zones 2 and 3 and therefore would require careful management. Subject to a carefully designed interface with the open countryside these areas may be acceptable.
- A larger block of land within this broad option north of Quinton Road and east of the Caroline Chisholm campus would be potentially well located with regard to providing further provision for education.

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- The capacity of the site might be significantly larger than that site that formed part of the application but looks most unlikely to be of a size (perhaps 1500-1600 dwellings) that would justify an entirely new bus route.
- We support the allocation of Spatial Option of 1e but feel that the plan has failed to consider the potential of this site, with a wider allocation providing an improved infrastructure to Northampton instead of pepper potting of development.
- Should options 1e and 1f go ahead, Quinton, Preston Deanery and Courteenhall would no longer be villages
- The villages already suffer from huge amounts of traffic and transport infrastructure has not been identified to cope with increased traffic volumes on existing roads which can barely cope now. Public transport is insufficient.

Those who objected to spatial option 1e – Northampton South-East raised the following key points:

- Weakness outweighs strengths, lack of transport infrastructure in that part of the town area already - A45 is a traffic jam most mornings and evenings.
- Washbrook Lane will not take the amount of increased traffic. It doesn't now with all the lorries coming out of the compound onto the lane.
- Insufficient road network east of Northampton.
- Objections to a scheme to develop 900 homes on three fields on the edge of Quinton.
- The proposed scale of development would be over-development.
- Concern from additional traffic coming up from warehousing going up at J15.
- Concerns over flood risk, and that new development would impact on run off and flood defence options.
- Existing impacts from Amazon warehouse parking and loading docks.
- People living in the proposed new estates, especially the elderly, will have difficulty in accessing shops and medical facilities in Grange Park and Wootton.
- Green Space framework in this area will be impacted on. Impact on the environment needs to be addressed.
- People who work in the existing warehouses and those who will work in the new rail freight interchange do not and probably cannot afford, to live in Grange Park.
- Local surrounding residents should have a say (vote) on this matter.
- This area is essential to flood run off and urban development is likely to be impacted by this and impact flood relief in this area.
- While these sites have more room for expansion and better infrastructure, the development will still impact detrimentally on the rest of the town and county.
- Development of it would lead to the quadrupling of traffic on the narrow B and C roads north and south through Quinton village.
- The area comprises mainly land where existing old woodland exists which supports diverse wildlife.
- The area serves communities in proximity of Quinton and exposed to noise pollution from the M1. The Foxfields area of Grange Park is a valued community asset. The remaining land falls mainly within a flood zone and acts as a flood plain for the area. Any reduction to the natural flood plain serving Wootton Brook

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could have serious implications on the frequency of serious flood events to historic rural communities such as Preston Deanery.

- Negative impacts of development would include: the tiny Wootton Brook would bear the brunt of excess run-off water from 2000 homes built above it, which a 'soakaway' could not possibly mitigate, and the accompanying pressure on the sewerage system in this area.
- Public transport would have to double or triple to support such an increase in population, merely aggravating the traffic congestion on local roads, destroying perfectly serviceable green fields, and obliterating the 'healthy gap' between Grange Park and Quinton.
- No more housing in hope the infrastructure will keep taking it. The St Georges Fields development, and Landimore Park development, has shown that Newport Pagnell Road is at capacity.
- Impact on country park.
- Part of the planned area includes fields close to Quinton and south of Grange Park that were rejected back in 2020.
- Land East of Grange Park and South of Quinton, South of Quinton Road, land East of Grange Park has already been promoted and failed at appeal. This is because it relates poorly to the existing urban form and fabric including sustainable transport infrastructure and services. The existing established woodland blocks reinforce its visual and physical isolation.

Parish/Town Council responses:

The following Parish and Town Councils supported spatial option 1e:

- **Blisworth Parish Council** (no comments)
- **Brixworth Parish Council** - Becoming a crowded area near Grange Park. Potential access not yet clear. Flood risk mitigation should not simply move the risk elsewhere.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Culworth Parish Council** (no comments)
- **Long Buckby Parish Council** See previous responses i.e., same comments as under Q8-Q12.
- **Nether Heyford Parish Council** (no comments)
- **Old Parish Council** - Has some issues, as other sites do, but has the advantage of bigger capacity and fewer weaknesses.
- **Woodford-Cum-Membriis Parish Council** (no comments)

The following Parish and Town Councils object to spatial option 1e:

- **A5 Alliance of Parish Councils** - As an area adjacent to existing large residential developments that currently feed into the A45, this proposed development will create congestion that will extend into Northampton and Milton Keynes. It will add to the already congested A508 that is used by

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commuters going to and from Northampton and Milton Keynes. Additional traffic will place extra burden on the village of Grafton Regis where many historic buildings are affected negatively by the road vibrations. This route that will become even more busy when the Northampton Gateway is fully functioning.

- **Grange Park Parish Council** - Option 1e and also 1f should not be considered for development, but in case they are please consider: The planning inspectorate has already dismissed an application to build 330 houses on this land for serious and substantial planning reasons. The restructure of junction 15 is nearing completion. The new design is supposed to meet a 30% increase in demand on the junction bought about by rail central. We doubt that the extra traffic from the proposed three thousand new dwellings were factored into the capacity calculations. There is a considerable flood risk to mitigate in part of the proposed area. With climate change rightly on everyone's agenda at present it will be unwise to plan over a flood plain particularly around Caroline Chisholm School and down towards to junction of Wooldale and Quinton Roads. The country lanes around Wootton, Quinton and Grange Park will have to be torn up and rebuilt. Primary school, Secondary school and health care infrastructure in the area have already reached their capacity with no proposed infrastructure extension planned. Making the most of previously developed land is a government priority and it will help protect our cherished countryside and green spaces.
- **Greens Norton Parish Council** -The SHLAA has other more comprehensive ideas especially for 15,000 dwellings that are dismissed as undevelopable. These would interact with that scheme and should be given consideration at this point. The Northampton centric, ideas where the developments are pushed out to the former SNC and DDC areas are very evident with these proposals. Some of these sites were lost at appeal; they are close to areas where flooding has occurred in the recent past. Any development would need to ensure that flooding was not exacerbated. These sites would not link easily with the existing settlements at Grange Park and will have issues with access.
- **Hardingstone Parish Council** - Newport Pagnell Rd. Is a minor B Road not designed for large volumes of traffic and is already at full capacity at peak times now, even before those developments are complete. There is no way the road could be modified to mitigate this. Many of the proposed properties in this suggested area would need to use this road to get to the major road network. 3000 further houses would bring about a state of complete gridlock. Each house is likely to have at least two cars bringing a potential 6000 cars. The other two roads-Wootton and Quinton- are equally unsuited to traffic generated by an extra 3000 houses, as are the Queen Eleanor roundabout and the A45.The Joint Core Strategy noted that the A45 Wootton Junction can't take any more. This again is before the 1800 houses are built of already approved development. Access to M1 J15 is likely to be hampered by traffic gridlock from housing and industrial development and the Northampton Gateway, including fleets of HGVs. Will consultations take place with the police and emergency services, education authorities, and GP surgeries to find out if they could provide services and facilities? Northampton General Hospital has been at full capacity, frequently at crisis point, even before the pandemic. A vast influx of new residents without enlarged facilities is a recipe for disaster.

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- **Kingsthorpe Parish Council** - Only if investments in appropriate infrastructure are made. Routes into Northampton are already congested, and the town is already over developed.
- **Potterspury Parish Council** - As an area adjacent to existing large residential developments that currently feeds into the A45, this proposed development will create congestion that will extend into Northampton and Milton Keynes. It will add to the already congested A508 that is used by commuters going to and from Northampton and Milton Keynes. This route that will become even more busy when the Northampton Gateway is fully functioning.
- **Wootton Parish Council** - Wootton Parish is hemmed in not only by both Grange Park and the Hardingstone expansion, but also by the A45 to the north and the M1 to the west. This contributes to considerable congestion and pollution, which will only be made much worse by the opening in 2023 of the Gateway Freight Terminal at J15. This development, a Nationally Important Infrastructure Project and therefore outside of local or regional planning control, will deliver up to 14,000 HGV movements per day. The result of residential development here would be to completely encircle the Parish, reduce or eliminate a hugely important green buffer of diverse rural wildlife and landscape, and present the Parish with overwhelming traffic congestion and pollution for the future. We fail to see how this development would present ‘opportunities to deliver net biodiversity gain and through an appropriate landscape framework present a more sensitive edge to the countryside in this part of Northampton.’ This development would deplete the natural environment. Wootton Parish’ immediate area is seeing so much development that we are collapsing under the vehicle congestion, air and noise pollution and development. It makes no sense at all to build in flood zones. We are already experiencing flooding issues which extend from J15a, through the proposed development area and up to Horton. Additional construction will lead to additional run off and increased flooding.
- **Yardley Gobion Parish Council:** -The SHLAA has other more comprehensive ideas especially for 15,000 dwellings that are dismissed as undevelopable. These would interact with that scheme and should be given consideration at this point. The Northampton centric, ideas where the developments are pushed out to the former SNC and DDC areas are very evident with these proposals. Some of these sites were lost at appeal; they are close to areas where flooding has occurred in the recent past. Any development would need to ensure that flooding was not exacerbated. These sites would not link easily with the existing settlements at Grange Park and will have issues with access. This site has the potential to add to the pressure on the M1 J15 and the A508 as many of the residents may work in Milton Keynes. That will then impact on the A508 / A5 Roundabout at Old Stratford / Deanshanger which is now at capacity. Additional traffic will place extra burden on the village of Grafton Regis where many historic buildings are affected negatively by the road vibrations.

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

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- **Blakesley Parish Council** - The SHLAA has other more comprehensive ideas especially for 15,000 dwellings that are dismissed as undevelopable. These would interact with that scheme and should be given consideration at this point. The Northampton centric, ideas where the developments are pushed out to the former SNC and DDC areas are very evident with these proposals. Some of these sites were lost at appeal; they are close to areas where flooding has occurred in the recent past. Any development would need to ensure that flooding was not exacerbated. These sites would not link easily with the existing settlements at Grange Park and will have issues with access.
- **Braunston Parish Council** (no comments)
- **Hackleton Parish Council** - We do not understand how this option would “present opportunities to deliver net biodiversity gain or present a more sensitive edge to the countryside”. The area is predominantly agricultural land with hedges which provide wildlife habitats and wildlife corridors. Some of the agricultural land in question is even planted with wild bird seed mix where previous flooding incidents have occurred. We refer you to the Hackleton Neighbourhood Plan Appendix Map 8 which shows the sub-regional wildlife corridors which interconnect two SSSI's/SSI's as well as the Upper Nene Valley Special Protection Area. The Wooldale Road and B526 are bottlenecks and the A45 queues badly. The slip road from the A45 to Wootton notoriously queues back onto the A45 at peak times which is hugely dangerous. We also understand that it breaches air quality guidelines. Flooding from the Wootton Brook is also a big concern with the culvert under the A45 not fit for purpose. We refer you to the Hackleton Neighbourhood Plan Appendix Map 7 which shows the current flood risk which extends from junction 15a all of the way through the proposed development area to Horton. A new Emergency Planning Team has been set up by West Northants Council to look at improving community and property resilience to flooding in the Wootton Brook catchment.
- **Hinton-in-the-Hedges Parish Meeting** - The fairness of further development on the local population is questionable.
- **Kislingbury Parish Council** – refer to responses submitted to Q1 and 2.
- **Little Houghton Parish Council** - LHPC has insufficient local knowledge to comment specifically on identified sites. LHPC finds it difficult to agree with further expansion of the towns into rural areas without understanding the impact on heritage assets, conservation areas and existing infrastructure - in particular the highways network. Building on the flood plain MUST be avoided. The potential for using brown-fill sites and under-used town centre buildings for both housing and employment should be urgently assessed, together with identified constraints. Sites already identified within the JCS should be progressed before further land is allocated for development.

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- **Overstone Parish Council** - Possibly. This area is not as well served with transport links as the A45 Link road area or Lilbourne and Yelvertoft. The area is near to Northampton Town and therefore facilities and decent transport links are more readily available.
- **Quinton Parish Council** – Question how this can be an appropriate option in the light of the Manor Oak application which was dismissed by a planning inspector in 2020. We are equally concerned that it proposes to join the Manor Oak Homes plan with one put forward in 2017 by Barratt Homes for 1200 homes wrapped around Caroline Chisholm School - a plan which was shelved by SNC. The number of vehicles on site 1e would double, or even treble, the traffic on the narrow B and C roads north and south through Quinton village. This increase in traffic would put huge strain on the very narrow, windy, and badly kept road from Quinton to the A508 (Wash brook Lane), which was declared by the Planning Inspector not to be 'of the standard suitable to serve the level of development proposed'. Caroline Chisholm School is already oversubscribed, as are nearby primary schools, so 1,500 or more children on site 1e would have to be driven to schools elsewhere, or to newly built schools, thus creating yet more traffic on our roads, as well as more risk for children walking to and from existing local schools. Considerable financial investment in new GP surgeries would be required, because the local GP surgeries do not have space for another 5,000 people from 1e. The tiny Wootton Brook would bear the brunt of excess run-off water from 2,000 homes built above it, which a 'soakaway' could not possibly mitigate. The sewerage system in this area could not accommodate this increase in population. Considerable financial investment in public transport would be required, but that would merely aggravate the local traffic congestion. Destroying perfectly serviceable green fields and obliterating the 'healthy gap' between Grange Park and Quinton would hardly 'present a more sensitive edge to the countryside in this part of Northampton' (Plan p.16). The proposal has been put forward not as the result of a serious consideration of whether this development is actually needed, or is in the right place, or is sustainable in the long run, but because the land is available. Spatial Option 1e threatens the very existence of Quinton as a rural community and is in no way suitable for inclusion in WNC's Strategic Plan.
- **Walgrave Parish Council** – Possibly. The area is near to Northampton town and therefore facilities and transport links are more readily available.
- **Weedon Parish Council** - We can see some sense in these proposals because of connectivity, existing and proposed, to the M1 corridor provided but provided there is sufficient protection given to assets like Courtnall estate. Also, that traffic is directed so that rat runs into local communities are prevented when new development is planned and not after it is experienced to be a problem.

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Question 14: Do you agree that spatial option 1f - South of M1 Junction 15 - has the potential to deliver employment development?

- 256 respondents said “yes”
- 185 respondents said “no”
- 291 respondents provided specific comments

Those who supported spatial option 1f – South of M1 Junction 15 raised the following key points:

- The option would provide a sensible extension that utilises existing connecting infrastructure effectively.
- The location of spatial option 1f is located close to the existing road network, especially the M1.
- The location of spatial option 1f has good logistic connections as well as good routes into Northampton
- Development of good quality employment opportunities next to the M1 has some merit as the location next to the motorway would not suit housing.
- Considering neighbouring development, this proposal is acceptable.
- Provision of employment sites would provide the people of Northampton with jobs.
- It is understood that employment use is already on part of this site and it would be sensible and practical to continue to develop what is brownfield land.
- One respondent considered that this location would be ideal for enhancing Northampton’s existing reputation as a prime logistics centre, with a view to supporting sustainable logistics via a new rail freight interchange. However, there must be adequate landscaping and flood alleviation provisions.
- In principle support development at this location but would like to see further details on the land take and type of employment.
- There is lots of potential for businesses in this area as it is a central location within the country.
- No objection to strategic employment growth strategy of allocating sustainable sites on the edge of settlements. However, consideration of the wider Oxford to Cambridge Arc is needed and the context within it, and with neighbouring authorities.
- Whilst strategic employment sites are needed, a greater acknowledgement of the contribution that smaller employment sites make to the economy is needed.
- Issues such as any impact on Courtmell could be overcome through the use of tree screening and bunding.
- The site could be used for some B Class employment which complements the strategic rail freight interchange, but any proposals would need to be engineered to align with HGV procedures for Northampton Gateway to ensure HGV traffic cannot travel south on the A508.
- The infrastructure changes have already started in this location.
- Other development (employment and residential) is located nearby which is a benefit.

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- The land here has the potential to deliver employment opportunities but also important to allow new commercial developments in rural areas.
- Support development here on the proviso it does not cause further congestion at the Old Stratford roundabout.
- If the development is implemented, then public transport would need to be improved to avoid single car trips.
- If an employment allocation is made at this site then there will need to be improvements to infrastructure, especially transport infrastructure.

Those who objected to spatial option 1f – South of M1 Junction 15 raised the following key points:

- Further development here would increase air pollution and decrease quality of life for existing and new residents. If seeking to minimise carbon, then developing open fields should be the last resort. An increase in air pollution would also conflict with the Green and Clean objective.
- Developing this site would remove green areas and farmland which is currently preventing coalescence with the village of Courteenhall.
- Development here would have an adverse impact on the landscape and character of the area.
- Whilst part of the site is currently being used it should be seen as greenfield land and not brownfield.
- Brownfield land should be developed before greenfield.
- Developing this site would remove amenity from residents who use the fields for walking / leisure.
- Respondents raised the issue that more jobs will be automated in the future and will employ less people, especially in the logistics and warehousing sectors.
- The jobs that are provided in warehousing / logistics would be low skilled and would be at odds with trying to raise attainment and improve life chances of the residents of West Northamptonshire.
- One of the most raised issues was around traffic and congestion. Respondents noted that surrounding roads are already at capacity (especially the A508 and the M1 junction) and that development here would increase traffic as employees would rely on the use of a car to commute.
- Along with increasing poor air quality, it was considered that the amenity of residents will be further decreased through noise pollution.
- It was noted that there was an oversupply over industrial employment in the area with the employees expected to have to travel from Northampton to get to work.
- Concern was raised over potential development on a flood plain and that any mitigation on the site should not increase risk elsewhere. However, it is noted that the Environment Agency state that ‘There are ordinary watercourses located on the site which have not been modelled, however this should not prevent the site from being developed’.
- Concerns on the impact of potential development on the heritage of Courteenhall (Grade II* and Registered Park and Garden) and the character of Courteenhall village.

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- A new, self-contained village or town with residential and employment development would be a better option.
- Employment should be in larger settlements such as in Northampton which could be regenerated for such purposes.
- Development here would impact on biodiversity.
- The proposals would have a significant impact on police and fire operations from Mereway and Moulton fire stations and Campbell Square, Wootton Hall, and Weston Favell police stations. Information is currently being sought on the capacity within these facilities.

Parish / Town Council responses:

The following Parish / Town Councils supported spatial option 1f:

- **A5 Alliance of Parish Councils** (no comment)
- **Blakesley Parish Council** – area is in effect brownfield and is pragmatic to allocate this land and allow some B Class Use.
- **Blisworth Parish Council** (no comment)
- **Brixworth Parish Council** – flood risk should not be moved elsewhere and note that the junction to and from the M1 is crowded.
- **Cogenhoe and Whiston Parish Council** (no comment)
- **Cosgrove Parish Council** – in effect it is brownfield land with good transport links
- **Culworth Parish Council** (no comment)
- **Greens Norton Parish Council** – in effect brownfield land so pragmatic to allocate this.
- **Kingsthorpe Parish Council** – has good routes into Northampton
- **Long Buckby** (no comment)
- **Nether Heyford Parish Council** (no comment)
- **Old Parish Council** – meets most requirements and not too many weaknesses
- **Old Stratford Parish Council** – In effect brownfield land with good transport links
- **Silverstone Parish Council** – if distribution developments are necessary then it is important that they adjoin the motorway junctions. However, access must be limited to A508 and A5.
- **Whittlebury Parish Council** – The area is in effect brownfield land and it is therefore pragmatic to allocate it. HGVs should not be able to travel south on the A508
- **Wootton Parish Council** – in principle agree but would need to see details of the proposed units to be built.
- **Yardley Gobion Parish Council** - The area is in effect brownfield land and it is therefore pragmatic to allocate it. HGVs should not be able to travel south on the A508.

The following Parish / Town Councils objected to spatial option 1f:

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- **Easton Neston Parish Meeting** – the strategy lays out an oversupply of industrial land and the road network is at capacity.
- **Grange Park Parish Council** – Raise concerns about the capacity of junction 15 of the M1 and of other infrastructure such as schools and health care. Concern also on the flood risk of bringing the site forward.
- **Hackleton Parish Council** – Development along the M1 is predominantly warehousing which brings low skilled and paid jobs. Should be looking to attract high skill jobs to the area. If continuing with warehousing, then low-cost housing will be a priority.
- **Hardingstone Parish Council** – The junction is already busy with queues at peak time.
- **Little Houghton Parish Council** – finds it difficult to agree with further expansion of towns into rural areas without understanding the impact on heritage assets, conservation areas and existing infrastructure, in particular the highways network.
- **Overstone Parish Council** – the area is not as well served with transport links as the A45 link road area of Lilbourne and Yelvertoft. However, it is near to Northampton where facilities and decent transport links are more readily available.
- **Tiffield Parish Council** – The strategy lays out an oversupply of employment land. Development at J15 would compromise the ability of the road network to accommodate the increase in traffic movements.
- **Walgrave Parish Council** – full consideration should be given to heritage

Moulton Parish Council – did not specify ‘yes’ or ‘no’ but noted that the map showed no residential development within reach of the employment areas.

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Question 15: Do you agree that spatial option 1g - South M1 Junction 15a - has the potential to deliver employment development?

- 224 respondents said “yes”
- 215 respondents said “no”
- 271 respondents provided specific comments

Those who supported spatial option 1g – South M1 Junction 15a raised the following key points:

- The site is accessible: it is right next to the M1 and A43 (and onto the M40)
- The site is also well connected in terms of the rail terminals, and north/south and east/west motorway and trunk routes.
- If development does go ahead in this location, a green wedge should be implemented between the new development and existing villages.
- Views of the landscape should be protected if development happens here.
- Infrastructure is already developed in this area and should be utilised.
- In some cases where respondents were supportive of this proposed allocation, they also stated that infrastructure would need to be improved. This was especially in the case of transport infrastructure: improvement to junctions and increasing capacity of M1.
- This proposed allocation would benefit from proximity to the existing Swan Valley employment area.
- Housing development nearby make this site ideal for employment.
- Some residential provision should also be made for those working in this proposed employment area
- The amenity of nearby residents should be protected if this site is developed
- If developed, the Grand Union Canal should not be disturbed or ruined
- The Grand Union Canal would run through the site. It is a designated conservation area with Grade II Listed locks and, as such, a detailed heritage assessment would be required.
- There is an opportunity to establish a sustainable approach to employment that looks at the wider area of West Northamptonshire.
- Consideration should also be given to neighbouring authorities and the wider Oxford to Cambridge Arc.
- Large employment development is supported but there needs to be a greater acknowledgement of the contribution that which is made to the economy from smaller employment sites.
- Development here would help Northampton’s ambition to become a city.
- Any sites coming forward here should be assessed in accordance with land contamination.
- If developed, appropriate design and landscaping should take place to maintain villages
- The proposals would have a significant impact on police and fire operations from Mereway and Moulton fire stations and Campbell Square, Wootton Hall, and Weston Favell police stations. Information is currently being sought on the capacity of these facilities.

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- Concern over commuting to work – consideration needed of how this would be mitigated – i.e., not increase motor journeys and increase public transport
- Development supported – the site could supply 200,000sq.m of employment floorspace; approx. 2,500 – 3,000 jobs
- The proposals have the potential to improve cycle / walkways

Those who objected to spatial option 1g – South M1 Junction 15a raised the following key points:

- The proposed site is too big
- Employment development should be kept to the north of Junction 15A of the M1.
- The site would impact on adjoining villages in terms of the quality of life of the residents
- Towcester should not be extended further
- If developed, this proposal would join up Northampton and Towcester
- M1 traffic is at a standstill during the rush hour and development here would further exacerbate that problem.
- Many respondents commented that providing employment here would significantly increase traffic on the road network overall due to over reliance on the car for commuting and from HGV movements.
- Concerns on the heritage of nearby villages including conservation areas (Rothersthorpe and Milton Malsor).
- Concerns over the impact of proposed development on the Grand Union Canal (and its heritage)
- Development of this site would cause light pollution
- Development of this site would cause noise pollution
- Development of this site would cause air pollution
- Part of the site is within a flood plain area and development could cause flooding
- The Grand Union Canal is a wetland area that regularly gets water-logged.
- Concerns that development of this site would worsen flooding nearby
- Development of such a big employment site would swallow up existing businesses.
- The development would have negative impacts on tourism and visitors would not want to come to the area.
- Development would cause the loss of public rights of way
- Any development here would impact the rural character of the area and nearby villages would lose their identities.
- Concerns over the impact of the proposed allocation on Rothersthorpe's heritage (above and archaeological, below ground heritage).
- Development of this site would mean that the green buffer between Northampton and surrounding villages would be reduced.
- Development of proposed employment allocation and loss of open fields / countryside
- Development would result in the loss of important habitats and be detrimental to biodiversity.
- There is an over dependence on logistics employment

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- There is too much development in this area
- There is an over-supply of industrial land
- Warehousing is expected to become automated and would not bring the expected jobs
- The site is remote from residential development and would promote commuting.
- Warehousing provides low skilled and low paid jobs only; and mainly male-dominated
- If concentrating on low skilled and low paid jobs, will need low-cost housing as a priority
- Development here would involve the loss of arable land
- Junction 15A of the M1 would need to altered and improved, which might mean the service stations would need to be moved, rendering the site unviable.
- Any development on this site should be proportionate to the village of Rothersthorpe – potentially the site could be used for housing or a retail village hub.
- Warehouses that have just been constructed have not been let yet therefore building more might not be necessary
- Development of brownfield land should be a priority
- Concern about where the employees going to come from
- Concern about coalescence with nearby villages
- This land should be designated as Green Belt
- Concern for the mental health of villagers who chose to live surrounded by greenspace
- Concerns raised over whether the site can be effectively served by public transport and on the transport modelling behind the plan.

Parish / Town Council responses:

The following Parish / Town Councils supported spatial option 1f:

- **Blisworth Parish Council** (No comment)
- **Brixworth Parish Council** – Support the proposed allocation but ask whether it could be scaled back so as to not impact on the conservation areas of Rothersthorpe and Milton Malsor.
- **Daventry Town Council** – The site's proximity to a major road network suggests the area has potential to be an asset, as long as the design blends in with the nearby conservation area.
- **Kingsthorpe Parish Council** (No comment)
- **Long Buckby Parish Council** (No comment)
- **Nether Heyford Parish Council** (No comment)
- **Woodford-cum-Membris Parish Council** (No comment)

The following Parish / Town Councils objected to spatial option 1f:

- **Blakesley Parish Council** – To develop this site, there would need to be significant improvements to junction 15A of the M1. This might require the

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relocation of the service stations which would make the site commercially unviable.

- **Bugbrooke Parish Council** – Considers the area to already be very industrial looking
- **Culworth Parish Council (No comment)**
- **Easton Neston Parish Meeting** – The strategy lays out an oversupply of industrial land. The road network is at capacity and would not be able to accommodate the additional traffic. The development will subsume the village of Milton Malsor.
- **Flore Parish Council** – ‘Big sheds’ would have a detrimental impact on Rothersthorpe village and the canal.
- **Greens Norton Parish Council** – To develop this site, there would need to be significant improvements to junction 15A of the M1. This might require the relocation of the service stations which would make the site commercially unviable.
- **Moulton Parish Council** – The map shows no residential within reach of the employment areas.
- **Old Parish Council** – Concerns over heritage and flooding
- **Silverstone Parish Council** – The site borders too closely to Rothersthorpe and Milton Malsor. Being on the A43 would place an even greater strain on it.
- **Syresham Parish Council** – large warehousing will have a detrimental impact on the local environment and landscape. The A43, M1, B4525 and A422 will be further impacted by HGV traffic.
- **Tiffield Parish Council** – The strategy lays out an oversupply of employment land. Development at J15A would swamp Milton Malsor and compromise the ability of the road network to accommodate the increase in traffic movements.
- **Weedon Parish Council** – Development here would impact the village, its heritage assets, and the canal corridor.
- **Whittlebury Parish Council** – To develop this site, there would need to be significant improvements to junction 15A of the M1. This might require the relocation of the service stations which would make the site commercially unviable.
- **Yardley Gobion Parish Council** – To develop this site, there would need to be significant improvements to junction 15A of the M1. This might require the relocation of the service stations which would make the site commercially unviable.

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Braunston Parish Council (No comment)**
- **Hackleton Parish Council** – Current development along the M1 is warehousing which brings low skilled and low paid jobs. We should be looking to attract high skilled jobs to the area. If warehousing developments are continued, then low-cost housing is a priority. To grow and regenerate Northampton, vacant and underused buildings should be developed for business using high quality urban design. Development of brownfield sites should be a priority.
- **Hinton in the Hedges Parish Meeting** – Everything has ‘potential’ but has concerns as to whether council taxpayers want it.

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- **Kislingbury Parish Council** – The response declines to vote for particular options.
- **Little Houghton Parish Council** – Finds it difficult to agree with further expansion of towns into rural areas without understanding the impact on heritage assets, conservation areas and existing infrastructure, in particular the highways network.
- **Milton Malsor Parish Council** – Concerns over possible access from Towcester Road, the site consuming large amounts of agricultural land and impinging on the rural setting and approaches of Milton Malsor.
- **Rothersthorpe Parish Council** – The council provided a comprehensive response which raised the following issues:
 - Loss of productive arable land
 - Undermining of local tenant farm businesses and employment
 - Negative landscape impact
 - Loss of open field wildlife habitats and ecology impacts [impact on biodiversity]
 - Negative impacts to ancient Osier Reed Beds located on the eastern fringe of the proposed site
 - Negative impact on the Grand Union Canal Conservation Area (Buffer)
 - Negative impact on local tourist businesses and employment
 - Noise pollution associated to a 24-7 operational supply chain / industrial development
 - Light pollution
 - Pollution (vehicles, building operations, waste, Carbon footprint of physical warehouse construction)
 - Cumulative impact that effects development within existing parish boundaries
 - Traffic impact on Highway's network, motorways, and local villages
 - Loss of existing public rights of way
 - Increased flooding risk onto North Street Rothersthorpe
 - Proximity to significant historical earthworks, land features and recorded sensitive archaeology assets
 - Impact to the rural character and history of the village
 - Loss of identity as the village is consumed into the town with no greenspace to preserve village boundaries
- **Wootton Parish Council** – Additional information required

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Question 16: Do you agree that spatial option 1h – Land at M1 Junction 16 has the potential to deliver employment?

- 259 respondents said 'Yes'
- 152 respondents said 'No'
- 236 respondents provided specific comments

Those who supported that spatial option 1h – Land at M1 Junction 16 raised the following key points:

- Easy transport links – proximity to M1
- There are no options that have zero detrimental effect. This site has the potential for both residential and employment options. Nearly all of the other proposed residential options will overburden already stretched resources and this site has the option to create a new hub with potential for further development. The site offers the best option for both employment and residential development because:
 1. It has the least detrimental effect on existing rural communities
 2. Access would need minimal new provision
 3. It has close proximity to employment opportunities minimising travel requirements for residents
 4. It has potential for future expansion
- Local houses should be considered to create sustainable communities
- If the area was reduced in size and followed closely the M1 corridor, as well as not intruding too far off the A4500 the impact would be reduced
- Good area as compliments existing developments on A45 around M1 J 16.
- Better to locate industry here as there are better transport links to the north/south and to the east and west via the A45/A43 Further away from residential areas
- Infrastructure is already developed in these areas.
- Better to locate industry here as there are better transport links to the north/south and to the east and west via the A45/A43 Further away from residential areas
- Most favourable of the three motorway areas highlighted due to less flooding impact.
- It will support workers in that area and so benefit that local economy directly.
- Significant access to major roads and infrastructure to support
- Warehouse expansion in this area continues to establish the important role that Northampton will fulfil in this area and the growing importance of Northamptonshire itself.
- A sensible extension that utilises existing connective infrastructure effectively.
- Prefer to see a new hospital built there. Is that land not subject to a planning request for a solar farm?
- Future development must have access to electric railways.
- This option is shown on the flood map as within flood zone 1. There are ordinary watercourses located on the site which have not been modelled, however this should not prevent the site from being developed. The site options 1a – 1h are all adjacent to the Great Billing Water Recycling Centre catchment which we assume would treat the foul flows they would generate.

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Current data suggests that while there is Dry Water Flow (DWF) capacity at the works to accommodate the flows from some of these options, the capacity is limited, and the works may not have the DWF capacity to accept flows from all of these sites.

- For business and for housing as well, more or less the size of Towcester.
- This would be a preferred option - as this would not have a negative impact on the environment or residential potentials.
- Loads of potential for businesses in this area, central to country, seems like a reasonable proposition and would encourage more employment opportunities
- At a reduced scale possibly. The infrastructure and industry look to be in place already to some degree, access to M1 a positive. If the underlying need for housing in Northants is to service areas outside of the county this option would rate highly due to the location and M1 access. Seemingly minimal impact to North and East. Public rights of way can be diverted or the development sympathetic to their position. Flooding needs to be addressed as a priority climate change tells us this will only get worse.
- Despite effect on some local landscape, warehousing should always be delivered adjacent to motorways.
- J16 has great potential for further commercial and residential development and help towards building the target housing required by the government. Also, to offer great opportunities for the village of Harpole and possibly bring the needed affordable housing of its residents' children without losing its character. J16 also has great commute opportunities for both London or Birmingham and is the perfect location for development.
- These proposals would have a significant impact on police and fire operations from Mereway and Moulton fire stations and Campbell Square, Wootton Hall, and Weston Favell police stations. Information is currently being sought on the capacity within these facilities.
- All this employment development centres around transport & logistics and increasing traffic on the M1 and surrounding roads. This is not only male-dominated/low skill/low paid employment, but at odds with the Green & Clean objective. How does adding thousands more lorries to our roads and building these massive warehouses on greenfield sites align with this objective? Northamptonshire is not the country's warehouse.
- The centralised logistics/'deliver one item at a time' model is absolutely at odds with the need to develop a more sustainable, more green economy and alternatives to this must be explored first.
- If WNC genuinely have Climate Change as Objective 1, they need to reassess their dated economic growth plans and develop new job opportunities in town centres.
- We consider that this location takes good advantage of direct public transport links that are amenable to effective further improvement. We broadly support identification of this location for employment. It relates directly to the existing strategic bus corridor between Northampton and Daventry, and as a result both benefits from the service and credibly supports measures that would tend to strengthen. A bus only link between the western end of the site and the accommodation bridge over the M1 at Upper Heyford could greatly assist bus penetration and service delivery not only at shift change times, but also throughout the day. A bus spine through the site parallel to and north of the

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M1 would maintain the maximum flexibility for parcelling up the land in response to market/occupier requirements, and we urge the promoter and the Council to look at this very carefully.

- The site promoters have provided a detailed response in support of the potential spatial options. This argues that the merits of the site need to be considered in the current planning context which is different from that considered by the Joint Core Strategy Inspector who rejected this site. The changed circumstances include up to date national policy which identifies the logistics sector as being crucial and having specific locational requirements, the prevailing economic circumstances which identify substantial demand for logistics sites, and an up-to-date consideration for the Special Landscape Area which need not prejudice consideration of further employment allocations at J16.
- Support as long as there are employees in the local area to fill the vacancies.

Those respondents who objected to spatial option 1h – Land at M1 Junction 16 raised the following key points:

- There is potential, but not wholly appropriate across the whole site, due to the impact on nearby Harpole. A more linear development along the northern side of the M1 would be preferable, with suitable screening options hiding the development from Harpole and provide a suitable corridor for any diverted public rights of way to run through - including surfaced active travel routes.
- Landowner unwilling for this land to be developed and the land will not be made available for development.
- Over dependence on logistics. Warehousing is and will become almost entirely automated meaning large areas developed with few employees required. Environmental considerations would imply a development of a low-rise buildings for manufacturing purposes would be more suitable.
- This is all just going to make the traffic and environment unsustainable.
- Protect our countryside. Use what exists first
- WNC's Planning Inspector who said that this option is within a special landscape area as identified in the South Northamptonshire Local Plan (Part 2) and employment development, which would inevitably involve large buildings and would have a significantly detrimental impact on the local landscape north of the A4500.
- It will deliver employment but is too rural. Increased environmental impact due to transport to site.
- The disadvantages far outweigh the advantages
- Although you claim to want businesses based on low carbon and new technologies, you are basically providing locations for development sites for distribution and fulfilment centres. All of the M1 sites are very good for the logistics industry and keep vehicle movements out of Northampton. All good, but this is an industry with enormous potential for automation and this will happen as access to cheap labour continues to dry up. Where are the sites local to where people live?
- Traffic increase. Too far from town. We must use brown field sites first.
- Warehouse development in this area has already ruined the Nene Valley landscape.

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- The WNSP recognises the following weakness of the site. Given that employment development in this broad location has already been assessed as harmful in a local plan examination context, and that reasonable alternatives for the proposed development exist elsewhere, it would be inappropriate to consider Spatial Option 1h for development potential. There are also reasonably available sites appropriate for employment development in areas with potentially less landscape and overall sustainability harm, that being at land north of Bedford Road, Northampton.
- Recent developments such as Panattoni Park have had a detrimental impact on the landscape character of this area. It does not need more.
- Developer-driven development has no place in strategic planning. Where is the genuine and publicly supported evidence of need?
- There would not be any material benefit to the local area from further development. The appearance of the existing development and the additional heavy goods traffic it generates have already had a very detrimental effect. The area is already very industrial looking. The existing development has already had a detrimental impact on the local landscape, noise levels and wildlife. The existing development should be screened by trees to reduce the impact on surrounding once rural villages that are losing the rural views to industrial units.
- No because of its proximity to the village of Harpole. However, the land surrounding Harpole could be considered for smaller scale residential development, building on the special characters identified there.
- Focus should be on regenerating existing built-up areas, not building on 'green space' in the interest of profits for developers. Building on such areas will affect biodiversity, pollution, traffic, and existing infrastructure.
- The spatial options 1f, 1g & 1h presents a very significant change to the precise nature of our quiet, rural village and surrounding area. It will damage wildlife habitats and eco systems, it will present increased incidence of flooding, will have a negative visual impact on our village, is over-bearing in its nature and creates an imposing and out of character impact on our existing conservation area.
- The main attraction of the area is attributed to warehouse and distribution due to proximity to the M1 and London main rail line. Modern day warehouse modal hubs are and will be more automated than ever before - employment opportunity will be very low due to automation.
- The option has no rail connections.
- Junction is already at capacity.
- Almost daily incidents with this stretch of the M1 means that the M1 would not be able to cope with the increased amount of cars and traffic from residents in this area. Increased traffic, air, noise pollution and decreased quality of life.
- CPRE would be opposed to the development of this land which is designated as a special landscape area as identified in the South Northamptonshire Local Plan and was upheld by the Inspector who examined the plan. Development in this area would also have a detrimental impact on the setting of Harpole as a rural community and also upon the conservation area.
- It is in the Nene Drinking Water Protected Area.

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Other comments made by respondents who did not specify ‘yes’ or ‘no’:

- M1 is already at a standstill during rush hours - why add more burden?
- Is there sufficient public transport to that area?
- There is no point having COP 26 etc if all the planning ignores the impact of all this development in rural areas – the carbon footprint in the immediate area must be immense and the solar and wind farm will do little to alleviate this problem.
- This option is very remote from residential areas so would promote a very significant increase in commuting. It is not well served by walking, cycling or public transport alternatives to commuting. Area within a Special Landscape Area! Thus, opposite to stated policy in Objective 3: To protect and enhance West Northamptonshire’s distinctive landscape character especially those valued landscapes which have been designated as special landscape areas.
- You need accurate information before you can put forward any plan.
- M1 safety issues due to smart motorways.
- Given the structural changes which have occurred there is now an opportunity to establish a truly sustainable approach which considers the plan area as a whole rather than the former sum of its parts (Northampton, Daventry, and South Northamptonshire). To this end, it is considered that greater consideration should be afforded to neighbouring authority areas, which will influence the spatial pattern of economic development. For example, the needs arising from the Arc in the south and high levels of growth in the north, for example Rugby Borough.
- There also needs to be a greater acknowledgment of the contribution which is made to the economy from smaller employment sites.
- The authorities Conservation and Archaeological advisors should be consulted. There is archaeological potential at the site. There is evidence of ridge and furrow. Further assessment will be required, with specific reference to impacts upon the Grade II* church at Harpole.
- Building more warehouses is not necessarily delivering employment development.
- The focus of this development seems to be within the logistics area. Another group of warehouses would provide employment, but it is not highly skilled nor does it provide much in the way of career development for local people. In what way will the council promote and encourage businesses requiring highly skilled workers into the area? How will the effects of a commute to work be mitigated in terms of traffic congestion and pollution?

Parish / Town Council Responses

The following Parish and Town Councils supported spatial option 1h:

- **Blisworth PC** (no comments)
- **Cogenhoe and Whiston PC** – (no comments)
- **Culworth PC** – No comment provided
- **Daventry Town Council** - Unable to give a knowledge-based answer to this question or argue the rationale. However, the strengths outweigh the weaknesses and road infrastructure can be easily adapted to accommodate increased traffic flows. Considered planning (in relation to heritage and

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landscape) and choice of industry would need to be undertaken to mitigate the detrimental impact on the landscape.

- **Greens Norton PC** - Yes -It has potential, but this site was specifically removed by the inspector at the last South Northants Local Plan Part 2 - what has changed to include it now?
- **Kingsthorpe PC** - Proximity to motorway and land for warehousing.
- **Long Buckby PC** - LBK evidence of some serious investigation of the proposed sites. Not just a few bald facts available from the internet. A thriving community should not be allowed to grow beyond the local economy's ability to support otherwise they simply become dormitories. This size limit should be incorporated in the plan. Keeping economic activity & the associated workforce close together promotes both the business development & green objectives of the plan. Assuming the Daventry NE residential development takes place
- **Overstone PC** – (no comments)
- **Woodford Cum Membris PC** – (no comments)

The following Parish and Town Councils objected to spatial option 1h:

- **Flore PC**- We re-iterate here the point made in response to Q2 above. The proposal to use this site is specifically NOT 'logical'. It intrudes substantially into, and is entirely detrimental to, a special landscape area whilst this Strategy's Objective 3 Landscape is "To protect and enhance.... especially those valued landscapes which have been designated as special landscape areas". Glassthorpe Hill Is that an important landmark in West Northamptonshire and should be respected as such. Many formally attractive areas of landscape on the route out of Northampton have already been lost to westward development. It is important that this area is protected. In addition, Panettoni Park is already adding to the congestion on the A4500 into Northampton and is likely to benefit workers from outside the county as much as those from the town, while its incongruously white elevations already have a jarring detrimental impact on views from the western south. In order to retain the identity of Harpole and Kislingbury it is also important that a green swathes of open landscape is maintained which will also make the approach into Northampton much more attractive and appropriate to a town hoping to make itself more attractive to visitors and potential investors.
- **Harpole PC** - Harpole Parish council understands that the owner of much of this site wishes to retain the land for agricultural purposes and has no wish to accommodate further logistics development. The Parish Council objects to the proposed location for the following reasons:
 - The option is within a special landscape area identified in the South Northamptonshire Local Plan. The location of the site would result in large unsightly warehousing that would not be compatible with the special landscape character. The site is located in the Nene Valley and as such is visible from the surrounding hills and any development would have a significantly detrimental impact on the landscape setting.
 - This detrimental impact should be assessed against the generation of employment opportunities for the local economy. However, there would only be a small number of low paid warehouse and distribution jobs generated locally. The Oxford Cambridge Arc, which Northamptonshire is supposedly part of, is promoting highly skilled

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- employment opportunities. These should be the priority for employment opportunities across Northamptonshire.
- The visual impact and loss of vegetation and trees associated with the existing Panattoni Park demonstrates the inappropriate nature of this development and the impact that it has had on the landscape setting. The detrimental impact on the Special Landscape area should not be further compounded.
 - Concerned about the increase in large polluting vehicles through the parish. The community regularly use Weedon Road to access Upton Country Park, Kislingbury and Northampton, some by sustainable modes of transport such as walking or cycling. Many residents within the parish also live next to the busy Weedon Road and Sandy Lane. The development will inevitably increase the number of large HGVs through the parish. These vehicles are dangerous and increase air pollution.
 - The allocation offers few if any benefits to the parish. An alternative allocation to the south of the M1 at could provide direct access to Junction 16 for the existing Flour Mill, would remove a significant proportion of HGVs from village roads in three village Parishes and place the allocation further away from the special landscape area.
 - Despite further planned housing employee access to the proposed employment site is poor as it is relatively isolated from any potential workforce and access via sustainable means of travel is weak. As a result, most people will drive, as is currently the case with Panattoni Park. On that basis the site allocation should be considered unsustainable.
 - It is recognised that there is increased demand for large B8 distribution warehousing around Northamptonshire and the site is located within the so called 'Golden Triangle' considered the centre of UK logistics. If WNC was minded to continue with this allocation the following issues should be considered in terms of the policy supporting the allocation.
 - Landscape Setting
 - Environmental Impact
 - Building Design
 - Access
 - HGV Parking.
 - Restricted Village Access
 - Noise
 - **Nether Heyford PC** - Land north of the A4500 to the east of J16 and west of Sandy Lane, inclusive of the settlement of Harpole, should be retained as a green buffer zone to the overall growth of Northampton eastwards. This is the lower southern part of an escarpment which is an important rural asset. Employment development should continue to be focused on land to the south of the A4500 and east of the M1, excepting the flood zone and protected areas of the River Nene.
 - **Old PC** - Weaknesses outweigh strengths.
 - **Whittlebury PC** - It has potential, but this site was specifically removed by the inspector at the last South Northants Local Plan Part 2 – what has changed to include it now?

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The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Blakesley PC** – It has potential, but the site was removed by the Part 2 Local Plan Inspector. What has changed?
- **Brixworth PC and Strategic Planning Working Group** - Area within a Special Landscape Area! Thus, opposite to stated policy in Objective 3: To protect and enhance West Northamptonshire’s distinctive landscape character especially those valued landscapes which have been designated as special landscape areas.
- **Hackleton PC** - Spatial Options 1f, 1g & 1h Current development along the M1 corridor, the particular example being at M1 junction 15 is for predominantly warehousing. This brings with it low skilled, low paid jobs. This is not the development Northamptonshire should be concentrating on, we should be looking to attract high skilled jobs to the area. If we do continue with the warehousing developments, then low-cost housing will be a top priority. This will be out of step with what the developers want to provide. In order to regenerate and grow Northampton vacant and underused buildings should be developed for business using high quality urban design and business support schemes. Brown field sites should also be a priority so to prevent ongoing urban decay.
- **Hinton-in-the-Hedges PM** - Everything has a ‘potential’ – the question is whether it is morally right to do it – do the council taxpayers already there want it?
- **Kislingbury PC** - In relation to housing needs, it seems that housing ‘wants’ rather than housing ‘needs’ are being met. Meeting housing need means that West Northants residents would live in homes that they can afford, are warm and dry, green and fuel efficient, and enable children and families to flourish. To enable real housing need to be met, there should be construction of homes available on a variety of tenures including shared ownership. The use of the term ‘affordable’ on the Strategic Plan should be monitored and readers should be made aware that this really means prevailing market value. The use of Community Led and not-for-profit housing initiatives needs to be prioritised to address the needs of West Northants residents whose housing needs will never be met in a market-led context.
- **Little Houghton PC** - LHPC has insufficient local knowledge to comment specifically on identified sites. LHPC finds it difficult to agree with further expansion of the towns into rural areas without understanding the impact on heritage assets, conservation areas and existing infrastructure - in particular the highways network. Building on the flood plain MUST be avoided. The potential for using brown-fill sites and under used town centre buildings for both housing and employment should be urgently assessed, together with an exploration of the identified constraints. Sites already identified within the JCS should be progressed before further land is allocated for development.
- **Weedon PC** - This would be a most unfortunate ‘logical extension’ of the existing Panattoni employment area as it would mean that open countryside, which provides a green wedge between Northampton and villages such as Harpole and Kislingbury, would be breached leading to a spread of housing estates and the joining of such villages to the sprawl of Northampton town. In addition, despite improvements, the Weedon Road is becoming increasingly

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busy with gridlock at roundabouts at the Sainsbury's/Marks & Spencer area of Sixfields since the bus lane hours have been extended. This and the chaotic parking at Sixfields are a very big deterrent to shopping. It is often easier now to get to Towcester, Rugby or even Milton Keynes where there is more, and better parking coupled with more varied and accessible retail options.

- **Wootton PC** - Additional information required.
- **Yardley Gobion PC** - It has potential, but this site was specifically removed by the inspector at the last South Northants Local Plan Part 2.

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Question 17: Do you agree that there is potential for directing further development at Daventry, as a sub-regional centre, as part of the spatial strategy for West Northamptonshire?

- 278 respondents said 'Yes'
- 166 respondents said 'No'
- 257 respondents provided specific comments

Those respondents who supported the potential for directing further development at Daventry, raised the following key points:

- Daventry is a sustainable location with a suitable number of facilities and services capable of supporting growth. However, this spatial option should not be relied upon due to the previous undersupply of housing and lack of evidence to justify further growth.
- Daventry as a whole is able to be made bigger without as much damage to local villages. There is a lot less risk of villages being merged into the town centre like Boughton, Moulton and Overstone blending into Northampton.
- Any new developments will need to provide there is investment new schools and allow existing schools to be upgraded to meet modern standards.
- Could work if employment and housing were developed together to create a sustainable community.
- Development should be in conjunction with residents
- Area around Churchill Rd and London Rd has scope for industrial development
- Requires investment in transport infrastructure and needs comprehensive access and infrastructure improvements
- Only develop moderately, preserve outlying villages heritage, independence, and visual appeal
- Daventry was built as a new town and the whole area is ripe for expansion and development in conjunction with what has already been built there.
- Good road network and potential for distribution hub
- Infrastructure already in place to cope with new developments
- Better to locate industry on the West of Daventry where there is already large industrial areas and the road width and capacity to handle the traffic, ensure doesn't impact A5
- Care needs to be taken in the development of Daventry as existing development has moved away from the town centre in pretty much one direction, creating an off-centre town. The housing developments are largely a community of commuters.
- There has been little development of employment opportunities locally for some years following initial development of Daventry
- Strategy included within the Settlements and Countryside Local Plan
- Strong economic centre which could be effectively developed as the secondary hub. Good road networks and links to other areas.
- Daventry appears to have the capacity for further development and appears more aligned with achieving the clean and green credentials of the plans' proposed vision. However, their viable delivery at this location needs to be proven.

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- Reliance on a single site to deliver such a significant proportion of Daventry's housing supply is a concern but providing that it can be demonstrated to meet the test of being deliverable, then other sites in other nearby locations and settlements could underpin housing/ affordable housing delivery to assist in smoothing out any potential delays.
- To ensure housing delivery risk a range of sites and sizes should be allocated.
- There is a need for secondary schooling and social housing
- Daventry and its surrounding areas have developed a real strategic advantage within the UK for the industries it supports, taking advantage of its geographical location.
- Further development should be directed towards Daventry as it is a sub-regional centre and should be a key component part of the strategy up to 2050.
- Daventry has the infrastructure (including railway station), facilities and roads to successfully enlarge.
- Other towns within Northamptonshire should carry some of housing burden however there is a risk to Daventry being ruined
- Daventry and South Northants tried to put all their development at the fringes of the old Borough, next to Northampton. Time for Daventry to have its share of development!
- Link development to existing towns including Daventry.
- Clear advantages to Daventry, if it is decided that growth is required but not assumed it is a necessity.
- Daventry big enough to support mix of commercial and residential expansion without losing its identity
- Potential to become a large town independent from Northampton and Milton Keynes
- With adequate infrastructure in place. In particular: There may be insufficient permitted capacity at Water Recycling Centres to accommodate additional foul flows. The Water Companies will need to consider future growth giving regard to the capacity in the sewerage network, to allow them to make medium and long-term infrastructure plans, where necessary. Any new developments will need to follow the Water Framework Directive (WFD). Water cycle studies may be required/refreshed. Without this there may be concerns regarding increased risk of flooding; pollution of the water environment; surface or groundwater infiltration.
- Further detail required on impact on social infrastructure (doctors, school, police, fire, hospitals)
- Long Buckby could be a good location for further development. Provided there was suitable infrastructure including safe foot and cycle access from Long Buckby station to Daventry town centre, affordable housing and traffic improvements, education contributions.
- Must consider impact on surrounding countryside and villages as well as social infrastructure such as doctors and schools
- Whilst there is a base for police and fire and rescue services in Daventry, there is still a concern about the ability to attend incidents in a timely manner and within published timescales, without adequate infrastructure to serve the

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developments. These proposals would have a significant impact on police and fire operations from Daventry fire and Police station.

- Essential if West Northants is to build its own identity. Otherwise, services and amenities will continue to focus elsewhere, not necessarily benefiting Northamptonshire.

Those respondents who objected to the potential for directing further development at Daventry, raised the following key points:

- Daventry Town Centre is far too small for the amount of housing it has now without adding more.
- Parking in Daventry is difficult now without adding more people with the proposed extra housing and factories.
- There has already been far too much unattractive housing development here.
- Environmental impact on the beautiful countryside between Daventry and Braunston, including impact on The Jurassic Way, Kettle Woods and landscape from Braunston and Flecknoe will be completely overshadowed.
- Impact on the A45 (level of traffic and safety concerns)
- Coalescence between Daventry and surrounding villages Norton, Welton and Braunston, making Braunston in particular a suburb of Daventry (5 respondents)
- Northampton would be a better option
- How do you intend to see Daventry grow as a town /city? how does this fit into the overall thinking about Daventry, its regeneration and the future overall 'shape' of the town, community, and associated facilities
- Daventry has many residents that out commute for work on the road network that is heavily congested. This will increase pollution, which will cause harm to the residents and environment.
- The town currently does not have the essential services needed for the current number of residents
- There is no option around Daventry where housing can be built and should be removed.
- Develop the urban areas of Daventry, concentrating on the brownfield/ urban areas.
- Impact on traffic and environment will make it unsustainable (x2)
- Local residents should have a say (vote) on the matter
- Why create two regional centres? Concentrate on Northampton rather than allowing Daventry to sprawl into the conservation areas
- While there may be opportunities for further development at Daventry, existing allocations for residential development mean that the town is already on course for a very large increase in its population. The questions should be (1) whether Daventry can cope with an increase on this scale, and (2) whether it should be asked to do so.
- Existing expansion plans were made before the District Council had seriously considered the implications of the threat of climate change and the land allocations of the existing Joint Core Strategy should therefore be reviewed.
- Daventry is 'characterised by a well-defined network of green infrastructure'. One of the defining characteristics of the town, is an extensive green area, bordered by trees, yet one of DDC's last acts was to offer this area for the

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building of a school, Given the need to develop green areas to absorb emissions and to improve the environment for health reasons (including mental health), the decision to build on this site appears to be totally at odds with WNC's commitments on climate change and with the objectives of the new Strategic Plan.

- Concentrate employment on existing industrial estates
- Daventry has already had too much development
- Travel links are poor relying on Long Buckby Railway station
- Negative impacts on environment and climate change
- Any developments would be better realised in the environs of Northampton or to the South East of Daventry with access link or near M1 junction proximal to Flore.
- This option increase traffic congestion, more pollution and damage to the local environment as people travel to this area to work and loss of green spaces.
- No rail station for high-capacity sustainable transport development. Local roads going north to the M1, and the A45 towards Coventry, already carry substantial traffic including many large HGVs. Daventry still retains some of its previous market town character. It is contradictory to propose Daventry as a sub-regional centre and target it for economic expansion; this will destroy its remaining market town characteristics.

Comments made by respondents who did not specify 'yes' or 'no'

- Any further growth of Daventry needs to have comprehensive access and infrastructure improvements to support it
- Industry and further residential development appropriate
- Important to recognise that Daventry and Northampton Borough previously allocated land within their Part 2 Local Plans, whilst South Northamptonshire District made no housing allocations in their Part 2 Local plan.
- Rural housing requirements for Daventry have been met based on analysis of future trends
- Maybe some limited capacity. Daventry needs to be a more balanced community with less emphasis on warehousing employment, and better public transport connectivity before accepting significant amounts of new development.

Parish and Town Councils Responses

The following Parish and Town Councils supported the potential for directing further development at Daventry:

- **Braunston PC** - Daventry should supply its share of land for residential and employment development, where a need is identified in the West HENA, the current consultation does not present options. Land parcels to the south west of Daventry should also have been included as options, allowing consultees a choice of sites for further housing development or the option of proposing a combination of parts of more than one site. An additional map should be provided in future documents showing all the spatial options (residential and employment) around Daventry on a single map, to assist consultees in understanding the overall context. Clearer statements should be included on how the site selection/assessment criteria in the SLAA, and SA have been

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applied specifically to the sites around Daventry. Both land to the north and west of Daventry (sites 16, 18 and 19) included in Spatial Options 2a and 2b and rejected sites east and south east of Daventry (sites 15 and 17) are subject to numerous environmental and landscape constraints and it is not clear why viable residential sites could not have been identified to the south east, with boundaries drawn to take account of key constraints (such as the presence of scheduled monuments). This would have given consultees real choices of options for meeting the residential development need.

- **Brixworth PC and Brixworth Strategic Planning Working Group** - This strategy is included within the Settlements and Countryside Local Plan
- **Cogenhoe and Whiston PC** (no comments)
- **Greens Norton PC** - Any further growth of Daventry needs to have comprehensive access and infrastructure improvements to support it
- **Kingsthorpe PC** - Spreads development around the area, encourages more diverse businesses.
- **Long Buckby PC** – yes, assuming the Daventry NE residential development takes place.
- **Nether Heyford PC** (no comments)
- **Old PC** - Summary identifies possible options for further development, if on a limited scale.
- **Overstone PC** - Facilities and infrastructure are already established. The population of Daventry is approx. 26,000 the predicted population of Overstone Parish is 12,000 plus. Daventry is far better served than Overstone and therefore will easily be able to accommodate a further 5-6000 homes.
- **Walgrave PC** - Facilities and infrastructure are already established, it would appear that there is further opportunity to develop the area further.
- **Welton PC** - Of course there is potential for further development but only with topographic consideration.
- **Woodford-cum-Membis PC** (no comments)

The following Parish and Town Councils objected to the potential for directing further development at Daventry:

- **Culworth PC** (no comments)
- **Daventry Town Council** - Daventry is currently not well-connected. There is no easy access to the rail network, bus routes are limited and infrequent. The road network, especially the key 'A' roads are narrow and not suitable for heavy goods vehicles. Existing commercial areas are already beginning to envelope the Town's residential areas, resulting in increased air pollution. Daventry has to be considered as an area that needs to look at air quality and make this a key factor in any decision making that relates to increasing large commercial areas. The Town needs to look at economic growth from a technology and office provision perspective, and subsequent residential development for employees working in that work environment.
- **Flore PC** - Any further development would have to include an enormous amount of input to improve the quality and ambience of the town and its offer to visitors, residence, shoppers, tourist, and leisure seekers.

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- **Moulton PC** - Much more residential development not accompanied by economic opportunity.
- **Weedon PC** - Not until some consideration is given to making any new development of a better quality than in the past. It does not operate as a sub-regional centre as residents of surrounding villages look to pleasanter locations further away e.g., Towcester even for the weekly shop. We do not feel proud to identify Daventry as our local centre.

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Blakesley PC** - Any further growth of Daventry needs to have comprehensive access and infrastructure improvements to support it.
- **Easton Neston PM** – Unable to comment
- **Hinton-in-the-hedges PC** - Everything has a ‘potential’ – the question is whether it is morally right to do it – do the council taxpayers already there want it?
- **Kislingbury PC** – decline to vote for particular options
- **Little Houghton PC** - finds it difficult to agree with further expansion of the towns into rural areas without understanding the impact on heritage assets, conservation areas and existing infrastructure - in particular the highways network. Building on the flood plain MUST be avoided. Sites already identified within the JCS should be progressed before further land is allocated for development.
- **Wootton PC** – Additional information required
- **Yardley Gobion PC** - Any further growth of Daventry needs to have comprehensive access and infrastructure improvements to support it.

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Question 18: Do you agree that spatial option 2a – North of Daventry – has the potential to deliver residential development?

- 237 respondents said 'Yes'
- 209 respondents said 'No'
- 251 respondents provided specific comments

Those who supported spatial option 2a, north of Daventry raised the following key points:

- With the appropriate services this could create c2000 houses and with developer contributions provide infrastructure and local services for existing and new residents
- It will require infrastructure to support it
- Agree provided top right corner field bordering the A361 and Welton Road is removed as it will encroach too far into open countryside
- Infrastructure is already there to cope with new developments
- It would need to be close enough so that new people could access the town centre facilities.
- The connectivity to Daventry and existing cycle and walking routes would be good, however the size of development will start to encroach on other neighbouring villages.
- Daventry could become a larger town, independent from Milton Keynes and Northampton.
- Provided this is done in a sensitive way and a sustainable timeframe.
- Connects well with existing and planned development
- Investment in key routes to the town centre are a priority and community facilities to prevent these residential areas becoming isolated and dormitory.
- Development must be of a design that blends in with and complements the surrounding landscape and canal heritage.
- It has potential but further demonstration of how and with what impact on surrounding area needs to be undertaken prior to any decision.
- Using the canal as a cycle route or walkway would enhance its focus, as it has done in many other areas.
- Needs to have links with the railway
- This option is shown on the flood map as within flood zone 1. There are ordinary watercourses located on the site which have not been modelled, however this should not prevent the site from being developed. This option is adjacent to the Whilton Water Recycling Centre sewerage catchment which we assume would take the foul flows from this developments. The data available suggests that there is Dry Weather Flow (DWF) capacity at the works to accommodate the foul flows from this development.
- This would build on development at Micklewell Park
- Limited scope to consolidate development west of the A361 and North of Middlemore exists, subject to effective integration with the existing built form
- A361 is the main public transport corridor between Daventry and Rugby. It also directly serves DIRFT, with journeys timed to ensure shift changes are

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covered. As such it is an area that in part could take advantage of reasonable public transport options, and help support further improvements

- The pedestrian integration of this option with Middlemore will also be crucial and could help areas more distant from the A361 benefit from existing bus services, as well as other facilities in reasonably close proximity. The potential to provide good pedestrian and cycling links to major employment to the south west is another substantial advantage. It is also one of the very potential areas of extension that avoid significant landscape and topography constraints around the town.

Those respondents who objected to spatial option 2a, north of Daventry raised the following key points:

- Area can't support development here.
- Extend the existing allocated site to the existing strategic commitment to the east of the A361 instead
- Explore new potential for development on the southern entry to Daventry District Council
- Not suitable due to the topography of land.
- Development here means any housing will severely impact the views and landscape from Braunston
- Coalescence between Braunston and Daventry together which should not be allowed to happen - there should be a visual separation between settlements.
- Traffic impact on Braunston would become much busier with traffic as this would be the cut through for all wishing to get to the A45 (as seen when A361 had a temporary closure).
- There is a wooded area Middlemore Gorse which should be kept as this is a home for wildlife and there is already enough deforestation in this world today.
- Negative impact on heritage to the canal conservation area and grade 2 listed tunnel
- A little extension here would be reasonable, but not nearly as much as proposed
- Proposed sites look very much like an almost random addition to the town – going beyond the current boundary and stretch towards Braunston.
- Alternative sites along the A45 would have seems more in keeping with maintaining the integrity of both Daventry town and the villages surround it.
- Already lots of new homes, not all of which have been filled
- Impact on and increase in traffic, including more HGV's, and safety concerns associated with that.
- Impact on junctions with A361
- Encroachment of Daventry onto Braunston and the negative impact it will have on the view looking back towards Daventry.
- Potential impact on the setting of All Saints Church in Braunston as well as t views from Braunston and also long-distance views to the west where Kentle Wood.
- Value of Kentle wood for landscape, biodiversity and well being
- Part of this area is identified as a green wedge in the Daventry Settlements and Countryside Local Plan, which requires proposals to maintain the physical and visual separation between settlements.

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- The topography could have impact on format of buildings in this option which could further increase the landscape impact.
- A local wildlife site is situated to the south (not within site boundary) and the southern corner of the area forms part of the special landscape area.
- Impact on the Jurassic Way long distance footpath, its enjoyment would likely be affected by the development of this site.
- Local employment opportunities are largely on mature industrial estates which are becoming limited in number.
- This will create dormitory accommodation for commuters.
- Focus on large towns
- Excessive urban sprawl from Daventry, already too much creeping up the A361 and A45
- Option does not have the potential to deliver the housing required as a singular option.
- Option is disproportionate in its size
- Braunston will become a suburb to Daventry when it should remain a village
- Must use brownfield sites first
- Expansion of Daventry towards Weedon
- An area of land should be retained to ensure Braunston would never be connected to Daventry to form a suburb. Braunston is and should remain a village.
- Tourism in Braunston is high due to our scenic location and amenities. It will be impacted by development
- Expansion of Daventry should be towards Weedon, Staverton, Newnham or south east of Daventry.
- Daventry has already experienced a lot of development at Lang Farm, Monksmoor, Middlemore, now Micklewell Park.

Comments made by respondents who did not specify ‘yes’ or ‘no’:

- This site lies to the north of Drayton reservoir and straddles the line of the Braunston tunnel. The canal is designated as a conservation area, A detailed heritage assessment looking at both direct impacts and indirect impacts where there may be effects on the setting of listed buildings and the character and appearance of the conservation area would be required
- High-density development would be of concern as the tunnel and its setting are an important feature of Braunston creating a visual sense of arrival into the village. The zone of influence of the tunnel varies dependant on the depth of cover but generally we ask for no development within a stand-off distance equal to the depth to the invert of the tunnel on both sides of the tunnel line. Any construction access roads should cross the tunnel perpendicularly and avoid any former construction shafts which will need to be investigated.
- Natural drainage should not be significantly altered to ensure there are no additional inflows or shrinkage. Any proposals would therefore need to retain a buffer from the tunnel, taking account of the above and allowing for access to ensure the preservation of any below ground archaeology such as horse tracks etc that ran alongside the tunnel.

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- The canal would provide linkages from the site to both and improvements to the towpath surface, width, and access points to support this additional use should be a requirement for any development of this site.
- Unclear why specific development types have been identified. Mixed use sites for example offer a more sustainable solution than independent employment and residential areas that require longer journeys to reach

Parish / Town Council Responses

The following Parish and Town Councils supported spatial option 2a:

- **Blisworth PC** (no comments)
- **Brixworth PC and Strategic Planning Working Group** - Strategy included within Settlements and Countryside Local Plan. Create a sympathetic feature of the canal area. Maintain the green wedge between Daventry and Braunston if possible.
- **Culworth PC** (no comments)
- **Daventry Town Council** - If further development is required within the parish of Daventry, this area does connect well with existing and planned development. Investment in key routes to the town centre are a priority and community facilities to prevent these residential areas becoming isolated and dormitory. Development must be of a design that blends in with and complements the surrounding landscape and canal heritage.
- **Long Buckby PC** - More evidence of some serious investigation of the proposed sites. Not just a few bald facts available from the internet. A thriving community should not be allowed to grow beyond the local economy's ability to support otherwise they simply become dormitories. This size limit should be incorporated in the plan. Keeping economic activity & the associated workforce close together promotes both the business development & green objectives of the plan. Assuming the Daventry NE residential development takes place
- **Overstone PC** - This 1200 is less than Daventry could take but would be good as part of the 5-6000 homes suggested.
- **Walgrave PC** - Facilities and infrastructure are already established, it would appear that there is further opportunity to develop the area further.

The following Parish and Town Councils objected to spatial option 2a:

- **Braunston PC** - Concern that the proposed spatial option would adversely affect the Grand Union/Oxford Canal Conservation Area as well as adversely affecting the setting of the listed tunnel portal and listed buildings in Braunston. It would also erode the gap between Braunston and Daventry, in contravention Local Plan and Neighbourhood plan .>We propose that Spatial Option area 2a should be replaced with a smaller site extending only as far north as a buffer zone established along the southern boundary of the Grand Union/Oxford Canal Conservation Area, with a second development area south east of Daventry, close to the A45 where there is more public transport, could be included in the proposals as land for residential development. Access to the northern part of the site as proposed in the consultation document would rely on the A361 for access. This road is already overloaded,

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and the problem will be exacerbated when the Micklewell Park development is completed. And would cause unacceptable congestion affecting access to employment and services. The area proposed as lies within land mapped as having a high to moderate probability of falling into the category of best and most versatile (BMV) agricultural land, so development would erode the local sustainable agriculture resource.

- **Courteenhall PC** - For the reasons of weakness identified in the consultation
- **Flore PC** (no comments)
- **Old PC** - Weaknesses outweigh strengths.
- **Weedon PC** - NO because of risk to heritage assets and historic landscape. The Parish Council is opposed to these options because of the adverse impact on the historic site of Braunston
- **Welton PC** - This potential area for development falls again within Welton Parish who have accommodated both Micklewell H03 and H02. This potential area contravenes Welton Neighbourhood Plan 2018-2029: Surrounding Landscape Character 4.27, Vision and Objectives 6.3, 6.5, 6.6 and is not supported within Daventry Urban Fringe 4.28, 4.29, 4.30, 4.32 and Key Views 4.33. More consideration is necessary in the area around H01.

The following Parish and Town Councils did not specify 'yes' or 'no':

- **Hinton-in-the-hedges PC** - Everything has a 'potential' – the question is whether it is morally right to do it – do the council taxpayers already there want it?
- **Kilsby PC** - Any expansion of Daventry to the North will increase traffic on the A361. This road splits Kilsby village and is already highly dangerous. It currently acts as a route for a higher-than-average number of HGVs.
- **Kislingbury PC** – Decline to vote for particular options.
- **Little Houghton PC** - LHPC has insufficient local knowledge to comment specifically on identified sites. LHPC finds it difficult to agree with further expansion of the towns into rural areas without understanding the impact on heritage assets, conservation areas and existing infrastructure - in particular the highways network. Building on the flood plain MUST be avoided. The potential for using brown-fill sites and under used town centre buildings for both housing and employment should be urgently assessed, together with an exploration of the identified constraints. Sites already identified within the JCS should be progressed before further land is allocated for development.
- **Whittlebury PC** - Don't know. Difficult to comment as no knowledge of these areas
- **Wootton PC** – Additional information required.

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Question 19: Do you agree that spatial option 2b – North and West of Daventry – has the potential to deliver employment development?

- 234 respondents said 'Yes'
- 205 respondents said 'No'
- 247 respondents provided specific comments

Those who supported option 2b – North and West of Daventry raised the following key points:

- Close to the M1 for transport
- Good transport links however if houses were added to nearby sites this would create sustainable communities.
- Provided it was limited so ensured that Jurassic Way was protected
- Growth west of Daventry
- Daventry and its surrounding areas have developed a real strategic advantage within the UK for the industries it supports, taking advantage of its geographical location. The County should look to continue to exploit this competitive advantage.
- Site promoter welcomes their land being included within the option and supports the promotion of the land for employment development. Land to the north and west of Daventry presents a logical extension to Daventry and the successful Royal Oak industrial Estate. If the option were to come forward for development, suitable mitigation could be secured as part of a future scheme to ensure appropriate measures are put in place to reduce any harm.
- This option is shown as within flood zone 1. There are ordinary watercourses located on the site which have not been modelled, however this should not prevent the site from being developed. This option is adjacent to the Whilton Water Recycling Centre sewerage catchment which we assume would take the foul flows from this developments. Different employment services can generate vary different volumes and qualities of effluent. There is some Dry Weather Flow capacity to accept flows from this site however some activities may cause it to be limited.
- It may be better to incorporate the housing proposed in Spatial Option 2a at this location, extending westwards, rather than risk coalescence between Daventry and Braunston. The development of housing close to employment areas should be made a priority.
- Modest extension to the existing industrial area
- Proposals will have a significant impact on police and fire service operations from Daventry.
- Landowner considers that land within spatial option 2b has the potential to deliver employment land to support the evidenced local need in Daventry. Prologis is seeking to promote the part of Spatial Option 2b which lies to the north of the A45 and would comprise an expansion to the existing and successful Prologis Apex Park Estate.
- The proposed expansion of Apex Park is a logical location for additional employment land in Daventry. The proposed area promoted by Prologis is appropriate in scale and character to the existing industrial park on the edge of the town. It is considered that the parcel of land would also facilitate a number of important social, physical, and environmental benefits.

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- Christ Church supports the identification of its land interest within Spatial Option 2b and the potential for the site to deliver a sustainable form of employment development at Daventry. The existing infrastructure, coupled with the potential for enhancements to this through delivery of a sustainable urban extension, justify further consideration of this development option.
- Now is an opportunity to establish a truly sustainable approach which considers the plan area as a whole rather than the former sum of its parts (Northampton, Daventry, and South Northamptonshire). To this end, it is considered that greater consideration should be afforded to neighbouring authority areas, which will influence the spatial pattern of economic development, for e.g., the needs arising from the Arc in the south and those areas experiencing high levels of growth in the north, Rugby Borough

Those who objected to spatial option 2b – North and West of Daventry raised the following key points:

- Too close to green spaces, look at Brownfield sites such as the hotel/scrap yard south east of Daventry.
- It would impact on Braunston in terms of traffic (increase in volume and safety), light and noise pollution and visual impact on Braunston due to the topography
- Impact on the local landscape and long distant views would be completely ruined, currently Kettle Wood defines the western edge of Daventry and this is a strong landscape feature
- The Jurassic Way an 88-mile public right of way runs through the proposed site, the enjoyment of this would be ruined and impact negatively on local biodiversity.
- A visual separation should be maintained between Daventry and Braunston – proposed option builds too close to Braunston. Encroachment on the green wedge
- Use of greenfield land is inappropriate
- Proposed site on the west of the existing industrial area is reasonable, but not the relatively small extension to the northern industrial site as it already spoiling the visual appeal from Braunston to residents and visitors/tourists due to massive warehouses with no consideration to building natural looking barriers,
- Would cause coalescence between Daventry and Braunston and add to the cumulative impact of other developments
- Impact on the heritage areas of Braunston including the canal conservation area and the village's setting
- Negative impact on natural environment, landscape and biodiversity and agricultural land
- Not clear of how Daventry will grow as a town /city? And how this fits into the overall thinking about Daventry, its regeneration and the future overall 'shape' of the town, community, and associated facilities
- Negative cumulative impact of developments on views from Braunston, including night light pollution
- Growth at Northampton would be a far better option

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- Overdependence on logistics – warehousing will become automated and will require less employees. Consideration of low-rise buildings for manufacturing purposes more suitable.
- Excessive urban sprawl from Daventry creeping up the A361 and A45
- No reference to support infrastructure
- Developer driven development has no place in strategic planning
- Mixed use sites for development offer a more sustainable solution than independent employment and residential areas that require longer journeys to reach.
- The option is 90ha, the shortfall of employment land in HENA is 26.6 ha, which would result in an over provision of employment land.
- The topography would result in visually intrusive development impact on the surrounding countryside and villages.
- Better option is to plan for employment area to the north east of A45
- Not considered an appropriate direction for development. It represents urban sprawl and directs development away from existing and credibly achievable public transport provision - the existing employment areas on this side of the broadly do not own offer existing public transport services. It would not represent an easy location to provide relevant public transport choices to. In fact, the significant gradients are also likely to make walking and cycling routes rather less attractive too.

Comments made by respondents who did not specify ‘yes’ or ‘no’:

- Growth at Northampton, Daventry, Wellingborough, and Kettering
- Although set back from the canal the potential visual impacts to its current rural setting would need to be considered. The canal towpath is an important traffic free route for walking / cycling for both leisure and utility walkers and could provide a commuter route to neighbouring urban areas. The impacts of any increased use would need to be considered and as with Spatial option 2a improvements to the towpath surface, width, and access points to support this additional use should be a requirement for any development of this site.
- There is an opportunity to establish a truly sustainable approach which considers the plan area as a whole rather than the former sum of its parts (Northampton, Daventry, and South Northamptonshire). To this end, it is considered that greater consideration should be afforded to neighbouring authority areas, which will influence the spatial pattern of economic development e.g., the needs arising from the Arc and in Rugby Borough.
- This site would be a likely objection from Historic England. The proposal would impact on views of Braunston and the scheduled monument of Braunstonbury deserted medieval village (1017580), together with NN19829 - Earthworks of medieval/post-medieval ridge and furrow, part of the open field system of Braunston. Harm is also likely to be high to the scheduled monument at Flecknoe due to its Saxon origins and hilltop location with open landscape around forming an important part of the experience. Due to the topography and contours of the area, impact is likely to be high. If taken forward for further assessment, a better understanding of landscape in relation to the Scheduled Monuments would be required to understand impact on setting and whether harm can be managed.

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- Lack of proximity to good road or rail lines – access and infrastructure improvements are required.
- Based predominantly on topography but also on the distance and physical separation of this land from the nearest residential properties at the town must be concluded that this land is entirely unsuitable for additional commercial development, particularly of the type proposed on our client's land.
- The entirety of the employment land lies within a current 'Green Wedge' The development of this part of the site would therefore be strongly at odds with the Council's concerns in respect of visual coalescence with Braunston village
- A further point is that the site is likely on the wrong side of Daventry if there is any intention for future employment land at the town to 'plug in' to the growth along the M1 corridor. Indeed, logically the majority of commercial traffic will likely look to access the north south M1 corridor to the east presenting the south-eastern edge of the town fringing the A45 as the most logical location for further employment uses.
- Spatial Option 2b suffers from significant physical constraints that would severely restrict the areas of the site where development is appropriate, if not sterilise it entirely.

Parish and Town Council Responses

The following Parish and Town Councils supported spatial option 2b:

- **Blisworth PC** (no comments)
- **Brixworth PC and Strategic Planning Working** - Maintain the green wedge between Daventry and Braunston if possible.
- **Cogenhoe with Whiston PC** (no comments)
- **Greens Norton PC** - This site appears to be unsuitable for employment as it will be B8 distribution centres and not in any proximity to the road or rail networks. Access and infrastructure improvements are required to make this viable.
- **Long Buckby PC** - More evidence of some serious investigation of the proposed sites. Not just a few bald facts available from the internet. A thriving community should not be allowed to grow beyond the local economy's ability to support otherwise they simply become dormitories. This size limit should be incorporated in the plan. Keeping economic activity & the associated workforce close together promotes both the business development & green objectives of the plan. Assuming the Daventry NE residential development takes place
- **Overstone PC** - Daventry will need increased employment for the residents of the new SUEs
- **Welton PC** - Any industrial expansion will create employment. However, this is at the expense of the Green Wedge being infringed and its purpose to restrict the spread of built development beyond prescribed settlement boundaries and allocated sites jeopardised. Furthermore, the wildlife corridor from Swinnel and Middlemore Gorse to neighbouring parish of Welton will impact on the already affected area by development at Micklewell. WNC Tree Policy must be observed, and Light Pollution cannot be ignored. The topography of this development, increase of traffic on the A45 notorious for accidents, disregard of the Jurassic Way and historical Braunston Tunnel do not make this a suitable location.

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- **Woodford-Cum-Membris Parish Council** (no comments)

The following Parish and Town Councils objected to spatial option 2b:

- **Braunston PC** - We have commented separately on three parts of the site as shown on map Daventry 2b map.jpg; as constraints on each of the areas are very different. Area A – delete this area (west of existing industrial estate and north of A45). As development here would increase the existing adverse visual impact of the industrial estate on the local landscape and views from Braunston, encroach on the green wedge and result in coalescence with Braunston in direct contravention of the Local Plan Part 2 and the made Braunston Neighbourhood Development Plan (Policy G). Area A is not required to fulfil the identified need for employment land, which could all be met within Area C. Area A should therefore be deleted. Area B– Delete the finger of land along A45, as it would represent ribbon development and it would also eliminate completely the gap between Braunston and Daventry causing direct coalescence with the Old Road/Hill Row area of Braunston, in contravention of the adopted Daventry Settlements and Countryside Local Plan (Policy ENV1) and the made Braunston Neighbourhood Development Plan (Policy G). Area B is not required to fulfil the identified need for employment land, which could all be met within Area C. Area B should therefore be deleted entirely from Spatial Option 2b. Area C - reduce the size to meet only the identified demand (the currently identified option 2b [A+B+C] provides 90 ha of capacity, while the need is only 26.62 ha according to the HENA). The resultant site should be a much smaller, roughly rectangular site north and east of the golf course and entirely south of the access road to Berryfields Farm and east of the Jurassic Way, not intruding into the special landscape area to the south west, with access only via Browns Road. Any extension of the site towards A425 should ensure existing community sports facilities and the green wedge between Daventry and Staverton are protected. A woodland screening buffer zone for the Jurassic Way long-distance footpath should be provided along the western boundary and there should be a requirement to retain and protect the existing Kettle Wood (managed by the Woodland Trust). Further comments Braunston PC has answered ‘no’ to this question because of the lack of demonstration of need for the area as it is presented (see below). With the option reduced to match the identified need, located within the southern part of Area C, our response would be ‘yes’, subject to the amendments and conditions proposed. The area shown in Spatial Option 2b is a gross overprovision (of 90 ha) set against the need identified in the HENA and shown in Table 1 on page 8 of the consultation document of 26.62 ha (which already includes a 23% margin for ‘flexibility’). It appears that the boundary of the site has been drawn simply based on land availability with no appraisal of need or suitability or compliance with the adopted Daventry Settlements and Countryside Local Plan or Braunston Neighbourhood Plan. Area A, and to some extent Area B would be highly visible from Braunston and from Warwickshire as this land is on the watershed of England, exacerbating the already significant adverse impact of the existing Drayton Fields Industrial Estate on views from Braunston village and would affect the setting of many listed buildings in the village (not only All Saints Church, which is mentioned in the consultation document). Area A would also erode the green wedge defined in Daventry Settlements and

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Countryside Local Plan (ENV3) and both Area A and Area B would be inconsistent with Policy ENV1(B)(iv) of this plan, which is to avoid physical and visual coalescence between settlements, and with the made Braunston Neighbourhood Development Plan Policy G, which specifically mentions preventing coalescence between Braunston and Daventry. The consultation document states as strengths that the site is adjacent to existing industrial estates and therefore can link to existing infrastructure which includes public transport. While the link to existing industrial estates applies to Area A and Area C, this is not the case for Area B. Note also that there is no public transport on most of the A45, so Area B and Area C have no public transport links. The document also mentions a cycle link to Daventry town centre (and in the short term also to Braunston) via the former railway line. Note that the link to Braunston is not currently in place and it is not proposed that it will use the former railway line.

- **Daventry Town Council** - The proposed extension of the existing industrial sites to the north and west of Daventry would challenge the Local Plan – Part 2, in relation to the green wedge area adjacent to land already identified (EC7) for development. The linear strip of woodland, known as Kettle Wood, would be consumed by the proposed commercial development, when this area should be identified as an area to expand the green infrastructure, planting more trees to encourage wildlife and help to address the issue of climate change. This proposed area also adjoins the Braunston Covert an identified local wildlife site, which currently sits in open countryside. The landscape in this area is an important visual asset traversed by the Jurassic way, an ancient ridgeway traversing Britain. It's a popular walk for ramblers, leaving from Charwelton to Braunston, a distance of approximately 9 miles (14.48 km). It is important to preserve the visual heritage of this area and protect the countryside from encroachment of any type of development.
- **Old PC** – Weaknesses outweigh strengths
- **Weedon PC** – Due to risk to heritage assets and historic landscape. The Parish Council is opposed to these options because of the adverse impact on the historic site of Braunston

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Blakesley PC** - This site appears to be unsuitable for employment as it will be B8 distribution centres and not in any proximity to the road or rail networks. Access and infrastructure improvements are required to make this viable.
- **Hinton-in-the-Hedges PC** - Everything has a ‘potential’ – the question is whether it is morally right to do it – do the council taxpayers already there want it?
- **Little Houghton PC** - LHPC finds it difficult to agree with further expansion of the towns into rural areas without understanding the impact on heritage assets, conservation areas and existing infrastructure - in particular the highways network. Building on the flood plain MUST be avoided. The potential for using brown-fill sites and under used town centre buildings for both housing and employment should be urgently assessed, together with an exploration of the identified constraints. Sites already identified within the JCS should be progressed before further land is allocated for development.
- **Wootton PC** – Additional information required

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- **Yardley Gobion PC** - This site appears to be unsuitable for employment as it will be B8 distribution centres and not in any proximity to the road or rail networks. Access and infrastructure improvements are required to make this viable

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Question 20: Do you agree that there is potential for directing further employment development at M1 Junction 18 as part of the spatial strategy for West Northamptonshire?

- 274 respondents said 'Yes'
- 161 respondents said 'No'
- 435 respondents provided specific comments

Those who supported the potential for further employment at M1 Junction 18 raised the following key points:

- Could create employment hot spot, with houses to southwest to create a local employment pool.
- Acceptable provided it considers neighbouring villages - with buffer zones that protect Kilsby, Crick and Yelvertoft.
- Provided that there is protection of wildlife areas, landscape, and natural environment
- There are tranches and pockets of land that appear to be suitable
- Warehousing and industrial development should be concentrated in the whole Dirft area and not spread across the rest of West Northamptonshire. Makes an ideal location with good rail links and access to M1.
- Good existing rail and road network and access (M1, M6, A14)
- Add to the enhancement of development of Northampton
- It clearly makes commercial sense to enhance the DIRFT complex. However, DIRFT is remote from major local population centres so generates commuter traffic. Surely there is an opportunity for a rail commuter service (perhaps limited to shift change times) from Northampton and Rugby to supplement the existing (limited) bus service and to ameliorate traffic growth.
- Also, essential that there is a link to access junction 19 of the M1 from and to the A14 south of the M1/M6/A14 interchange, otherwise "satnav" directs trucks through the villages to "cut the corner". This was major oversight and must be addressed if this area grows further.
- Best strategic option location as it is within the core of the "Golden Triangle" and benefits from the success of DIRFT. It has excellent rail connectivity to both the West Coast Mainline fast and slow lanes and remaining motorway capacity at J18 of the M1. It is also close to the A14 route to Felixstowe and has demonstrated strong market performance, with DIRFT3 continuing to attract large lettings and with space consistently being taken up at higher rates than elsewhere in the locality.
- Incorporate housing to the South and North East of it. The site for Employment could be reduced on the eastern edge to avoid having an adverse impact on the village of Lilbourne Meadows. Good natural screening should be part of the overall strategy throughout – also to increase carbon absorption, especially as large swathes of grassland are being commandeered.
- DIRFT is a successful logistics development providing significant employment. Given the continuing shift towards an online economy, it is essential that sufficient employment land is provided to continue the controlled

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expansion of high-quality sustainable logistics parks. However, impact on surrounding villages must be minimised.

- Expand Daventry as a second hub
- Support to the text within the Section ‘Spatial Option 3’ of the Consultation Document that states ‘This location is strategically located at the heart of the road and rail network and is well placed in relation to the logistics “golden triangle”.
- The effective expansion of DIRFT makes sense but the distance between the development and Yelvertoft must ensure no serious conflicts in terms of view, traffic, or other environmental issues. This is a much better alternative than developments at Junction 15 and 15A.

Those who objected to further employment at M1 Junction 18 raised the following key points:

- This area is already over-developed (DIRFT and Houlton), and this option would turn it into a vast industrial complex, swamping the villages of Yelvertoft, Lilbourne and Crick.
- Option 3a will not deliver employment as the labour market is already saturated with opportunities in this area and there is a wealth of evidence of current DIRFT businesses unable to fill vacancies and a consequential impact of the local skills shortage impacting key services such as refuse collection and grounds maintenance job roles in the local economy.
- The scale of this option is inappropriate.
- Will impact on biodiversity and
- Damage the rural setting and distinctive landscape to the north of Crick and the view of and from Crack's Hill.
- Endangering green and active modes of transport and preventing access to green landscapes and Public footpaths EM2, Public Bridleways EM13 and FP3
- Cumulative impact with Houlton SUE has eroded the greenspace between M1 and rugby. Land to east of M1 now acts as a green buffer between the new SUE and DIRFT and Crick and Yelvertoft.
- Greenfield development with an impact on the setting of the villages
- There is no business case for further development post Phase 3, HENA states there is uncertainty about strategic warehouse demand with a requirement for a separate study that needs to consider wider sub-regional issues.
- Lack of benefits to the local communities and environment which, with the vast costs of installing this facility, is a poor return on investment, it will create few jobs with no guarantee that these will employ local people.
- Existing negative impact of noise, air, and light pollution from DIRFT and other peripheral development on Crick.
- Impact on local roads from Junction 18 and A5 traffic
- The current DIRFT development already offers high levels of employment for the population from Northamptonshire, Warwickshire and Leicestershire with vacancies regularly advertised. Employment opportunities are also close by at industrial parks at Magna Park Lutterworth, Daventry and in Rugby.

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- The cost of housing is high and affordable housing in the area is not available on the scale in line with jobs and salaries currently offered at DIRFT therefore people out of area commute to DIRFT increasing traffic congestion on the local roads.
- Impact (including litter) of overnight stays in lay-bys by lorries and on roadsides around the village where drivers do not have facilities to use.
- DIRFT has reached its maximum size, it won't be too long until Crick is connected with Rugby,
- Over dependence on logistics - the nature of DIRFT does not maximise employee ratio to square footage and in the future more and more jobs will become automated especially distribution and warehousing.
- Should be promoting high tech high wage opportunities
- Rural areas and smaller towns should remain rural
- More thought should go into smaller scale light industrial units which provide more employment per square metre.
- Road and improved M1 before development
- DIRFT not operating to full capacity so unclear how this will be sustainable
- All proposals need better understanding of the impact of climate change
- This is an unacceptable extension of the DIRFT facility which will have a highly detrimental impact on the surrounding villages and the rural environment.
- Public transport connections are poor and a substantial proportion of the roles at DIRFT are done by persons who live some distance away and commute.
- This would make the village of Kilsby a southern extension of DIRFT. The area is on a ridge of higher ground which would make it visible from most of Kilsby. There would be very little employment of local people as the housing in the area is too expensive for low-skilled workers, most of whom would be transported in from nearby cities. The number of jobs which would be created is also questionable.
- Labour market is saturated with opportunities in this area – with demand outstripping supply and would require commuting which is not a low carbon option and is incompatible with WN becoming a net zero carbon area.
- Before any further development is planned at Junction 18 of the M1, WNC needs to properly assess the impact of the existing development upon the village of Crick. What its predecessor has created is an unrestricted colossal fridge that operates 24/7 and 365 days of the year. No thought was given to this, i.e., that the warehouses are huge refrigeration units and that refrigerated lorries queue with their loud noise and fumes, especially in the early hours of the morning and late at night. The enormous concentration of bad neighbour uses in one location is always going to create a mammoth environmental health impact and no more should be planned until existing issues have been remedied. In addition, there are no affordable services for lorry and delivery drivers which means they cause congestion in the centre of the village whilst shopping at the co-op and constantly block access.
- Key impacts will be noise and light pollution and an adverse impact on air quality. The proposal will cause irreparable damage to the local environment and communities and take substantial areas out of agricultural use
- As with all development, particularly that located in open countryside there needs to be a conclusion to further expansion and as a whole CPRE

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considers that with the DIRFT site the full potential of further large-scale development has now been reached. Further development will cause significant harm to the countryside

Comments made by respondents who did not specify ‘yes’ or ‘no’:

- These sites are some distance from the canal though visual impacts may need to be considered as part of an LVIA. In addition, consideration of potential impacts to the canal, its users and associated infrastructure from increased vehicular movements would also be required.
- This is now an opportunity to establish a truly sustainable approach which considers the plan area as a whole rather than the former sum of its parts (Northampton, Daventry, and South Northamptonshire). To this end, it is considered that greater consideration should be afforded to neighbouring authority areas, which will influence the spatial pattern of economic development. For example, the needs arising from the Arc in the and high levels of growth in the north, for example Rugby Borough.
- There has already been substantial development which is still ongoing. This will already have substantial but as yet unquantified impact on the locality, in particular Kilsby and Crick, and the impact on the highways (A5 and A428 and Junction 18) by substantial increased traffic from the already approved DIRFT extensions and the emerging new town of Houlton which will access onto the A5.
- This option is shown on the flood map as within flood zone 1. There are ordinary watercourses located on the site which have not been modelled, however this should not prevent the site from being developed.
- Expect that this scale of growth would have a significant impact on the operation of M1 J18. We note that option 3a would require a new bridge crossing over the M1 and Option 3b would be accessed via the A5 and A428.
- Employment sites such as this raise their own issues for the Police and Fire and Rescue Services. In terms of Policing, the existing site has provided funding for training and equipment for 3 PCSO's who serve the development. Additional resources will be required to service the proposed development in the future. We would ask that any policy relating to this site is subject to Secured by Design and other relevant crime prevention measures, to take antisocial behaviour and vehicle crime.
- In terms of the Fire and Rescue Service, if this development is to be predominantly “big sheds”. This causes issues in terms of appropriate vehicles to tackle warehouse fires. For this type of development, hydraulic platforms are required to give the necessary height and reach to tackle this type of fire. The Fire and Rescue Service will be seeking financial contributions to ensure that such equipment is available to serve this and other large scale relevant developments.
- This area will be very difficult to make readily serviceable by sustainable modes of all kinds owing to the severance presented by the M1, and its distance from the main bus corridor on the A428 through junction 18. Concerns that it will induce substantial amounts of traffic at peak/shift change times west of the M1 on the A428, seriously hindering the operation of existing and future anticipated bus services.

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- Warwickshire County Council (WCC) is keen to ensure that the cumulative traffic impacts of Spatial Options 3a and 3b are appropriately assessed in terms of their likely impacts on routes and junctions in Rugby and surrounding area. Comprehensive list of capacity constrained routes includes M6 Junction 1; A5 /A426 Gibbet Hill; A426 Leicester Road corridor; A428 Crick Road/Hillmorton Road/Ashlawn Road corridor; A426/A428/B4642 Rugby Gyration.
- The significant scale of Spatial Option 3a to the east of the M1 is likely to generate additional commuter and HGV trips on already congested routes and at capacity constrained junctions and may require further mitigation over and above scheme interventions which are already planned or committed.
- WCC would therefore seek an opportunity to work jointly with West Northamptonshire Council and National Highways at an appropriately early stage to agree modelling assumptions, methodologies and scope for a Strategic Transport Assessment of Spatial Options 3a and 3b on the routes referred to above to ensure potential cumulative traffic impacts associated with these spatial options are identified and appropriately mitigated where there are likely to be demonstrable impacts on capacity, road safety and/or air quality

Parish / Town Council Responses

The following Parish and Town Councils supported the potential:

- **Blakesley PC** - Yes, given the access to infrastructure, although public transport links need to be in place
- **Blisworth PC** (no comments)
- **Brixworth PC and Strategic Planning Working Group** - Essential that there is a link to access junction 19 of the M1 from and to the A14 south of the M1/M6/A14 interchange, otherwise “satnav” directs trucks through the villages to “cut the corner”.
- **Cogenhoe and Whiston PC** (no comments)
- **Daventry Town Council** - Located to major road network, and rail link, good infrastructure already in place to cope with commercial traffic.
- **Greens Norton PC** - Yes, given the access to infrastructure, although public transport links need to be in place.
- **Long Buckby PC** - More evidence of some serious investigation of the proposed sites. Not just a few bald facts available from the internet. A thriving community should not be allowed to grow beyond the local economy's ability to support otherwise they simply become dormitories. This size limit should be incorporated in the plan. Keeping economic activity & the associated workforce close together promotes both the business development & green objectives of the plan. Assuming the Daventry NE residential development takes place
- **Old PC** - Reasonable strengths to the proposal.
- **Overstone PC** - An employment area so near to strategic transport links, M1, M45, M6, A5 and the A14 is a great location. Coupled with homes built near the A14 and M1 would be ideal.
- **Walgrave PC** - Given the transport links, M1, M45, M6, A5 and the A14 is a great location, this would seem suitable.
- **Weedon PC** – No comments provided

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The following Parish and Town Councils objected to the potential:

- **Crick PC** - The labour market is SATURATED with opportunities in this location. Demand is already massively outstripping Supply. There is a high % of vacancies. There are banners advertising jobs on every fence, signpost, and roundabout. Job Agencies are spamming social media groups based in Crick, Yelvertoft and Lilbourne but are unable to recruit sufficient staff to fill current vacancies. Recruitment standards are being lowered at warehouses in this area in order to try to find more staff. Councils and related support services cannot attract labour for key worker roles such as refuse collection as warehousing/driver rates are more competitive. DIRFT Labour is travelling long distances from outside West Northamptonshire (e.g., Birmingham, West Bromwich!) using non-green methods of transport. The road network is already dangerously congested with HGVs and cars, particularly when shifts changeover. There is noise pollution, light pollution, and litter everywhere. Further intensification of this model is NOT a sustainable, low-carbon option. It is NOT compatible with the transition of West Northamptonshire to a net zero carbon area. It does NOT support the objectives of health and wellbeing, supporting rural communities, thriving villages, rural diversification, landscape or heritage,
- **Kilsby PC** - This would not have the potential to deliver meaningful employment in West Northamptonshire, rather it is more likely to draw on labour from the Rugby area due to the proximity of the development to the boundary with Warwickshire.

The following Town and Parish Councils did not specify ‘yes’ or ‘no’:

- **Little Houghton PC** - LHPC has insufficient local knowledge to comment specifically on identified sites. LHPC finds it difficult to agree with further expansion of the towns into rural areas without understanding the impact on heritage assets, conservation areas and existing infrastructure - in particular the highways network. Building on the flood plain MUST be avoided. The potential for using brown-fill sites and under used town centre buildings for both housing and employment should be urgently assessed, together with an exploration of the identified constraints. Sites already identified within the JCS should be progressed before further land is allocated for development.
- **Kislingbury PC** – Decline to vote on particular options.
- **Wootton PC** – Additional information required

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Question 21: Do you agree that spatial option 3a – Land to the East of DIRFT – has the potential to deliver employment development?

- 256 respondents said “yes”
- 388 respondents said “no”
- 480 respondents provided specific comments

Those who supported spatial option 3a - Land to the East of DIRFT raised the following key points:

- Best option, many advantages over the other options. DIRFT is a well-established logistical centre, provides significant employment, fits the needs, and has infrastructure that could take infill or be expanded.
- Essential that sufficient employment land is provided to allow controlled expansion of high-quality sustainable logistics parks. Minimise impact on villages.
- Great location for business, especially with the Warwickshire council proposal for a railway station near DIRFT.
- Excellent strategic location next to motorway, A5 and existing infrastructure will allow for road-based connectivity.
- Development likely to minimise transport issues on more rural surroundings.
- Area is already compromised by development. It would keep traffic congestion, noise, and pollution away from rural areas.
- Despite excellent location, cost of bridge over M1 will need serious consideration.
- The proximity to Rugby, including the Houlton SUE and Crick provide access to services and facilities.
- Would benefit from having a large pool of potential employees nearby.
- Consider where potential employees will come from. There is an opportunity for rail commuter facility to make it more sustainable.
- Good opportunity for employment growth in an area where there isn't much, very central due to motorway network.
- Concentrate warehousing and industry in the DIRFT area, it is ideally located for rail and motorway. Do not spread it around the rest of West Northamptonshire.
- Should be combined with a housing allocation to enable walking or cycling to employment to create a sustainable community and reduce carbon footprint.
- Need to incorporate sufficient driver facilities.
- Yes, but need to consider impacts on villages, in terms of view, traffic and other environmental considerations.
- In order for country to keep up with changing economy, developments like this are inevitable.
- Allocating land within options 3a and 3b will provide choice within the market, forge new connections and secure/strengthen supply chains by allocating additional land east and west of J18. This would not detract from DIRFT, it could enhance it, particularly where occupiers are attracted to the location because they are supplying at DIRFT based company.

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Those who objected to Land to the East of DIRFT raised the following key points: (These are grouped under headings for ease of reference)

Scale and type of proposed employment

- Option's strengths are weak, weaknesses are substantial, it would be contrary to many of WNC's priorities.
- Cannot see how this is sustainable as DIRFT is not operating at full capacity.
- No business case or need for more development. Development at Houlton and other warehousing is already happening. Should wait until additional study on strategic warehouse demand. It might not even meet all the warehousing needs.
- No guarantee that it will provide jobs for the local workforce. Salaries are not in line with local housing costs so it would not benefit the villages.
- Minimal public transport means that cars are already excessively used.
- Many workers at existing businesses are not local, commuting into the area to work and contributing to road traffic and congestion. This is not environmentally friendly.
- Development will not deliver employment, existing businesses are unable to fill vacancies at existing developments at DIRFT, Magna Park, Daventry, and Rugby.
- Unemployment is low in this area. If jobs are needed, they should be built near where people who want to live.
- Limited number of new high-quality jobs because it is logistics. Will not create meaningful employment opportunities. Need more diverse employment, including skilled manufacturing and high-end technology and sustainable and environmentally sound sectors.
- This part of Northants has taken a large proportion of the warehouses and industrial land over the last 5 years. Area of DIRFT 1-3 at J18 is already overdeveloped. This and Houlton SUE have eroded green space between M1 and Rugby. Land east of M1 acts as a buffer between the SUE/DIRFT and Crick and Yelvertoft. Further development would lead to coalescence with the solar and windfarm.
- Scale is totally inappropriate, it would have a devastating effect on Yelvertoft, Crick and Lilbourne, it would turn it into a vast industrial complex.
- Would result in warehouses all the way from Crick to Hinckley and beyond.
- Need to move away from outdated vision of building warehouses everywhere.
- Provide opportunities for local and agile companies rather than those with financial backing to acquire land.
- DIRFT 1 was well planned to create an acceptable environment. Subsequent phases are disappointing, land is neglected and the multi storey car park unattractive. DIRFT has not been planned well, it does not compare well with the Lutterworth Ullesthorpe development where buildings and roads are acceptable, and a new roundabout is in place.
- 3a far exceeds the HEDNA needs and would require a major new structure across the M1, which would be difficult and costly. It would not have its own rail connection, relying on DIRFT 3 terminal, putting occupiers further away from

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terminal and increasing HGV movements. Risks coalescence with Yelvertoft and would displace the wind farm.

Impact on natural environment and villages

- Would lead to the permanent loss of unique Northamptonshire rural landscape, productive agricultural land, green buffer/Green Belt, green spaces that act as a carbon sink and wildlife habitats.
- Avoid sensitive areas, wildlife areas, important woods, and general landscape.
- Existing non-agricultural uses such as wind turbines, solar farm, trail bikes and gun club are all temporary uses which could be easily returned to agriculture.
- Visual impact, light, noise, and air pollution from existing operations (Rugby Radio site, DIRFT 1, 2, 3 and Crick) and the road network already affects Crick, Lilbourne, Kilsby and Yelvertoft. This would make it worse.
- Litter and lorry parking close to DIRFT/other warehousing is an existing concern.
- Offers no protection, there is nothing green and clean about this option, it will not help climate change. There needs to be substantial tree planting to screen villages.
- It would have a devastating effect on Yelvertoft, Lilbourne, Crick, West Haddon, and Clay Coton in terms of their rural setting, tranquillity, natural environment between villages, quality of life, living standards, property prices and sense of place as communities. Option would turn area into a vast industrial complex around Yelvertoft, Crick and Lilbourne.
- Not in line with Yelvertoft design plan. It would bring additional traffic to the village, be a road safety issue, and increase the likelihood of flooding. It would be right next to housing the edge of the village which already suffers from light, air, and noise pollution.
- Lilbourne is already impacted by rail freight, DIRFT, wind turbines, M1, Catthorpe interchange and housing development. Hedgerow on Lilbourne Meadows was destroyed in nesting season which made most of the reserve unusable. Visual impact of large warehouse is not mitigated by mounding and landscaping, trees will take years to grow. Feels like Lilbourne is neglected, it is no longer peaceful with a lot of noise and light pollution.
- Site straddles bridleway between Crick and Yelvertoft/Yelvertoft and Hillmorton and circular walks around Crick. These are already adversely affected by DIRFT 3 and will be worse with more development.
- Major warehousing would have a detrimental effect on Crick and Yelvertoft from an aesthetic and recreational perspective.
- Loss of distinctive landscape north of Crick, special landscape area, and views from Crack's Hill. Existing warehouses already block these views.
- Contrary to surveys for Crick neighbourhood plan which showed people valued access to the countryside and rural setting.
- Significant proportion of the area has a high chance of surface water flooding. Development would increase flood risk to other areas of the catchment. Residents of Yelvertoft already suffer localised flooding even after the flood alleviation scheme.

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- Site is within flood zone 1. Ordinary watercourses on site have not been modelled but should not prevent site from being developed.
- Negative effects of development would impact on residents' mental and physical health and wellbeing. Prospect of development is already causing worry.
- Likely to have a negative impact on tourism, including the canal network, walking, and cycling.
- General lack of awareness of climate change and carbon challenges. Need for greater sustainability and resilience in options.

Reduced allocation & alternatives

- Use previously developed land first.
- M1 should be the limit to development, do not develop east of the M1 or as far east as shown to reduce impact on Yelvertoft.
- Some scope but only from the M1 as far as the motocross track.
- There are other sites along the M1 and A5 that are nowhere near villages.
- Site clearly has potential to deliver employment development, however, should also allow new commercial developments in the rural parts of former DDC, particularly close to larger settlements with a good level of services and facilities and close links to the strategic transport network such as West Haddon.
- Already an employment area so generally suitable but perhaps on a smaller scale e.g., c. 50ha. However, attention must be given to the local villages who have already experienced increased traffic and noise as well as the construction of large wind turbines in what was once attractive countryside.
- Any consideration of this area should involve the three counties affected and proposals take full consideration of local communities.

Highways and transport

- It will be dangerous for green and active modes of transport (cyclists and walkers) and prevent access to green spaces and public footpaths and bridleways.
- Impact on Crick-Yelvertoft bridleway, both in terms of visual intrusion on enjoyment of this route and possible loss/disruption of the bridleway. Yelvertoft does not have a bus service, and this is the only route for some Yelvertoft residents to access services in Crick.
- HGVs already cause congestion, health, and road safety issues. Putting more diesel HGVs into a confined area will lead to more pollution.
- HGVs have already damaged local village roads.
- Current road infrastructure would not be able to cope. There will be a need for substantial new infrastructure for the influx of vehicles.
- Added pressure on the road network, particularly the A5.
- Yelvertoft, Crick and Lilbourne roads already suffer from high levels of traffic congestion. Roads are minor and not designed for heavy traffic, they will not cope with more traffic.
- Employment opportunities would not be available to local people due to lack of public transport from the villages and no suitable cycleways to the site.

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- Poor bus routes and active travel connectivity although would be possible from Rugby and Houlton. These would have to be improved.
- Safe walking and cycling routes and other non-vehicle transport should be prioritised.

Heritage

- Potential to impact on conservation areas at Lilbourne, Yelvertoft and Crick and scheduled monuments at Lilbourne, plus nationally important ridge and furrow. If taken forward, detailed assessment would be required, particularly referencing the setting of surrounding assets at an early stage to inform allocation.
- Should be strict development boundaries to avoid negative impacts on heritage.
- Would destroy local heritage, archaeology, and culture.

Infrastructure

- Access by sustainable modes of transport would be difficult due to M1 and distance from main bus corridor. Provision of a bus access over the M1 from DIRFT 3 via a new bridge would be very costly but would address this issue.
- Would displace renewable energy projects including the recently installed windfarm and proposed solar farm, contrary to being green and clean.
- No mention of additional services and facilities needed.
- Would need to be accompanied by better truck driver facilities and stopping places as the laybys which are always full.
- Impact on police and fire services based in Daventry, information being sought on their capacity. Existing DIRFT development requires significant support for various types of incidents. Expansion would be expected to provide sponsorship of an additional PCSO and potentially specialist vehicles capable of accessing larger buildings. Adequate safe driver facilities would also be required.

Other

- Complaint about the consultation, timing so close to Christmas, lack of publicity and communication, there should have been a public meeting. Document does not show enough detail on boundaries, buildings, roads, number of employees etc. And is drafted in a way that is not aimed at the general public. Unable to make an informed response.
- Full and open consultation with residents required before any decisions are made on the Strategic Plan.
- A balanced strategy of spatial distribution is needed to ensure appropriate delivery.

Town and Parish Council Responses:

The following Town and Parish Councils supported spatial option 3a:

- **Blisworth Parish Council** (no comments)
- **Brixworth Parish Council** – Essential there is a link to access J19 of the M1 and to the A14.
- **Culworth Parish Council** (no comments)

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- **Daventry Town Council** - Located close to major road network and good rail links. Good infrastructure already in place to cope with commercial traffic.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Long Buckby** – refers to previous responses
- **Nether Heyford Parish Council** (no comments)
- **Syresham Parish Council** - Commend using railways for freight and it is sensible to keep warehousing close to DIRFT. However, there will be further HGV pressure on the M1 and A5. The scale of the proposed development would be unacceptable for the small rural settlements in the area.
- **Old Parish Council** - Reasonable strengths to the proposal.
- **Woodford-cum-Membriis Parish Council** (no comments)

The following Town and Parish Councils objected to spatial option 3a:

- **Crick Parish Council** - Have provided a comprehensive response covering the following issues:
 - Breaching the demarcation provided by The M1.
 - Coalescence with the existing solar farm.
 - Loss of green space and rural character that is identified as important in the Neighbourhood Plan survey.
 - impact on the landscape should be considered but also the loss of valuable agricultural land along with the natural habitat for much wildlife.
 - Inadequate lorry parking at the existing DIRFT site.
 - Vehicles wishing to exit the motorway at J18 on the M1 already are frequently queuing on the carriageway at certain peak times of the day. Further intensification of traffic using this junction will only exacerbate the problem.
 - When there is an incident on the M1, the A5 becomes the diversionary route and consequently experiences significant congestion, which is a safety issue.
 - The proposal to build a bridge over the M1 will also have a further negative impact on the green spaces to the east of the motorway as this will be a driver to allow further industrialisation into the already depleted countryside surrounding these villages.
 - The impact of the significant growth in housing in this area has to be considered, both in terms of the construction traffic and the movements of the residents once the houses are occupied. There will be 6,200 at Houlton, 6,000 at Daventry and a potential 5,000 at Long Buckby. Safety concerns on the A5 are highlighted.
 - Pollution is a further major concern both in terms of air, light, and noise.
 - Crick already struggles to provide parking provision. It is a historic village with narrow roads and on street parking.
 - Even though DIRFT 3 has yet to be completed there is already a significant problem in filling the job vacancies. Banners are hung all around DIRFT advertising job vacancies and there is a plan currently being explored to bring workers in from as far away as Leicester to satisfy the demand.
 - The impact on the villages of Crick, Yelvertoft and Lilbourne will be catastrophic. Already the 200-acre solar farm has been granted approval and any further expansion to the east of the motorway will certainly be contrary to

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the wishes of the villagers according to the evidence gained in the Crick Village Neighbourhood Development plan.

- **Lilbourne Parish Council** - Area is already over-developed and this option would turn it into a vast industrial complex, swamping Yelvertoft, Lilbourne and Crick. M1 is a well-defined boundary between large-scale development to the west and the agricultural landscape to the east. Development beyond this would be an unacceptable extension into the rural landscape, causing significant adverse landscape impact and unacceptable visual intrusion. It would cause an unacceptable detrimental impact on nearby villages. It would be right up to housing on the edge of Yelvertoft and have significant adverse effect on Lilbourne, Crick and Clay Coton. The villages are all already significantly affected by light and noise pollution from DIRFT and the employment areas at Crick where the noise of movement of lorries and other machinery continues 24/7. Site is low lying adjacent to the Clifton Brook but rises up significantly from there. This would lead to buildings climbing up the hillside and becoming an unacceptable feature on the skyline. Development could be partly set into the ground; however, the scale of the buildings and external service areas would lead to major earth shaping. Development contrary to Objective 1: Climate Change. Site is distant from a local labour supply. Would be a significant loss of productive agricultural land, contrary to national concerns about climate change, the need for the country to become more self-sufficient in food production and reduce food miles. Large part of the area is at high risk of surface water flooding. Climate Change brings more frequent extreme weather events; therefore, development cannot be sustainable and would increase flood risks in other parts of the Avon catchment. Part of site is occupied by relatively new wind turbines, which have many productive years remaining. This is contrary to policies and national needs for green energy. Area already suffers from air pollution from the M1, A14 and DIRFT. This would be significantly increased by this proposal particularly for villages downwind/receiving the prevailing wind like Yelvertoft. Development of DIRFT 3 extension has disrupted wildlife habitats. Full extent is unknown despite mitigation measures at Lilbourne Meadows. Option would affect the same species and includes an important nesting area for curlews. Site straddles the bridleway and footpath which links Yelvertoft to Crick, Yelvertoft to Hillmorton which are already adversely affected DIRFT 3 extension. This development would create an unpleasant experience with noise and traffic and would not be a safe place for horses and riders.
- **Yelvertoft Parish Council** – Climate change should be at the top of the agenda. Large scale nature of the proposal is out of character with the rural landscape and will result in loss of habitat, species and flora and fauna, and natural drainage. Extending beyond the current defined boundary would have an unacceptable impact on the landscape and villages including Yelvertoft. Loss of agricultural land will reduce food production. Development would displace wind turbines and reduce renewable energy. Contrary to the climate emergency and national sustainability objectives and policies. Significant proportion of the site is at a high risk of flooding. Further information on flood risk is needed. Bridleway is

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missing from the plan. (There is an error in the SLAA assessment of site 139 which incorrectly refers to a bus service to Towcester)

The following Town and Parish Councils did not specify ‘yes’ or ‘no’:

- **Blakesley Parish Council** – not able to comment
- **Easton Neston Parish Meeting** – not able to comment
- **Hinton-in-the-Hedges Parish Meeting** - Everything has a ‘potential’ – the question is whether it is morally right to do it – do the council taxpayers already there want it?
- **Kilsby Parish Council** - This would not have the potential to deliver meaningful employment in West Northamptonshire, rather it is more likely to draw on labour from the Rugby area due to the proximity of the development to the boundary with Warwickshire.
- **Kislingbury Parish Council** – decline to vote for particular options.
- **Little Houghton Parish Council** – see response to Q8
- **Weedon Parish Council** – see response to Q20
- **Whittlebury Parish Council** – not able to comment
- **Wootton Parish Council** – additional information required

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Question 22: Do you agree that spatial option 3b – land at M1 Junction 18 – has the potential to deliver employment development?

- 261 respondents said “yes”
- 231 respondents said “no”
- 287 respondents provided specific comments

Those who supported spatial option 3b - land at M1 Junction 18 raised the following key points:

- Already an employment hub and would be a sensible extension.
- Essential that sufficient employment land is provided to allow controlled expansion of high-quality sustainable logistics parks. Minimise impact on villages, especially Kilsby.
- It would benefit from having a large pool of potential employees nearby.
- Should be combined with a housing allocation to enable walking or cycling to employment to create a sustainable community and reduce carbon footprint.
- There is an opportunity for rail commuter facility to make it more sustainable.
- Better alternative to J15 and J15A options.
- Better than in villages and on green spaces but scale is mammoth.
- Need to consider impacts on villages.
- As long as the necessary infrastructure is provided.
- Size of development looks sustainable.
- Concentrate warehousing and industry in the DIRFT area, it is ideally located for rail and motorway. Do not spread it around the rest of West Northamptonshire.
- Excellent strategic location with access to major roads (A5, A14, M1, M6) and infrastructure to support it. Creative planning options can address identified weaknesses.
- Eco-park@DaventryInterchange parcel west of A5/bounded by railway lines is the best fit for employment growth. It offers three options for rail freight and has no environmental constraints. It is close to Kilsby but at a lower level and would be screened by topography and existing rail and roads. It is also next to land holding to the south where a country park is proposed and would achieve environmental performance, carbon reductions, promote healthy lifestyles and provide access to green space. It has advantages over the other 3b parcels in terms of scale and delivery and option 3a.
- Impact seems modest compared to recent industrial development.
- Certain parts would be possible, area east of M1 is already used as a depot, therefore partly industrialised.
- Should offer a diversity of employment.
- Public rights of way can be diverted or development sympathetic to their position.
- Full extent of potential site is not shown, site should be extended west of M1 to increase developable area. This site offers chance to provide choice and flexibility in the market, different to DIRFT, to allow B2/B8 operations to move into the area and make connections with DIRFT/supply company based at DIRFT. Extending site to include site east of the M1 will not detract from DIRFT and

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- needs support of the local plan. It would also provide green infrastructure and biodiversity net gain.
- Option does not identify entire land parcel west of J18. The site could be extended to increase developable area and provide green infrastructure and on-site biodiversity net gain. DIRFT is fulfilling its potential as a strategic rail freight terminal of regional/national importance and growth is seen as necessary in the plan period. Allocating land within options 3a and 3b will provide choice within the market, forge new connections and secure/strengthen supply chains by allocating additional land east and west of J18. This would cater for localised West Northants market to expand existing facilities or as a new investment. It would not detract from DIRFT, it could enhance it, particularly where occupiers are attracted to the location because they are supplying at DIRFT based company.

Those who objected to spatial option 3b - land at M1 Junction 18 raised the following key points: (These are grouped under headings for ease of reference)

Scale and type of proposed employment

- Development would not deliver spatial objectives.
- No business case or need for more development. Should wait until additional study on strategic warehouse demand.
- Smaller and more proportionate sites but DIRFT is not operating at capacity.
- Developer driven development, no evidence of genuine and publicly supported evidence of need.
- Development will not deliver employment, existing businesses are unable to fill vacancies at existing developments at DIRFT, Magna Park, Daventry, and Rugby.
- No guarantee that it will provide jobs for the local workforce. Many workers at existing businesses are not local, commuting into the area to work and contributing to road traffic.
- Limited number of high-quality new jobs because it is logistics.
- Unemployment is very low in this area.
- If jobs are needed, they should be built near where people who want to live.
- Salaries are not in line with local housing costs, it would not benefit the villages as people will commute in to work, adding to congestion and not environmentally friendly.
- Council is obsessed with building warehouses everywhere with no consideration of the visual impact. Unimaginative. Give more thought to alternatives, they are not environmentally friendly.
- Existing warehouses are vacant for long period and rail freight is not fully used.
- Scale is totally inappropriate, it would have a devastating effect on Yelvertoft, Lilbourne and Crick.

Impact on natural environment and villages

- Would lead to the permanent loss of unique Northamptonshire rural landscape, productive agricultural land, green buffer/Green Belt, green spaces that act as a carbon sink and wildlife habitats.

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- Development of these sites will make remaining agricultural land prime for development.
- Existing non-agricultural uses such as wind turbines, solar farm, trail bikes and gun club are all temporary uses which could be easily returned to agriculture.
- Covering land in concrete and warehouses will further impact on the environment.
- Offers no protection, there is nothing green and clean about this option, it contradicts objectives 1 and 2. Will not help climate change or save the planet.
- It would have a devastating effect on Yelvertoft, Lilbourne, Crick, West Haddon, and Clay Coton in terms of their rural setting, tranquillity, natural environment between villages, quality of life and sense of place as communities. It would be right next to housing the edge of Yelvertoft.
- Option would turn area into a vast industrial complex around Yelvertoft, Crick and Lilbourne.
- Essential to maintain a buffer between industrial areas and the villages.
- Loss of important buffer area to maintain integrity of Kilsby village. Remove area next to Jubilee Wood from the proposal.
- Negative effects of development would impact on residents' mental and physical health and wellbeing. Prospect of development is already causing worry.
- Area is already over-developed around the motorway junctions, which presents a poor image at the entrance to West Northants.
- Visual impact, light and air pollution and constant noise from operations at existing development (Rugby Radio site, DIRFT 1, 2, 3 and Crick) already affects Crick, Lilbourne, Kilsby and Yelvertoft. This would make it worse.
- Litter and lorry parking close to DIRFT/other warehousing is an existing concern.
- This would be on land at a higher level than existing DIRFT buildings which would have a major adverse impact on visual aspect, character, and amenity of villages.
- Crick was always a great place to live due to countryside, wildlife and beautiful. It has changed over last 20 years because of DIRFT. Contrary to surveys for Crick neighbourhood plan.
- Proposed extension of Crick industrial estate will bring it closer to the village and destroy part of the green buffer between commercial area and historic parts of village. Would also adversely affect the allotments. It is already an unattractive entrance to the village, concerned that extension would be similar due to lack of management company.
- Landscape is under threat of flat blocky warehouses, particularly around the motorway junctions. Loss of distinctive landscape north of Crick, special landscape area, and views from Crack's Hill. Existing warehouses already block these views.
- Land next to J18 east of the M1 is elevated and would have a detrimental impact on historic setting of Crick and its heritage assets, of which St Margaret's Church is grade I listed. Land west of M1 and railway is a better location for this reason.
- DIRFT development has been constant. Assurances given to Kilsby residents that there would be no expansion south of freight line. This would bring

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warehousing development south of the rail freight line closer to Kilsby and would impact on the historic tunnel, a designated heritage asset. It would be visible from Kilsby. Would also impact on the desirability of the village and house prices.

- Questions the SEA scoring matrix, cannot understand how site has good sustainability performance. Will have a severe negative impact on setting of Kilsby and its residents. Kilsby already faces disruption from light and noise pollution and congestion.
- Yelvertoft village offers a small village environment which many people have chosen because of country lanes, wildlife habitats, small school, positive mental health benefits, safe and healthy environment. Already suffer from M1, wind farms, motocross, solar farm and DIRFT. Way of life could be ruined by pollution from lorries and factories, unsafe roads.
- Significant proportion of the area has a high chance of surface water flooding. Development would increase flood already suffer from localised flooding. Land acts as a flood storage in a high-risk flood area. Flood mitigation works would exacerbate problem.
- Two areas adjacent to J18 of the M1 are in flood zone 3, an assessment of the flood risk would be required. Clifton Brook runs through the site west of the M1 which may limit capacity. FRA would be required and if taken forward as an allocation, a level 2 SFRA would potentially be needed.
- General lack of awareness of climate change and carbon challenges. Need for greater sustainability and resilience in options.

Reduced allocation & alternatives

- Use previously developed land first.
- M1 and A5 are logical limits to development, do not develop east of the M1 or west/south of A5. Could support middle site between DIRFT and M1 because it keeps the area concentrated within the current site footprint. Land north of DIRFT has been generally supported by the village, limited impact on surrounding villages. Land on other side of A5 would be suitable for further development with potential for a woodland to separate it from Houlton.
- Not all 3 areas. Area near Kilsby would impact too much on the village and should be discounted, the other two areas would be more suitable and appear to have less impact on residential properties.
- 3 smaller sites are much more sustainable and appropriate for the rural setting of Crick and Kilsby and for the 2 eastern sites, are essentially infill.
- Could develop small areas east and west of M1 but not the larger area between the railway lines.
- Areas closest to J18 would be best. Not the area south of the railway/west of A5.
- Contain between the railway lines to protect villages.
- Do not support building towards Kilsby and beyond the Northampton loop railway line. Small site closest to Kilsby will not offer much benefit to the whole.
- Site south of Eldon Way should be added to candidate sites under option 3b.
- If the area next to the weighbridge was developed it would open up the area to the north.

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- Should be looking at a wider geographical area to neighbouring council areas including the Arc and Rugby Borough.
- Should be greater acknowledgement of the contribution made by smaller employment sites.

Highways and transport

- Access by sustainable modes of transport would be difficult due to M1 and distance from main bus corridor. Provision of a bus access over the M1 from DIRFT 3 via a new bridge would be very costly but would address this issue.
- It will endanger green and active modes of transport (cyclists and walkers) and prevent access to green spaces and public footpaths and bridleways. Mitigation is required to ensure the public rights of way network is maintained.
- Suggestion for a commuter rail link between Rugby and Northampton at shift change times to supplement the existing limited bus service.
- HGVs already cause congestion, health, and road safety issues. Putting more diesel HGVs into a confined area will lead to more pollution. HGVs have already damaged local village roads.
- Unsure how transport infrastructure will cope with additional development.
- M1 is congested and blocked regularly.
- Added pressure on the road network, particularly the A5 and A361 from Kilsby to Daventry. Substantial new infrastructure will be needed for the influx of vehicles.
- Yelvertoft, Crick and Lilbourne roads already suffer from high levels of traffic congestion. Roads are minor and not designed for heavy traffic, they will not cope with more traffic. It is an area where major roads converge, which creates stress on the minor roads.

Heritage

- Impact on heritage. Part of site is adjacent to Watling Street Roman Road scheduled monument on which there would be a significant impact. High potential for roadside archaeological remains and further south. Impacts on grade II* listed buildings and structures at and outside Kilsby. If taken forward, further detailed assessment would be required including views from Barby motte castle.
- Land next to J18/east of M1/opposite Crick industrial estate is elevated. Potential to impact on historic setting of Crick and listed buildings.
- Land next to J18/east of M1/opposite Crick industrial estate is elevated. Potential to impact on historic setting of Crick and listed buildings.

Infrastructure

- Inadequate truck driver facilities lead to use of verges and laybys for overnight parking, causing significant litter issues and fouling.
- Impact on police and fire services based in Daventry, information being sought on their capacity. Existing DIRFT development requires significant support for various types of incidents. Expansion would be expected to provide sponsorship of an additional PCSO and potentially specialist vehicles capable of accessing larger buildings. Adequate safe driver facilities would also be required.

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- Villages cannot cope with more people, doctors and schools are at maximum capacity.
- Would displace renewable energy projects including the recently installed windfarm and proposed solar farm, contrary to being green and clean.
- No mention of additional services and facilities needed.

Other

- Disappointed at lack of communication from WNC. There should have been a public meeting. Closing date and time were difficult to achieve and unhelpful.
- Maps and information are not sufficiently detailed to make an informed response.

Parish / Town Council Responses:

The following Parish and Town Councils supported spatial option 3b:

- **Blisworth Parish Council** (no comments)
- **Brixworth Parish Council** - Essential that there is a link to access junction 19 of M1 from and to the A14 south of M1/M6/A14 interchange, otherwise satnav directs trucks through villages.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Daventry Town Council** - Appears to be infilling existing employment development. Disagree that the labour market is close by. Current employment is mainly warehousing and demographic for this type of work is based in the larger towns (Coventry/Northampton)
- **Nether Heyford Parish Council** (no comments)
- **Overstone Parish Council** - Great location close to strategic links. Would be ideal if combined with housing close to A14/M1.
- **Long Buckby Parish Council** – refers to previous responses
- **Syresham Parish Council** - Commend use of railways for freight and it is sensible to keep warehousing close to DIRFT. However, there will be further HGV pressure on the M1 and A5 and the scale would be unacceptable for the small rural settlements in the area.
- **Walgrave Parish Council** - Given transport links it is a great location and suitable.
- **Woodford-cum-Membris Parish Council** (no comments)

The following Parish and Town Councils objected to spatial option 3b:

- **Crick Parish Council** - Option will not deliver more employment, labour market is already saturated with similar opportunities. Current DIRFT businesses are unable to fill vacancies. Consequential impact of local skills shortages is impact on key services like refuse collection and grounds maintenance jobs in the local economy. Location is wholly inappropriate. It will endanger life because it is on the floodplain. It will destroy biodiversity, decimate the rural setting and distinctive landscape north of Crick and views of and to Crack's Hill. It will affect health due to pollution, endanger green and active modes of transport by creating

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congestion and RTAs at the M1/A5 interchange. It will prevent access to green landscapes and public footpaths. No enhancement, no protection, no diversification, and nothing green and clean. Thousands of residents will suffer badly.

- **Kilsby Parish Council** - Option is three separate options, each with merits and disadvantages. It is therefore difficult to provide a response that does justice to all three. Would not have the potential to deliver meaningful employment in West Northants, more likely to draw labour from Rugby due to proximity to Warwickshire boundary. Impact on Kilsby Conservation Area and certain listed buildings would be significant and beyond mitigation. Local highway infrastructure is already insufficient. Existing DIRFT expansion plans exceed capacity. Further expansion would add more traffic and make traffic through Kilsby intolerable. Noise, air, and light pollution would seriously impact Kilsby residents. Land is included in the Kilsby NDP as an important buffer between the village and DIRFT. Option would remove that buffer. Public right of way runs through the site. Detrimental impact on wildlife.
- **Old Parish Council** - Weaknesses outweigh strengths.

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Blakesley Parish Council** – not able to comment.
- **Easton Neston Parish Meeting** – not able to comment.
- **Hinton-in-the-Hedges Parish Meeting** - Everything has potential, question is whether it is morally right to do it, do the council taxpayers already there want it?
- **Little Houghton Parish Council** - Insufficient local knowledge to comment on specific sites, however, it is difficult to agree to towns expanding into rural areas without understanding impact on heritage and infrastructure, particularly highways. Potential for using brownfield sites and underused town centre buildings should be addressed as well as the identified constraints. Progress existing JCS sites before allocating more land.
- **Kislingbury Parish Council** – declines to vote for particular options.
- **Weedon Parish Council** – see response to Q20
- **Whittlebury Parish Council** – not able to comment
- **Wootton Parish Council** – additional information required.

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Question 23: Do you agree that there is potential for directing further development at Brackley and Towcester, as rural service centres, as part of the spatial strategy for West Northamptonshire?

- 233 respondents said 'Yes'
- 253 respondents said 'No'
- 315 respondents provided specific comments

Those who supported the potential for directing further development at Brackley and Towcester, as rural service centres, raised the following key points: (These are grouped under headings for ease of reference)

General

- The principle is acceptable provided the history of the towns is preserved.
- A limited amount of residential development would be appropriate in both Brackley and Towcester, provided the growth is appropriate in scale and does not result in overdevelopment.
- Mixed employment and residential uses would create sustainable communities.
- Lovely market towns with good economies and facilities that could be developed in line with their current character.
- There is no evidence to suggest that Brackley or Towcester would be unable to accommodate some future growth in the next 30-year time period; however, there is equally no evidence to suggest that it could viably be delivered in the context of its strategic infrastructure needs.
- It would be leveraging already successful towns so that the benefit could be felt more readily and more significantly.
- Based on the desire to build commuting settlements for the Oxford - Cambridge Arc, then these towns work quite well. The problem is with the assumption the Arc will benefit Northamptonshire.
- Any proposals would need to be sustainable.
- It is essential that suitable levels of growth are directed towards Brackley and Towcester, to ensure these key settlements can continue to grow up to 2050. These settlements are the third and fourth most sustainable settlements in West Northamptonshire and it is essential that the growth to these settlements is not unnecessarily curtailed and can contribute towards meeting overarching strategic development needs. There remains significant outstanding housing and employment commitments from both the Core Strategy and South Northamptonshire Part 2 Local Plan. However, it must be remembered that these commitments will not continue to deliver to 2050, with both having a functional plan period up to 2029, some 21 years shorter than that now being proposed. As such it is entirely sensible and commensurate for additional allocations to be delivered, to cover the 2029-2050 period.
- The towns are well connected to urban centres of Banbury, Bicester, Oxford, and Milton Keynes and have great residential demand.
- Growth at the Market Towns of Brackley and Towcester is considered to be an appropriate spatial development strategy to help deliver the Spatial Vision.

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- Growth in these towns would result in improved access to services for those living in the smaller surrounding villages, including Silverstone.
- Care and thought needs to be given to the fact that the town centres will be remote from the extensions and how links can be created to capitalise and leverage growth.
- Any growth would need to appreciate the needs of an ageing (and increasingly isolated) population.
- These proposals would have a significant impact on police and fire operations and would be served by Brackley and Towcester fire stations and Brackley and Campbell Square police stations. It should be noted that Towcester is served by a community policing team and a retained fire service only and any major incident would require attendance by the relevant service based in Northampton. Information is currently being sought on the capacity within these facilities, but it is expected that additional cover and investment will be required to meet the needs of these developments.
- There's a drugs problem in both towns that really needs to be dealt with, but I don't think this is the place to raise this.
- 'Rural Service Centres' is not defined in the Spatial Options Consultation.

Highway issues/capacity

- Growth should be accompanied by the necessary highway infrastructure, including sustainable transport options, which should be in place prior to development.
- Brackley is more suited to development than Towcester because of its road networks.
- Proper road links reduce pollution (Speed changes of vehicles is energy intensive).
- With the exception of the established Brackley to Banbury service 500 operated by Stagecoach West, neither town can support a strong commercial bus service at this time. The main link between Towcester and Northampton has in the past been weakly commercial on an hourly basis, but the links to Milton Keynes and between Brackley and Towcester to date have failed to establish sufficient patronage to be sustainable. In part this reflects service design that was driven mainly by the needs of pensioners, demand from which has been declining steadily even before the impact of COVID.
- Stagecoach continues to look seriously at a radical new service offer in the wider A43 corridor that would aim to provide relevant choices to much larger numbers of people in this geography who are making rather longer journeys than the previous and current services have ever provided an option for. Maintaining a strong eye on this major strategic opportunity should be a key concern of the plan, as it would be likely to create near-term scope to substantially decarbonise what is currently one of the most car-dependent and carbon intensive patterns of movement in England.

Infrastructure

- Any development needs to be accompanied by associated infrastructure such as doctors' surgeries, medical facilities, schools, community centres, sports

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facilities etc This infrastructure would need to be carefully planned simultaneously rather than as an afterthought.

Towcester (Specific)

- It is noted that the proposed development location affects a Grade I listed building and Grade II* park and garden, both of which are significant and material, and the planning authority needs to be mindful of the high bar set by the NPPF where heritage assets of this magnitude are impacted by development and this needs to be properly considered in the context of both the NPPF (section 16) and the Planning (Listed Buildings and Conservation Areas) Act 1990.
- If the town is to flourish, then parking and traffic flow have to be properly thought out.
- A good transport assessment would be required to ensure Towcester is not impacted negatively by traffic.
- There are significant benefits both locally to Towcester but also to West Northamptonshire as a whole to recognise, allocate and support strategic employment growth to the north / north west of Towcester, as a key facet of the emerging Plan's spatial strategy and wider regional aims being delivered through the Oxford Cambridge Arc.
- However, there is an urgent need to build the Towcester relief road as there is congestion in Towcester, particularly when vehicles are being diverted off the M1 along the A43.
- The potential for directing further development to Towcester as part of the spatial strategy may be constrained by highway capacity unless Milton Keynes North West (Site ID: 47 to the north of the A5) is allocated, as this development provides the ability to deliver Park and Ride/Mass Rapid Transit, and physical improvements to the A5/A508 junction to address the existing highway constraint.
- Towcester is a local market and rural trading centre that could do with some further development within the town to benefit it, but existing properties not open green spaces bordering the town should be used.
- Further growth at Towcester provides a logical extension that reinforces the current spatial strategy.
- The proposed growth area would deliver junction improvements at the A43/A413 to unlock transport capacity at the town, including at the new A43/southern link road junction, which would otherwise be at capacity when the committed development is completed.
- The ambition is to deliver a sequence of new '15-minute walkable neighbourhoods' with local services and a strong character and identity set within a high-quality green network to deliver a vibrant place to live, work and visit. The proposals are designed as a series of distinct 'villages' to enable the delivery of early phases ensuring that development in this location will make a positive contribution to the Council's housing needs in the short term, as well as the medium to long term.
- The proposals are of a scale to ensure that infrastructure is funded and delivered in tandem with the housing.

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- The woodlands, copse, and vast majority of the hedgerows and trees on the site, as well as the watercourse and ditches, will be retained within the development, and can be connected by creating a network of green corridors along them.
- Effectively serving the currently proposed 3,000-unit Towcester Southern Extension with bus services has, to date, proven to be impossible, and it may not benefit from any credibly relevant bus service for a considerable time to come. This ought to be a significant concern to all stakeholders.
- It is hard to see how further development can be accommodated on the former Racecourse in a way that makes it possible to provide a relevant public transport choice.
- Towcester has experienced proportionate and appropriate growth over the past 20 years demonstrating that this market town is capable of supporting future growth within the South Northamptonshire area.

Brackley (Specific)

- Brackley has a satisfactory by-pass and is close to the M40.
- Brackley offers a sustainable location for increased housing growth.
- There are more suitable locations for allocation than the land to the North-West of Brackley identified under Spatial Option 4a.
- The areas in West Northamptonshire already suffering most from housing affordability are to the south and west around Brackley. That problem will therefore become worse and could potentially become a barrier to economic ambitions if not addressed through increased housing supply.
- There is a very strong likelihood that by 2027/2028 there will be no significant housing land available in Brackley to meet its future needs. Given the economic significance of Brackley and affordability issues in the area, no growth at Brackley cannot be an appropriate strategy for the Plan.
- The provision of enhanced sports facilities in Brackley is welcome and would allow WNC to capitalise on its property portfolio.
- Such growth can and should be brought forward in accordance with the successful urban design principle at Radstone Fields.
- Providing relevant bus service options to recent and more established suburban development at Brackley has proven to be quite challenging.

Those who objected to the potential for directing further development at Brackley and Towcester, as rural service centres, raised the following key points: (These are grouped under headings for ease of reference)

General

- South Northamptonshire Council previously placed over-reliance upon these settlements to deliver the required growth for the area without sufficient infrastructure investment / upgrade. These settlements are not therefore suitable for further significant growth.
- The remaining land on their boundaries is increasingly constrained and of higher environmental quality. Land release should therefore be considered in

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other towns before these Brackley and Towcester to provide for a more evenly distributed growth strategy.

- South Northamptonshire has a high degree of out-commuting, identified in both the West Northamptonshire Joint Core Strategy (Part 1), para 5.59, and in the South Northamptonshire Local Plan (part 2), para 5.1.1, which also highlights the area's low job density. Building significant additional numbers of houses in dormitory towns will exacerbate this existing issue - As we look to create a more sustainable future, we must prioritise putting new housing close to where the jobs are, or are going to be created, so that sustainable travel to work is feasible.
- The strategy should not create dormitory (housing) communities for more distant employment opportunities that do not exist locally.
- The quality of life of current residents should be considered.
- The impact of development would not be capable of sufficient mitigation to outweigh the level of harm that would arise.
- Brackley and Towcester are not ideal development areas. Areas near the M1 should be considered before Brackley and Towcester.
- There are already huge housing estates in both towns which dominate the local rural communities and spoil the nature of rural life.
- More detailed and accurate information is required before you can put forward any plan.
- Neither Towcester nor Brackley are topographically suited to vast expansion.
- More thought needs to go into brownfield sites in Northampton and other town centres negating the need for the urban sprawl that the spatial strategy envisages.
- Brackley and Towcester are the nearest things Northamptonshire still has to attractive market towns. Please don't ruin them too.
- The proposed development is of disproportionate scale to the surrounding West Northamptonshire settlements.
- Existing developments need to be completed first with a subsequent period of stabilisation, before further growth is proposed, or they will become dysfunctional and incur disproportional social costs.
- The proposed development areas are too far from their respective town centres.
- Further development of these towns will not only destroy their characters but also the surrounding rural landscapes and wildlife.
- Any further development must show carbon neutrality by recycling existing assets.
- Developer-driven development has no place in strategic planning. Where is the genuine and publicly supported evidence of need?
- Towns have to grow and develop but in a sympathetic and sustainable manner.
- The proposals lack an understanding of what you are trying to achieve in each development. There is a danger that it is once again developer driven expansion of housing without a sense of what you want each town to be, how you will invest in the town centres and options to think creatively about building community in existing built areas and redevelopment.

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- Brackley and Towcester must be considered separately.
- ‘Rural Service Centres’ is not defined in the Spatial Options Consultation.

Highway issues/capacity

- If growth were to go ahead without the correct highways infrastructure in place the roads will be constantly grid locked – road infrastructure must be in place, prior to any construction.
- The roundabout at Old Stratford is already congested at peak times, and often at non-peak times.
- The road congestion and environmental impact of queuing cars is unacceptable already.
- Without an integrated public transport system that links these towns with the major larger towns such as Northampton, Daventry, Milton Keynes, Banbury and Bicester and their local villages, further growth will just exacerbate reliance on private cars.
- As public transport is pretty much non-existent in the area, any future developments will put even more strain on the overloaded local road system.
- Traffic issues are compounded by the lack of a North bound exit and Southbound entry to the A43 at Shacks Barn.

Infrastructure

- The scale of the proposed development here would be a disaster without infrastructure planning. Any residential development needs to be accompanied by associated infrastructure such as doctors' surgeries, medical facilities, police, fire services, schools, community centres, sports facilities etc
- These towns are already over developed for the infrastructure that supports them.
- Broadband infrastructure must be addressed before any more development is allowed.

Towcester (Specific)

- Towcester should not be further extended to become 3 times bigger than its original size – the approved extension already doubles its size. Now you are planning to add more. Towcester has had enough construction and can take no more without severely damaging the look and feel of a rural town.
- You are making Towcester a polluted large town/small city and destroying the wildlife.
- Traffic through Towcester is a significant issue and will only get worse with further houses being added.
- Towcester is in effect a dormitory town for Milton Keynes and traffic is already a significant problem. It has a poor location and is badly served for access from the south as well as being distant from both the M1 and M40.
- The so-called relief road is already not going to be fit for purpose as it is simply an access road and further development to the southwest of it will no doubt require another road.
- The proposed area is within the Yardley Whittlewood Ridge.

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- The building of houses so close to the Grade II area to the south of the racecourse appears to be on or close to the flood plan of the Tove. Properties and farms to the south will be flooded again.
- This is totally at odds with the green aims set out by WNC.
- The road infrastructure system around Towcester is already under extreme pressure and further housing or industrial development will only exacerbate matters.
- Towcester is a local historic market town and rural trading centre. There's potential for further development within the town envelope but not to the detriment of the green spaces bordering the town. Any development should therefore demonstrate carbon neutrality by making use of brown field sites.
- If the racecourse is developed it needs to be for something other than housing to continue to provide the town with a unique identity.
- Towcester has already increased in size without having a proper bypass delivered as they originally promised. The locals have been fobbed off with promises that never materialise, and someone is making a lot on backhanders on these projects that the locals do not want.
- The full implications of the ongoing development at Towcester South (SUE) and the ability (or otherwise) of the town and its associated physical and social infrastructure to satisfactorily absorb such a massive increase in the size of the town, remains unclear given that the SUE is still in the early stages of implementation and will take several years to be completed. It would be both premature and wrong to consider allowing any further significant growth on greenfield land on the edge of the town during the proposed plan period.
- It needs to be recognised that not all towns have the potential for significant ongoing expansion, and that some reach a point where they become incapable of accommodating anything other than limited incremental growth. Towcester falls into this category by reason of its geography, historical development pattern, landscape setting, the level and accessibility of necessary supporting infrastructure as well as sustainability reasons.
- I am truly horrified at the level of development you are proposing to our unique and beautiful town and surrounding villages. I appreciate growth needs to happen, but your plan (combined with other plans recently submitted e.g., HUGE DHL warehouse, emergency services hub and new retail park) all start to turn Towcester into a completely different place to live. It will then start to attract different demographics and lifestyles - heartbroken.
- There is further potential development for Towcester, but that this must be within the existing town and not be to the detriment of the green spaces around the edge of the town.
- It is essential that the Towcester Relief Road is not only completed quickly but that a weight limit is imposed on the A5 through Towcester to exclude HGVs from the town.
- The police station isn't utilised fully - rehouse the police and court and redeploy that building to save using up more green space.

Brackley (Specific)

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- Brackley does not have the services and infrastructure to support the extensive development that is proposed for the north-west side of the town.
- Halse Road is narrow and already used by a large number of vehicles to access Halse, Humphries Drive and Poppyfields estate. Furthermore, the single path is dangerous for pedestrians as they barely have room to walk safely whilst large vehicles are passing close by.
- Brackley has two natural road barriers, the A43 and the A422 to Farthinghoe. Developing land in fields on the other side of these natural barriers will bring into question vehicle access, road congestion/accidents and the impact on the environment. There will be an adverse effect on public safety with pedestrians trying to cross busy roads. To reduce the risks, significant speed restrictions would be required on the main roads with the addition of other traffic calming measures. Perhaps weight restrictions on the A43 to keep large lorries away from the area.

Comments made by respondents who did not specify ‘yes’ or ‘no’:

- Market towns need to be supported with sympathetic local centres. It is recognised that both towns have already absorbed as much housing as the current infrastructure can bear, so any plan must address not just mitigation for the increase in population but also provide an advantage to the existing community.
- We should create opportunities for our smaller rural centres to grow within reason and providing vibrant hubs that reduce the need to travel; however, if this option is to be considered then we need to develop a strategic plan that considers local transport, mixed housing, and environmental protection for green spaces.
- With the right developments and improvements to infrastructure, prior to commencement, there could be the potential to expand both towns.
- ‘Rural Service Centres’ is not defined in the Spatial Options Consultation.
- Towcester has a high degree of out-commuting which also highlights the area’s low job density. Building a significant number of additional houses in or close to Towcester will only exacerbate this issue. As we look to create a more sustainable future, we will need to prioritise planning for houses closer to where jobs are, and thus reduce commuting. Despite the move to homeworking since the pandemic, commuting continues to create congestion, pollution, and delays on local roads, including the A43 and A5.
- Towcester has accommodated quite a considerable amount of growth through the Core Strategy to date. The allocation of smaller sites in the area are more likely to be supported.
- Towcester is an historic market town that requires sensitive treatment. Uniquely it contains the Easton Neston estate, Grade I and II listed buildings and historic parkland which should not be engulfed by further housing and commercial development. There is potential for tourism, but this should be provided for by further green spaces for recreational use, including substantially more tree planting. Trees have been cut down in the town to make way for newbuild. This is wrong.

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- The plans for further development are utterly daunting for local residents who witness the daily impact of more housing with little supporting infrastructure put in place or properly thought out beforehand.
- Brackley's close links with Buckingham and Bicester need to be recognised in this strategy.
- Oxfordshire County Council note that this is still an early stage of plan preparation and as such the options are presented in the paper as potential spatial options, and not a preferred spatial strategy. Oxfordshire and West Northamptonshire's shared boundary means there is a key interrelationship between Brackley, Banbury, Bicester and onto Oxford. As such we are particularly interested in Spatial Option 4 – Growth at the Market Towns of Brackley and Towcester.

Parish / Town Council Responses

The following Parish and Town Councils supported the potential for directing further development at Brackley and Towcester:

- **A5 Alliance of Parish Councils** - Developing both market towns as rural service centres is a laudable objective. Both have seen significant growth in population in recent years but at their core the services offered are limited and reducing. Increasing the residential capacity around the towns (urban fringe) will not necessarily improve the viability of the centre without clear planning vision. Further improvements in their infrastructure and sustainable transport are required if they are not to become dormitory settlements without a core. The lack of detail and vision is worrying because the potential developments listed (particularly Option 4b) do not appear to offer any of the required benefits and would appear to make traffic congestion worse.
- **Blakesley Parish Council** - With the right improvements to the infrastructure there is potential to further expand Towcester and Brackley. What needs to be learned from the existing experiences is that the roads need to be built before any new housing and therefore not allow a significant development to add pressure for years before.
- **Blisworth Parish Council** (no comments)
- **Brackley Town Council** - Comments provided from Brackley Town Council refer to Brackley only - the Council is not commenting on the suitability of the proposals for Towcester. Although we agree that the options are most suitable in terms of the local area and geography, we would like to reiterate our objection to the further growth of Brackley at this time due to risk of the town being overwhelmed given the recent and already approved/planned rapid growth. Request that a scaled-back 15-year strategic plan is provided instead of a 30-year plan so that development over the medium term can be evaluated.
- **Brixworth Parish Council (inc. Brixworth Strategic Planning Working Group)** - Market towns need to be supported with sympathetic local centres. It is recognised that both towns have already absorbed as much housing as the current infrastructure can bear, so any technical plan must address not just

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mitigation for the increase in population but also provide advantages to the existing community.

- **Bugbrooke Parish Council** - Towcester has the potential to be a thriving small town in South Northants with great independent shops. The weakness is transport links, including no bus service from surrounding villages such as Bugbrooke.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Cosgrove Parish Council** - Lessons must be learnt from existing experiences - roads need to be built before any new housing is developed.
- **Culworth Parish Council** (no comments)
- **Evenley Parish Council** - The Plan flags the need for further work on constraints and infrastructure requirements. We would add the need for long-term work on community development and integrating existing communities in both towns with communities in new areas of housing.
- **Greens Norton Parish Council** - With the right improvements to the infrastructure there is potential to further expand Towcester and Brackley. What needs to be learned from the existing experiences is that the roads need to be built before any new housing and not allow a significant development to add pressure for years before.
- **Kingsthorpe Parish Council** - These are desirable areas, but insufficient knowledge to comment further.
- **Long Buckby Parish Council** - Supports the proposal, which increases the size of an already substantial conurbation with established facilities and takes advantage of excellent communications.
- **Syresham Parish Council** - While there is potential for further development, growth must be restricted to protect surrounding valued agricultural land and the character of the market towns.
- **Nether Heyford Parish Council** (no comments)
- **Old Parish Council** - Growth currently ongoing anyway.
- **Old Stratford Parish Council** - Whatever improvements are required to facilitate such developments, lessons must be learnt from existing experiences - do not allow significant housing to be developed before road infrastructure.
- **Potterspury Parish Council** - Developing both market towns (Brackley and Towcester) as rural service centres is a laudable objective. Both have seen significant growth in recent years, but at their core the services offered are limited and reducing. Increasing the residential capacity around the towns' urban fringe will not necessarily improve the viabilities of the centres without a clear planning vision - Further improvements in infrastructure and sustainable transport are required if they are not to become dormitory settlements without a core. The lack of detail and vision is worrying because the potential developments listed (particularly Option 4b) do not appear to offer any of the required benefits and would appear to make traffic congestion worse.
- **Wappenham Parish Council** - Limited development in this area could be appropriate as they have both already seen huge increases in housing

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recently. Need improved road access – The A43 and A5 and needs careful consideration before further expansion.

- **Weedon Parish Council** - Yes, if done sensitively as the current new development around Towcester seems to have been. There have been welcome improvements to the town centre, including parking, making it a pleasant place to visit (in stark contrast to Daventry).
- **Whittlebury Parish Council** - Yes - there is potential for some further expansion, but this would require appropriate investment in the transport infrastructure. Around Towcester the major local roads including the A5 and A43 are already inadequate with severe congestion at peak times. The half-built Towcester Relief Road is poorly designed, and we are facing an increase in traffic with the in-progress Towcester South SUE and proposals for multiple warehouse developments in the area. Public transport has been cut back in recent years, resulting in more reliance on individual car journeys.
- **Woodford-cum-Membris Parish Council** (no comments)

The following Parish and Town Councils objected to the potential for directing further development at Brackley and Towcester:

- **Daventry Town Council** - Towcester and Brackley are not well-connected to major road or rail networks. Although the road networks to the major roads is good, this is not discouraging traffic movements and reductions in carbon emissions.
- **Easton Neston Parish Meeting** - Towcester is a local market town and rural trading centre. There could be further development within the town envelope but not to the detriment of the green spaces bordering the town. These were identified in 2011 Towcester Masterplan and again in 2020 Local Plan. They need to be preserved and possibly enhanced. Any development should demonstrate carbon neutrality by making use of brownfield sites. We cannot comment on Brackley.
- **Hinton-in-the Hedges Parish Meeting** - Both towns have already exceeded their sustainability levels and there are more dwellings than their infrastructures can deal with. There is not a thought in the current proposals about green issues – not a single solar panel or electric charging point as a requirement of build. Totally overwhelmed existing medical, school and parking facilities. Whilst this section seems sympathetic to these issues, it doesn't seem to stop a suggestion that a further 3,000 houses could be built in Brackley.
- **Silverstone Parish Council** - Brackley and Towcester must be treated separately. Both are in the process of large-scale expansion with a total of about 4,400 homes under construction. There must be sufficient time for these developments and their residents to become integrated into the communities. The relationship with employment is an essential factor in deciding house numbers and the current focus on warehousing in the Towcester area means lower employment than for other types of employment development. An essential prerequisite is that the Towcester Relief Road is

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not only completed quickly but that a weight limit is imposed on the A5 through Towcester to exclude HGVs from the town.

- **Tiffield Parish Council** – Agree that there is potential, but this must be within the town and not on green spaces. Further development should recycle existing assets.
- **Wicken Parish Council** - WNC should not be creating dormitory communities for more distant employment locations because local ones do not exist.

The following Parish and Town Councils did not specify 'yes' or 'no'

- **Cold Higham Parish Council** - Cannot answer definitively either way, but Towcester is already a nightmare for traffic at times, and something would need to be done to alleviate this in advance of any further development.
- **Deanshanger Parish Council** - With the right infrastructure there is the potential to further expand Brackley and Towcester. Roads and other infrastructure need to be in place before development.
- **Kislingbury Parish Council** - Declines to 'vote' for particular options.
- **Little Houghton Parish Council** - LHPC finds it difficult to agree with further expansion of the towns into rural areas without understanding the impact on heritage assets, conservation areas and existing infrastructure - in particular the highways network. Building on the flood plain MUST be avoided. The potential for using brownfield sites and underused town centre buildings for both housing and employment should be urgently assessed, together with an exploration of the identified constraints. Sites already identified within the JCS should be progressed before further land is allocated for development.
- **Wootton Parish Council** - Additional information required.
- **Yardley Gobion Parish Council** - With the right improvements to the infrastructure there is potential to further expand Towcester and Brackley; however, the roads need to be built before any new housing.

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Question 24: Do you agree that spatial option 4a – Brackley North West Expansion – has the potential to deliver residential development?

- 210 respondents said 'Yes'
- 186 respondents said 'No'
- 212 respondents provided specific comments

Those respondents who supported spatial option 4a - Brackley North West Expansion raised the following key points:

- Brackley is located on the A43 with good links to the M40, Banbury, Oxford, and Northampton.
- Infrastructure is already in place to support development.
- Based on the desire to build commuting settlements for the Oxford - Cambridge Arc, then development at Brackley works quite well. My problem is with the assumption the Arc will benefit Northamptonshire.
- Several respondents considered that the option has potential for development, but the option would be overdevelopment and it would cause local services to struggle.
- At a reduced scale possibly. The impact of such a development proportionally to Brackley might be too much unless scaled down.
- Several respondents identified a need for employment development, local jobs, and infrastructure to support housing growth.
- Several respondents considered that the option could deliver growth but only if appropriate highway and other infrastructure is in place before development.
- Brackley has absorbed already as much housing as the current infrastructure can bear, so any technical plan must address not just mitigation for the increase in population but also provide an advantage to the existing community.
- Social family houses 3 and 4 bed are required.
- It would be leveraging an already successful town so that the benefit could be felt more readily and more significantly.
- It only serves to emphasise the inappropriateness of proposals for Spatial Option 5a.
- It is obvious that wherever there is development there will need to be educational, health, road and infrastructure developments and it seems odd to offer these here as weaknesses, as is remoteness from the centre. Daventry is a Town and therefore has a high % of the population and therefore should have development in proportion to that.
- Yes, but the SHLAA had other sites being promoted. A proper set of links to this to existing communities would be required. Such a level of development could bring the sports village, but there would be a need to ensure that there is a ring road round the town.
- Future development must be close to railways.
- The town requires improved infrastructure to accommodate growth such as a local bus service, perhaps ring and ride service to give residents at the far edges of development the opportunity not to drive their cars. More houses mean more people means more crime - Brackley needs a police Station.

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- Long-term investment in community development, plus a clear statement that Brackley would be bounded by A43 and A422, and that these would not be crossed by development in future, in order to contain the spread of the town.
- As long as any proposed development is sympathetic to the town and not just another site of soul less boxes that developers seem to favour these days.
- This may be small scale village expansion as required. I am unsure of any larger scale development potential. I would think that the transport links would also preclude this.
- Radstone Fields was originally built as a result of a large brownfield becoming available. To extend this would be a natural progression and serves to ‘wrap around’ the town of Brackley. Transport links would already be in existence and so again there is the opportunity here to use green strategies to avoid excess car use.
- The area continuing to the proposed HS2 could be developed, but Brackley has already increased tenfold in last ten years and is there enough infrastructure / schools etc. to cope.
- These proposals would have a significant impact on police and fire operations and would be served by Brackley and Towcester fire stations and Brackley and Campbell Square police stations. It is expected that additional cover and investment will be required to meet the needs of these developments.
- Developing existing urban and town areas, with their existing infrastructure, seems to be most compatible with the objectives, as it minimises carbon impact and retains the overall character of the region (as opposed to new sites and village expansion)
- Any of the developments consulted on need to be able to demonstrate what benefits will accrue to the area in terms of S106 and CIL and it needs to be ensured that they are taking the development specifically benefits and any monies received are not used elsewhere in the area.
- Providing the development incorporates employment opportunities and is either self-sufficient or services at Brackley are expanded to accommodate a substantial increase in demand. It would be essential for a Brackley northern by-pass/link road to be in place before this development took place. Another situation where planning of roads and transportation links should be integral alongside residential and employment developments.
- Look at the re-use of existing unused buildings rather than build on new areas. Brownfield developments must be prioritised over green field developments. Expansion of existing areas, utilising existing infrastructure should be the primary consideration. Additional schools, doctors, leisure facilities etc. are required before further expansion.
- This site is on the wrong side of Brackley with regard to employment sites which are mainly at Silverstone and further north on the A43. The site is also divorced from the town by the A422.
- Natural in fill and will provide better road network for the whole town.
- Similar to Daventry, a good location to create a secondary centre in the south.
- Brackley needs increased infrastructure to be able to take this development. The town has suffered recent under investment in Police, Ambulance, and fire services, doctors' surgeries, Dental, school and nursery places. Roads will

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need considerable improvement and Brackley is not ready for further Building on the scale of the Radstone Field estate build until these important changes are made. The importance of keeping Brackley's Rural Market Town identity must not be lost it must be safeguarded for the future and urban sprawl must be stopped.

- This area is predominately Flood Zone 1 with Ordinary watercourses that drain the land towards the Great Ouse. The development of this area should be achievable in a sequential and safe manner, so not to place buildings in areas of flood risk and not increase flood risk elsewhere. The development of this area provides opportunities to provide small scale flood interventions that will contribute towards the management of flood risk within the wider Great Ouse Catchment.
- Stagecoach Midlands - With care. Broadly, yes, in part. We are sceptical that as many as 300 additional units should be accommodated though it is unclear from the consultation whether this includes completed development at Radstone Fields and adjacent areas that account for about 1400 units already. The consultation document sums it up well in our view: "Whilst physically associated with the town of Brackley, further north-westerly expansion is increasingly remote from the town's core service and employment areas, adversely impacting upon the potential accessibility of these areas by sustainable modes, including walking and cycling." To this we would add public transport as we do not see any business case for creating an entirely new bus route to serve further expansion nor would we be amenable to re-routing the existing one. Both options that are subject to current planning applications suffer from their distance from immediately available local services including Brackley Town Centre, and also from established regular bus service principally provided by route 500. This is slightly mitigated by the fact that much of the use of public transport is likely to be for longer-distance trips. However, both risk being highly car-dependent and experience at Radstone Fields, through which the 500 runs, shows that when set against car use, the service is not seen as very attractive despite having been operating up to every 20 minutes at peak times, for several years, and being available to residents relatively early in the development trajectory, which was quite a notable achievement. Both land parcels under consideration need to be considered as extending the town about as far as it credibly can be. Significant further work must be done to optimise the potential to create relevant public transport choices, including, perhaps, an efficient route for longer-distance services, or optimised cycle links to purpose designed interchange/interchanges at the Market Place and the new Medical Centre.
- Various promoters of the sites covered by this Option submitted representations supporting the proposals which they consider meet the objective of the plan.

Those who objected to spatial option 4a - Brackley North West Expansion raised the following key points:

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- Several respondents considered the option to be too remote from existing centre with poor access and connectivity that they considered will be difficult to improve.
- Several respondents considered the scale of the option excessive in regard to existing size of Brackley and its infrastructure.
- How far do you go before it no longer becomes a part of the town - Brackley extensions have developed to such an extent the newer areas have nothing in common with the 'old town' and commuting within the town has reached epidemic proportions given the distances involved. Way beyond the local need in my view, regional needs should be addressed elsewhere such as Milton Keynes/Banbury rather than turning Brackley/Towcester into another Daventry - a town of endless housing estates and no accessible to all unless you have a car, centre.
- The proposed expansion in this large area of countryside will be remote from the town centre. Residents of these developments would need transport to visit the town centre as it would be too far to walk and using a car is not good for the environment. Parking is already difficult if you have no other option and bus services have been cut or rerouted over several years.
- Local surrounding residents should have say (vote) on this matter.
- Totally out of proportion size wise. Will ruin Brackley and make it a less attractive place to live.
- Traffic increase. Too far from town. We must use brown field sites first.
- Heritage. Landscape. Transport
- Developer-driven development has no place in strategic planning. Where is the genuine and publicly supported evidence of need?
- This would be the 'best of a bad job'. If Brackley gets more development dumped on it then these sites are probably better than elsewhere. But these would just be an urban sprawl and Brackley is going to end up like Bicester! In particular the weaknesses for building anywhere in Brackley outweigh any so-called strengths.
- The road network is already in a mess without the additional load from another development. Manor road is often close gridlock around school drop off and pick up times. Need to reduce number of cars getting close to the schools for child safety and to keep the traffic moving. Could make it one way, could use the old health centre land as a drop off area etc.
- Most of the sites have some potential, but I feel that there is not enough ambition in the plans for Northampton. Why not go for all the growth there? Go for it achieving City status! One big infrastructure development, including roads etc. Must be less expensive than all the meddling with small sites.
- Brackley is bursting already these places all high traffic areas with not much means for local amenities for local people
- No destruction of the natural environment should be planned.
- I think focus should be on regenerating existing built-up areas, not building on 'green space' in the interest of profits for developers. Building on such areas will affect biodiversity, pollution, traffic, and existing infrastructure.
- This is a skewed question. Yes of course has the potential but that doesn't mean it is the right decision

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- A development of half this size may be ok.
- Several respondents consider that there has already been too much development at Brackley.
- In terms of percentage increase, this is too big and will cause a fractured community.
- Brackley cannot cope with any more housing developments. Please stop inflicting housing estates into existing residents. Choose a new site and start from scratch, build all of the new homes together in one new village with everything those people will need GPs, schools, shops, pub, parks etc.
- We need to stop building over our beautiful countryside. This impacts wildlife sites – aren't these supposed to be protected and enhanced not obliterated?!! We already have HS2 coming past us.
- It seems this development is too large for what the demand is it seems like the existing area is being swallowed whole and would lose its identity existing services would likely not cope, and with this council's track record of not developing them, or keeping their promises to do so, things will likely get worse instead of better
- A unique landscape much appreciated in the locality. The river valley in particular protects Northampton from flooding. This area has seen too much development and the build-up of traffic is unsustainable with regard to public health and (pollution) and delays in journey times. Please bear these considerations in mind when decision making.
- This development will have a serious detrimental effect on the environment, with increased use of cars and encroachment onto green field sites. The town's current infrastructure is not sufficiently robust to accommodate another large housing estate. Secondary school provision in particular would be overwhelmed. This plan will also see a further shift away from the core town centre and associated amenities. It seems that Brackley is becoming one very large housing estate with a severe erosion of the character associated with a small rural market town.
- All these developments mean we lose forever proper open countryside to be replaced by small pockets of themed green space. Our roads are already too busy, and services are overloaded. We do not need any more housing estates or warehouses. Use brownfield sites and protect our already endangered countryside.
- We are already at the limits, without inflicting further massive environmental damage on the environment.
- A great deal of highway infrastructure would be required. Adding to this the schools in this area are already full to capacity due to expansion already having taken place.
- Growth to the west of Brackley appears to be largely disconnected from the settlement with access only possible to the north and south. Unlike other recent development in Brackley which is well integrated with the settlement, growth to the west only looks to be included as an option due to constraints in other parts of the town – this does not mean it is suitable for development. The SHLAA assessment of Brackley west severely overstates the site's suitability for development, failing to recognise the open aspect of the site,

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particularly to the south, where development would be a significant intrusion to the rural landscape.

- Several respondents raised concerns over the adequacy and ability of the roads around the area to support further development.
- As small market towns especially in the case of Brackley with significant growth in recent years it is now in danger of becoming overcrowded and losing its identity. Furthermore, with HS2 passing so close by this may actually put off future homeowners in the area if new houses are built ever closer to its location with significant loss to all the green space around and a danger of encroaching upon much smaller villages in the area
- The strategy should not create dormitory (housing) communities for more distant employment opportunities that do not exist locally. Without an integrated public transport system that links these towns with the major larger towns such as Northampton, Daventry, Milton Keynes, Banbury, and Bicester and to their local villages, further growth will just exacerbate reliance on private cars. It is known that implemented and committed growth at both Brackley and Towcester towns has already taken us to the limits of what is acceptable in terms of constraints and current infrastructure capacity. Roads and other infrastructure must be in place before development and the scale of development must be in line with growth in local need.
- The proposal to extend Brackley – not just to the west, but to the north as well, raises many issues – mainly, the lack of infrastructure. If this level of development (3,000 dwellings) is necessary to fund all of the highway and other improvements, and I am not sure whether that would be enough or not, it may prove a cost too high. First, this is a disproportionately large addition to the ancient town of Brackley, effectively moving the centre away from the historic core. Secondly, the financial pressure on the development, necessary to fund the infrastructure improvements may make the project less financially viable and so lead to a reduction in the level of affordable housing.
- CPRE is concerned that a significant SUE has already been developed in this area - further expansion in this direction is remote from the town centre and impacting on open countryside and the hamlet of Halse. There are also the issues of lack of infrastructure as mentioned in question 23 and the pressure that additional provision would put on other aspects of the town and countryside which have not been considered alongside this proposal. For these reasons CPRE would not support this site.
- Brackley has also suffered like Towcester with hundreds of new houses. People don't want it anymore. Look closely at what's there, bus services.
- Responses received by the promoters of additional sites at Brackley not considered through the options consultation confirming that they consider their sites to be suitable, available, and deliverable and appropriate alternatives to the option 4a.

Comments made by respondents who did not specify 'yes' or 'no':

- This option would need a northern ring road in place
- Don't know how much Brackley has taken recently. Brackley does have a proper bypass. Does have to many roundabouts on it.

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- No comment on this area but would hope that our elected representatives will apply the objectives and points I have made related to the area that I know and live in, fairly and objectively to all considerations and maximise the benefits to all your stated and laudable objectives.
- Links to existing communities required. For a sports village a ring road around the town necessary.
- Sport England raises no comment about the suitability of the potential site allocation though it is considered that the need for a sports hub within the site needs to be reviewed. Further dialogue is required between the site promotor, Council, relevant club's and sporting governing bodies to establish the need for a sports hub and the deliverability of such a proposal. It should be noted that Sport England have engaged with a number of sporting governing bodies with several potentially occupiers of the sports hub indicating their desire to improve their existing sites as opposed to relocating. Further to this a new Playing Pitch Strategy would help to inform whether the hub site or off-site contributions would be required to meet the playing pitch demand generated from the growth planned up to 2050.
- Option 4a potentially impacts on the setting of the historic parkland of Steane which lies on the west side of the River Great Ouse, towards the village of Farthinghoe. Further assessment of the impact of Option 4a on this historic designed landscape is recommended.
- Buckinghamshire Council is less concerned about implications on Buckinghamshire from a northwest expansion of Brackley than an east or south direction of growth (which are not proposed) that would be likely to impact on the nearby villages of Turweston and Westbury. A more strategic consideration, however, would be the matter of flood risk from the River Great Ouse. It will be important to understand what potential there is for strategic growth at Brackley to increase flood risk in the town and so increase levels downstream into Buckinghamshire, for instance at the town of Buckingham. If a strategic growth option at Brackley is progressed, the Council would be keen to discuss traffic implications for routes towards Turweston and the A422 (east) and whether there would be increased flood risk at Brackley.
- Oxfordshire County Council - Option 4a is further away from the town's employment areas and therefore there is more likelihood of residents commuting externally, in particular to Banbury, but also potentially to Bicester and the Oxford area. It will be essential to assess how these connections could be made by sustainable modes to support climate action ambitions. In addition, the A422 approach to M40 Junction 11 is heavily congested, as are all the local roads coming into that junction. It would be beneficial to collaborate on how to relieve this situation by maximising the opportunities for non-car trips. For example, there is an aspiration to introduce a new Oxford – Bicester – Brackley – Towcester – Northampton bus service in the future, however Option 4a is in a location which could make it difficult to directly link to the proposed service. As a minimum, Option 4a should be linked to Bicester by bus for access to the rail network for connections to Oxford, Birmingham, and London. Should Option 4a come forward we would also welcome joint working on achieving an attractive inter-urban cycle route. Detailed comments are provided on the

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Oxfordshire Strategic Active Travel Network (SATN). Finally, as there is some cross-boundary movement of pupils between Oxfordshire and West Northamptonshire (particularly the Brackley area), any significant housing development, and/or change in school capacity in this area could have an impact on the capacity of Oxfordshire schools. We would seek to continue to work collaboratively in order to manage this potential issue

Parish / Town Councils Responses

The following Parish and Town Councils supported spatial option 4a:

- **Blakesley Parish Council** - Yes this is possible site but the SHLAA had other sites being promoted. A proper set of links to this to existing communities would be required. Such a level of development could bring the sports village, but there would be a need to ensure that there is a ring road round the town.
- **Blisworth Parish Council** (no comments)
- **Brackley Town Council** - Brackley has already seen significant developments in recent years and any further development must be accompanied by improvements to infrastructure and services before largescale development. Brackley's Town Centre is offset to the south and west of the town and therefore not in the centre. This needs to be taken into consideration. Development to the North and West will require a new hub of shops, services, and amenities to avoid the area becoming isolated and disconnected from the rest of the town. We also need to maintain/protect our 'Market Town' status. An Arterial Road Structure is needed to accommodate ease of access around the town and to the town centre, and to reduce congestion and pollution on smaller roads within residential areas. In addition to adequate road networks, new development should be properly connected with footpaths and cycle lanes. An expanded Brackley should include an expanded bus services that is made up of electric buses. There needs to be decent spacing between houses with gardens and roads wide enough to cater for moving traffic and residential parking. With development of this size there will need to be significant healthcare expansion, which despite recent investment, is currently under great strain as Brackley acts as a centre for the surrounding villages. There will be a need for a new school, especially for Secondary Education, as Brackley currently caters for the surrounding area. The local hub should include local shops. Car Parking with electric car charging points is a must in the new hub. The town as a whole would benefit from a new Youth Facility. Adding Allotments to the new development would provide a valuable contribution to the town. There is a concern with the amount of traffic already on the A43. It is suggested that this should be turned into a 3-lane road. Therefore, consultation with Highways England would be suggested. It is important to recognise Green Spaces as good for the wellbeing of our residents and would expect this to incorporated in any development.
- **Brixworth Parish Council** - This site is remote from the town centre, which is effectively near the southern edge of the town. This definitely will need effective connections for vehicles, cycling etc. Preserving the green areas and footpaths necessary.
- **Bugbrooke Parish Council** - If schools and health services are improved.

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- **Cogenhoe and Whiston Parish Council** (no comments)
- **Culworth Parish Council** - but local facilities are not good. Already much development.
- **Evenley Parish Council** - The Plan flags the need for further work on constraints and infrastructure requirements. We would add the need for long-term work on community development, integrating existing communities in with communities in new areas of housing. Plus, a clear statement that Brackley would be bounded by A43 and A422, and that these would not be crossed by development in future, in order to contain the spread of the town.
- **Greens Norton Parish Council** - Yes this is possible site but the SHLAA had other sites being promoted. A proper set of links to this to existing communities would be required. Such a level of development could bring the sports village, but there would be a need to ensure that there is a ring road round the town.
- **Long Buckby Parish Council** - Supports the proposal, which increases the size of an already substantial conurbations with established facilities and takes advantage of excellent communications
- **Nether Heyford Parish Council** (no comments)
- **Syresham Parish Council** - While there is potential for further residential development, it is not desirable. Any further development will again swallow up vast areas of natural habitats and agricultural land. The recent developments have already put pressure on education and healthcare services and any further largescale growth would need to be accompanied by improvements to essential services, including the provision of a new secondary school and another new primary school. The current High Street is not vibrant and doesn't provide enough retail options to serve an even larger population. Public transport around the town and connecting Brackley to other towns and surrounding villages also needs to be incorporated, as well as improvements to footpaths/cyclepaths to encourage active travel. Increased traffic will impact further on the already busy A43, A422 and B4525. Brackley, the surrounding villages and landscape have also been detrimentally impacted by the construction of HS2 and solar farms for many years, with a great loss of mature habitat and again, valued agricultural land.
- **Woodford-cum-Membris Parish Council** (no comments)
- **Yardley Gobion Parish Council** - Yes, this is a possible site but the SHLAA had other sites being promoted. A proper set of links to this to existing communities would be required. Such a level of development could bring the sports village, but there would be a need to ensure that there is a ring road round the town.

The following Parish and Town Councils object to spatial option 4a:

- **Hinton-in-the Hedges Parish Meeting** - This would be the 'best of a bad job'. If Brackley gets more development dumped on it then these sites are probably better than elsewhere. But these would just be an urban sprawl and Brackley is going to end up like Bicester. In particular the weaknesses for building anywhere in Brackley outweigh any so-called strengths.

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- **Daventry Town Council** - Brackley Town does not have the community infrastructure to support the increasing development, this would need to be considered to ensure community cohesion and provision of retail and other services to prevent it becoming a dormitory town.
- **Old Parish Council** - The Weaknesses outweigh the strengths.
- **Silverstone Parish Council** - This site is on the wrong side of Brackley with regard to employment sites which are mainly at Silverstone and further north on the A43. The site is also divorced from the town by the A422.

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Kislingbury Parish Council** – Declines to vote for particular options.
- **Little Houghton Parish Council** - LHPC finds it difficult to agree with further expansion of the towns into rural areas without understanding the impact on heritage assets, conservation areas and existing infrastructure - in particular the highways network. Building on the flood plain MUST be avoided. The potential for using brown-fill sites and under used town centre buildings for both housing and employment should be urgently assessed, together with an exploration of the identified constraints. Sites already identified within the JCS should be progressed before further land is allocated for development.
- **Weedon Parish Council** - Brackley is a small service town for a very rural area whereas Banbury and Silverstone are the big employment centres. Sensitive development in local villages seems more appropriate rather than trying to make Brackley compete with Banbury or Silverstone. They have a head start and there is already an established pattern of commuting from surrounding villages to these two centres.
- **Whittlebury Parish Council** – difficult to comment.
- **Wootton Parish Council** – additional information required.

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Question 25: Do you agree that spatial option 4b – Towcester South and Racecourse Expansion – has the potential to deliver residential development?

- 148 respondents said 'Yes'
- 446 respondents said 'No'
- 460 respondents provided specific comments

Those respondents who supported spatial option 4b - Towcester South and Racecourse Expansion raised the following key points: (These are grouped under headings for ease of reference)

General

- All associated services and infrastructure should be in place prior to development.
- It would be leveraging an already successful town so that the benefit could be felt more readily and more significantly.
- Based on the desire to build commuting settlements for the Oxford - Cambridge Arc, then this works quite well. The problem is with the assumption the Arc will benefit Northamptonshire.
- Significant preliminary work has been undertaken in order to explore some of the principles of development that would deliver residential-led development at the former racecourse and to the south of Towcester.
- Productive developer collaboration has been undertaken, and parties have worked closely in respect of bringing the spatial option forward.
- The delivery of growth at South Towcester will complement the existing and emerging new community at the Towcester Southern Extension (TSE), delivering high quality homes and local services, with a focus on the creation of sustainable communities.
- The current Towcester South development has gone well and should be extended further.
- Growth in this location is fundamental in delivering the Council's 2050 vision and objectives.
- Developing existing urban and town areas, with their existing infrastructure, seems to be most compatible with the objectives, as it minimises carbon impact and retains the overall character of the region.
- There is space but pull factors are limited by poor access and by limited infrastructure / forward planning which discourage people from the wider area wanting to live in Towcester.
- The housing should be controlled to support people who work in West Northamptonshire, as opposed to Milton Keynes.
- A smaller site should be considered in this location.
- It benefits from being close to a range of services and to Milton Keynes.

Highway's issues/capacity

- It is critical that the road infrastructure is carefully considered and options for mitigating the existing backlogs of traffic through Towcester are given.

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Particularly as the A5 is an alternative route whenever there are issues on the M1, which then completely blocks the narrow high street with HGVs.

- It is critical that the road infrastructure is carefully considered and options for mitigating the existing backlogs of traffic through Towcester are given. Particularly in view of the other proposed developments around the town such as the DHL depot and the Podium, which will inevitably generate more traffic that won't be accommodated by the new relief road.
- An adequately designed Towcester bypass would need to be built, prior to additional development commencing, as traffic on the A5, including the pinch-point through Towcester town centre is abysmal.
- The relief road has created an opportunity for further growth: the current proposal does not seek to overburden that infrastructure, rather it will deliver complimentary infrastructure and services which will further enhance Towcester as a key growth location. Given the development would capitalise on committed road infrastructure, the scope exists to focus investment within the development areas to maximise social, environmental, and economic benefits.

Associated Infrastructure

- There is no mention of the provision of additional doctors, dentists, schools, police, fire, hospital, and ambulance services.
- It is clear that future growth within West Northamptonshire needs to be infrastructure led, ensuring key services and facilities are delivered when and where they are needed, taking account of existing capacity and the phasing of future development. The only way of achieving this objective is through large scale, well-coordinated development. The expansion / growth in South Towcester will maximise the potential of the existing investment in and committed to the Towcester South Expansion, which will provide confidence and certainty for future growth in this location.
- These proposals would have a significant impact on police and fire operations and would be served by Brackley and Towcester fire stations and Brackley and Campbell Square police stations. It should be noted that Towcester is served by a community policing team and a retained fire service only and any major incident would require attendance by the relevant service based in Northampton. Information is currently being sought on the capacity within these facilities, but it is expected that additional cover and investment will be required to meet the needs of these developments.
- Infrastructure already in place to support the development.

Racecourse

- The historical aspects of the racecourse should be incorporated within any future development.
- the Racecourse has too many heritage and setting constraints to be viable.

Flooding

- This area has parts that fall within Flood Zones 1, 2 and 3. Using a sequential approach development can be achieved ensuring future occupants are safe

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from flooding. The two main areas contain, or are adjacent to, Ordinary Watercourse tributaries of the River Tove and to the river itself. The development of this area provides opportunities to provide small scale flood interventions that will contribute towards the management of flood risk on the River Tove and within the wider Great Ouse Catchment.

- There are Natural Flood Risk Management Options that would reduce flood risk and enhance the developments environment. If this area is allocated, we would expect the associated policy to support/require the development achieve net flood risk reduction in line with the requirements of the National Planning Policy Framework (NPPF) and the Environment Agency's Flood Risk Management Strategy.
- The sites are not in a groundwater Source Protection Zone (SPZ) but are underlain by secondary and principal aquifers. The regional use of groundwater in this area makes the site vulnerable to pollution. However, we understand that the sites comprise predominantly greenfield undeveloped agricultural land.
- The Water Companies will need to consider future growth giving regard to the capacity in the sewerage network, to allow them to make medium and long-term infrastructure plans, where necessary.
- Any new developments will need to follow the Water Framework Directive (WFD) requirements to demonstrate no deterioration of river quality and aim to achieve Good WFD status.
- Water cycle studies may be required/refreshed.
- Flooding will be mitigated through the completion of a flood risk assessment and the implementation of recommended measures including sustainable drainage techniques.

Those who objected to spatial option 4b - Towcester South and Racecourse Expansion raised the following key points: (These are grouped under headings for ease of reference)

General

- The impact of development would not be capable of sufficient mitigation to outweigh the level of harm that would arise.
- Other more appropriate sites exist in the administrative area, which should be considered for release for development prior to this land - as part of this process the LPA needs to demonstrate that all alternative options have been considered.
- The document brochure states that the site is being put forward for residential; however, within the spreadsheet supporting document it states, 'Part of the site is promoted for employment and subject to appropriate design and layout may be considered suitable provided that it respects the historic character of the registered park and garden'. The site is being consulted on as residential and if there is to be employment a further consultation should be undertaken.
- Query whether the site relating to Towcester Racecourse should have been allowed within this document at all, having only recently been submitted for consideration under the Local Plan Part 2 (adopted summer 2020) and

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excluded due to its unsuitability and the impact on the local highway network amongst other issues. It appears no additional information or justification that would mitigate the concerns raised during the Local Plan Part 2 consultation and no material policy changes have come into force in the meantime that would change the previous stance.

- Query why both Towcester sites have been brought in as one, due to the separation between the two, they have very different constraints and implications. These should have been split for consultation as it is noted that many of the ‘points’ that each site had to comply with do not apply to the Towcester racecourse site (such as proximity to schools etc); whereas the site to the south does. This emphasises the Towcester spatial option should be assessed separately as two different schemes.
- The spatial objectives for ‘Green and clean’ are in direct conflict with the Towcester site.
- Towcester should not be further extended to become 3 times bigger than its original size – the approved extension already doubles its size. Now you are planning to add more. Towcester has had enough construction and can take no more without severely damaging the look and feel of a rural town.
- The scale of the proposed development here would be a disaster without infrastructure planning. Any residential development needs to be accompanied by associated infrastructure such as doctors’ surgeries, medical facilities, schools, community centres, sports facilities etc
- Towcester is currently surrounded by fields, woods, etc which are important for recreation and mental health / wellbeing.
- Much is talked about wellbeing but, when it comes to it, all we hear about is physically challenging sport and nothing for the older residents.
- The quality of life of current residents should be considered.
- Air pollution would be increased.
- The proposed development is way beyond the local need: regional needs should be addressed elsewhere such as Milton Keynes rather than turning Towcester into another Daventry - a town of endless housing estates and no evident accessibility to services unless you have a car.
- Agricultural land is required to produce all of the food it can, in order to help the balance of payments, make available high-quality food produced in the right way and support our farmers who look after the countryside - future development should be focussed on brownfield sites.
- Sufficient affordable and social housing would need to be incorporated within any future development.
- The sewerage works near Cappenhamb Bridge is already over capacity resulting in large numbers of tankers moving sewage daily from this plant to the plant near Stoke Bruerne for treatment. Furthermore, the works routinely discharges raw sewerage into the River Tove as a result of the hundreds of new houses built in Towcester with thousands more already being built.
- If any part of this proposal is to proceed it must be a condition of planning that every house built must have solar panels for hot water and electricity and be fitted with ground source heat pumps for heating. They should also be fitted with an electric car charging point.

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- The SUE does not reflect the diverse needs of a community. Many live with challenging health issues and many wish to downsize and move nearer to families as age takes its toll. There should be a proportionate number of bungalows which could accommodate these needs.
- Is the council only promoting this site as an aunt sally to remove it later and claim that they have listened to the responses in the consultation?
- Growth proposals need to be considered in conjunction with those proposed in Milton Keynes with cross border working.
- Proper consultation should include advising all residents and businesses in Towcester and the wider affected area to be fully appraised on this plan by personal correspondence/letter/ email etc. rather than relying on a chance encounter.
- the new West Northants Council are making decisions based on how much income they can grab through development, in order to demonstrate how they are so much better than previous failed councils.
- The National Farmers Union states we should not go below 60% of home grown produce, but with the pressure on land in this country from various types of development and its infrastructures it will be difficult to maintain that figure. Also, we cannot and must not rely on the imported foods long term. World populations are growing rapidly, and those food producing nations could need the produce for their own people. Therefore, it must make sense to safeguard good quality land to provide good quality food with high welfare standards for our own nation.
- A smaller site would be more appropriate in this location.
- No doubt in 50 years there will be further plans to develop the surrounding fields around Towcester and these associated issues should be addressed now to avoid problems for future generations.
- Michael Gove, the Housing Secretary said that the Government is looking at how “housing need” is calculated, amid fears it is based on out-of-date assumptions. Local planners would be well advised to wait the outcome of these latest government initiatives before committing us to something that is clearly neither wanted nor needed.
- Growth to the east of the A5 should be removed from the plan as this extensive area of parkland and agricultural landforms part of the essential character of Towcester and great care must be taken not to diminish it.
- Growth to the east of the A5 would be contrary to Corporate Priority 1 - Green and Clean; Strategic Priority 3 - Connected Communities, and Strategic Objectives 1 – Climate Change, 3 – Landscape and Strategic, 4 – Heritage, 8 – Connections, and 9 – Protecting and Building Urban Communities.

Highway issues/capacity

- Traffic is already too great for the town, including HGVs, causing noise and contaminated air quality.
- Towcester is struggling at present with only 600 of the Towcester South houses in place, no relief road and no quantifiable evidence demonstrating the relief road will make a significant impact to what is an appalling congestion and traffic problem through and surrounding Towcester. The traffic issue is

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not making Towcester a ‘great place to live, work, visit and thrive’ with many boycotting the centre of Towcester and surrounding area due to traffic issues and even more working from home due to the impact the traffic has on their travel time and working day.

- It should be taken into consideration that if there are any issues/accidents/ roadworks on the M1 Towcester is immediately gridlocked as the traffic is diverted down the A5.
- It is widely stated that the road network, on both links and junctions, in and surrounding Towcester is at capacity, with the congestion effecting local villages and the desirability to visit Towcester. This is the case with only 600 of the thousands of houses under construction at the Towcester Vale SUE - we are not in a position to make decisions on further future residential development in Towcester until the full impact of the ‘relief road’ is realised. At this point it is unclear whether further mitigation will be required once all homes are occupied, coupled with the recently submitted commercial/industrial developments at Tiffield and by Bell Plantation (the DHL site) which will have an enormous impact on the road network as we know it due to the proximity to Towcester, the A5 and A43.
- The objectives at the core of the Spatial Options Plan submitted includes impact on economy. The volume of traffic and congestion has a hugely negative impact on visiting economy. The proposals as put forward, alongside the recently submitted proposals brought in under allocated sites adopted in the Local Plan Part 2, will exacerbate this issue to a point where the High Street will be redundant. Towcester is becoming a place to avoid instead of a place to visit.
- The proposal will not only negatively impact the traffic through Towcester but surrounding villages, to both the south and north of Towcester. In particular, Shutlanger Stoke Bruerne, Alderton, Blisworth, Duncote, Poulterbury and Pury End will be severely affected by people using the route as a cut through/workaround to avoid the congestion hot spots. These villages already have issues with speeding which will be further aggravated.
- Turning out from the villages to the south of Towcester on the A5 can already take significant lengths of time at busier times, particularly if turning right across the carriageway, without adding further traffic.
- Without an integrated public transport system that links the town with the major larger towns such as Northampton, Daventry, Milton Keynes, Banbury, and Bicester and to their local villages, further growth will just exacerbate reliance on private cars.
- The proposals in Northwest Milton Keynes (5b) need to be considered alongside this proposal. The whole area would become grid-locked creating even more problems on an already over-crowded A5 towards Milton Keynes.
- Additional traffic will struggle to flow down the A5 which is already a busy and dangerous road. This will put pressure on the roundabout at Old Stratford. This is already a pinch point, and this is set to get worse with all the additional traffic coming from the road / rail terminal being currently built between the M1 west side and the village of Roade. Thousands of vehicle movements will head down the A508 to Old Stratford.

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- There is a network of footpaths and bridleways which cross the site which would be lost and impact on the communities' health and enjoyment.
- The Grafton Way path would hardly merit being a country public footpath. It would be surrounded by garden fences.
- Will increase demand for commuting transport to London and elsewhere. This has implications for the station at Milton Keynes Central and other local stations, as well as the capacity of the railway line.
- There is no provision for an eastern bypass for Towcester just more development in the only area that could provide one.

Historic Interest

- Towcester is a rural town of historic importance. It is being made into a characterless polluted large town/small city.
- Can we be assured that the local character of Towcester will be considered?
- The comment that 'valued landscapes have been preserved and enhanced' is in direct conflict with the proposal at Towcester Racecourse which is valued land within historic park and garden with ridge and furrow, as well as a mill mound and historic workings, which makes the area important in terms of historic land and archaeology.
- Sites that lie within Historic Park and Gardens were to be excluded at Stage 1 of this process in line with the process requirements of Planning Policy Guidance (PPG). The Towcester Racecourse site is within a Grade II* registered park and garden, includes a Grade I listed building and is within the setting of a number of other listed buildings and non-designated heritage assets. Heathencote village has two Grade II listed properties that would also be affected. These buildings are some of the most significant in the country and as required by the National Planning Policy Framework (NPPF) should be preserved or enhanced (paragraph 200).
- The South Northamptonshire Local Plan Part 2 (LPP2), adopted only last year, has specific policies relating to Historic Park and Gardens (Policy HE3), Policy HE5 – Listed Buildings and Policy HE6 – Conservation Areas. It is difficult to understand how a site with such clear constraints and conflict with policy has been put forward: when considering the whole of the West Northamptonshire district. There must be more suitable locations than a historic park and garden, with numerous listed buildings, in close proximity to two Conservation areas (Towcester, Easton Neston Estate).
- Policy clearly states 'where harm is considered to be substantial those benefits must be substantial' which would not be the case with this development.
- The part of the proposal for residential development which lies within the nationally significant Grade II* Registered area of Easton Neston Park is of major concern. The damaging impact of such development upon this important heritage asset would be considerable and irreversible, effectively removing that entire southern section of historic park which lies beyond the River Tove. Development would also isolate the outstanding Grade I Listed Chain Lodge entrance gateway from its function and setting and would

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remove parkland views from the historic parkland north of the River Tove to the south and east.

- No mention is made of the Roman Villa and potential temple site at Wood Brucite which is within the mapped area (SP685469). This has only been partially excavated and has the potential of being of national significance as there is some evidence to indicate that the “Towcester Head”, currently on display at the British Museum, may have been found when a small reservoir for the town’s water supply was constructed close to the Roman site in the late 19th century. The area covered by this Roman site has not been fully identified but the costs involved in excavation etc. is likely to mean that development would probably be financially unviable in this area.

Ecology

- You are making Towcester a polluted large town/small city and destroying the wildlife.
- The development of farmland, that is presently compliant with a number of schemes to improve and conserve natural habitats and biodiversity, would be in direct conflict with the objective as put forward under Objective 2: Green Infrastructure and Natural Capital.
- No net biodiversity could mitigate the impact of the development proposed at Towcester.
- The plans will lead to the loss of the diverse and rich habitat on this land with a wide variety of native mammals and birds, including Buzzard, Red Kite, and owl populations.
- The loss of ancient woodland cannot be mitigated.
- Taylors’s farm has a good environmental record with many species of flora and fauna being boosted by environmental schemes encouraged and promoted by DEFRA.

Landscape

- The proposals would result in harm to the landscape character and important vistas.
- The existing Towcester South SUE was planned and designed to create an appropriate new urban edge to the town, with the relief road forming the boundary of the extended settlement. Building beyond the relief road (whether on all or part of the area identified in the spatial option) will not only negate this previous design led approach but would result in significant visual intrusion further into the open countryside, exacerbated by the higher ground levels here which would make any new development extremely visible in distant views, whatever attempts were made to try and visually contain it.
- Towcester Racecourse - Significant intrusion into the open countryside on visually prominent land and it would be poorly related to existing housing development.
- Light pollution will adversely impact on both the landscape and ecology of the area.
- The proposed areas of development reside in the National Characteristics Area 91 (NCA 91) Yardley Whittlewood Ridge. Quoting from NCA 91 “Despite

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being close to Northampton, Milton Keynes and Towcester, the Ridge retains a rural character due to its sparse population and lack of major settlements.” Continued residential development in the area will be to the detriment of the character of the area. Further detail of the devastating impact the proposed additional residential development would have can be found in Natural England’s Profile of NCA 91 on their website.

- This proposal is visually on the wrong side of Towcester and the buffer to the countryside provided by the Easton Neston Estate should be seen as an asset to be maintained and not circumvented.

Flooding

- Part of the site is liable to extensive flooding which has been widely documented over the years - only last year flooding from Wood Burcote ran down to the centre of Towcester.
- Part of the Stage 1 process of eliminating sites included those within a flood zone. It should be taken into consideration that the hundreds of acres of greenfield being proposed for development currently hold huge amounts of rainwater run-off.
- With winters getting wetter due to global warming, we are experiencing flash floods more frequently.
- With the topography of the land being higher such as Highfields to the south of the town centre, The Shires estate to the north, business to the west i.e. supermarkets and then the proposed development further extending to the east; the centre of Towcester will be surrounded and sat at the bottom of a bowl so it is inevitable that surface water will end up at the high street as well as the River Tove which already regularly bursts its banks into the Water Meadows and the bottom of the Shires estate, let alone the farm land by Twicketts Mill proposed to be developed.
- Much of the land around the Racecourse and Taylors Farm is needed as a flood plain and we haven’t yet seen how the River Tove will react and cope with current developments let alone further ones.
- The town’s runoff and flood water have a significant impact on what happens down river. On Taylors Farm there is a gauging station that is vitally important for the Environment Agency to monitor the river levels and flow to protect communities as far away as Bedford.

Siting

- The spreadsheet provided states that mitigation should avoid residential development on part of the site covered by the Registered Park and Garden, however this would then result in physical and visual coalescence that would harm the identity of the Town, in direct conflict with policy.
- At points of the site the housing will be closer to Shutlanger than Towcester Town.
- The spreadsheet provided notes that ‘the scale of development is out of keeping with existing settlement structure’. The Weaknesses stated in the booklet provided mentions that the southern relief road could additionally

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adversely impact the potential permeability of much of the proposed expansion with the rest of the town.

- With this proposed development Towcester will be built into established historic settlements such as Heathencote and with only a short distance from Pury End and Paulerspury - concern that that this development will lead to further development into those areas. Towcester will lose its identity and will become sub divided into districts.
- The proposals are in direct conflict with Objective 12- Supporting rural communities.
- This possible development will destroy our rural environment as Silverstone, Towcester and Whittlebury all begin to merge into one built up area.
- Objective 15 supports rural employment, especially those relating to agriculture, the proposal as it stands builds over Taylors Farm in its entirety. The farm is occupied by generational tenant farmers who will lose their home and livelihood.
- Taylors's farm is highly productive, and the soil is in first class condition following many years of livestock farming.
- The strategy should not create dormitory (housing) communities for more distant employment opportunities that do not exist locally.
- This development is increasingly remote from the town's historical core and as such is undesirable.
- There are significant benefits both locally to Towcester but also to West Northamptonshire as a whole to recognise, allocate and support strategic employment growth to the north / north west of Towcester, as a key facet of the emerging Plan's spatial strategy and wider regional aims being delivered through the Oxford Cambridge Arc.

Loss of the racecourse

- Towcester's main asset by far is the racecourse. It is famous countrywide and is steeped in history. Before it got into financial difficulties it attracted top jockeys and trainers as a build up to the Grand National, AP McCoy won his 4,000th winner at the track in 2013. It would be devastating and irreversible to have this image of Towcester developed into houses.
- The racecourse should be considered a community asset, a sport and social venue that could bring visitors to the Town, boosting the local economy and providing employment opportunities. It is presently not being utilised to its full potential.
- it is imperative that the racecourse does not just become a monument to the town's past and that it is carefully integrated to give greater public access with sports and recreational facilities for the wellbeing and benefit of the townspeople.
- The viability of the racecourse cannot be assessed over the COVID-19 period (as per government guidelines on community assets such as Public Houses) but it should be noted that as a largely outside venue there are endless opportunities to generate revenue.
- The Racecourse should be supported as a business to diversify and generate further income and opportunities rather than written off and developed over.

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Schools

- With Sponne School being the only secondary school and already at capacity any more residential development within the Towcester area would exacerbate this problem. Especially as other local secondary schools such as Roade and Deanshanger are undersubscribed.
- We have an oversubscribed secondary school which means children who formerly went to their nearest school are now being bussed many miles.

Comments made by respondents who did not specify ‘yes’ or ‘no’: (These are grouped under headings for ease of reference)

General

- The proposal requires careful reconsideration. There is a lack of employment opportunities in the area and significant associated infrastructure and community facilities would be required.
- As we look to create a more sustainable future, we will need to prioritise planning for houses closer to where jobs are.
- Consideration of potential impacts to the [Grand Union] canal, its users and associated infrastructure from increased vehicular movements and increased use of the canal for leisure / recreation purposes would be required.
- Land to the north-west of Towcester should be allocated for employment purposes in conjunction with the proposed residential development to enable organic growth.
- The concept of 20-minute neighbourhoods provides places in which most of people's daily needs can be met within a short walk or cycle (broadly a 20-minute travel time by cycle or on foot). The benefits of this approach are multiple.
- Developer section 278 and CIL contributions do not appear in any way significant enough to support appropriate provision of many elements which are critical to the success and sustainability of an enlarged Towcester.
- Planning has the potential to play a vital role in cutting carbon and preparing us for the impacts of climate change. The Committee on Climate Change is advocating a strong focus on effective planning to deliver the action we need. But the current English planning system is not delivering on its positive potential to tackle the climate crisis. The Secretary of State should issue a ministerial statement to galvanise action through planning and seize the opportunity of a resilient, net zero future.
- We need a masterplan for West Northants which is forward looking and accepting of the impending challenges which will be brought by climate change.
- Whilst it is agreed that there could be advantages for the proposal for an SUE on the south side of Towcester, it should not be for such a large number of dwellings. A reduced area should be proposed.

Historic Interest

- The racecourse probably has potential, but that's not the point is it? it's a heritage site and should be used for something more fitting.

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- Whilst the site is some distance from the [Grand Union] canal, visual impacts may need to be considered as part of an LVI.

Highway issues/capacity

- the traffic on the A5 is already very congested. If this proposal were to go ahead without the correct infrastructure in place, we will have a road that is constantly grid locked.
- The roundabout at the Old Stratford is already congested at peak times and often at non-peak times with traffic coming from Milton Keynes to the roundabout almost back to the Stacey Bushes turn.
- Most traffic from housing travels south on the A5 towards and into Milton Keynes, through the only northern entrance at Old Stratford roundabout, which is currently inadequate and Highways England, being aware of this, are trying to get the A5 de-trunked so it becomes a WNC problem. Serious money needed to resolve this issue - guesstimate £100m.
- Associated improvements to local bus services, cycleways and footpaths would be very welcome.
- Towcester has always struggled to maintain a meaningful public transport offer. This is an exceptionally hard to resolve - attempts to improve connectivity and frequency between 2005 and 2011 had some success, but insufficient to prove financially sustainable. COVID has had an especially serious impact.
- The Plan needs to advance a strategy that breaks the town free from some of the highest levels of car dependency and congestion anywhere in the plan area, and indeed in England, if it is to be soundly based. From the point of view of public transport integration, there are obvious potentially good opportunities, but this is highly dependent on master planning and the way that development relates to the existing settlement and the Towcester South Sustainable Urban Extension, across the Relief Road which by its nature is primarily intended to perform a strategic movement function.
- The broad swathe of proposed development at Towcester breaks down very clearly into 1) land south and west of the town – beyond the Southern Relief Road – and 2) that at the Racecourse to the South East.
- The Racecourse area seems especially hard to integrate into the built form and will provide what amounts to a lobate form of development, stretching away from the A5 which will be the logical route for any bus service towards Milton Keynes, as it was in the past. It will not support a bespoke bus service of any kind, and it will tend towards driving further demand for longer-distance car-borne commuting on the SRN.
- The existing SUE was always going to be exceptionally hard to provide relevant bus services to by virtue of its siting, extent, and lack of integration to the pre-existing urban edge. In fact, we have for many years been concerned that most of the western tranches will be impossible to directly serve by bus – a point made prior to the planning application being lodged and determined. However, there exists a clear opportunity to create a new direct link between the south western edge of the town and the SUE, and Silverstone through land under promotion, lying north of Wood Burcote Lane. This would tie

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directly into the A413 and allow buses to run between Towcester and Silverstone relatively quickly. It is critical that urban design facilitates this, for this option to work. Such a link would then place both the new as well as the existing/committed developments directly on a logical route between Northampton and Silverstone, and potentially beyond to Brackley and Bicester. An alternative strategy – depending on how free-flowing the A43 remains – would be to use the relief road to facilitate a high-quality public transport spine with development on either side of it, and two or more high quality rapid-transit style facilities offering accesses from both the SUE on its north/east sides and any new development to the south and west. This is going to need revision of the consented master plan for the SUE such that development does not turn its back on the relief road. The challenge that this poses for both urban design and the way in which the relief road functions, is obvious, but the experience with the Sandy Lane Relief Road through Norwood Farm (elsewhere in the JCS area) gives the Council a head start in establishing how this might be resolved.

- There is a residual serious concern that large scale new development at Towcester will simply flood the existing network and the Relief Road with additional traffic all around the town. Grade separation of the Abthorpe and Tove Roundabouts has been examined in the past and ruled out. This means that any option for significant further expansion of Towcester must be led by a robust and deliverable vision for sustainable modes, including public transport. It may well be that the quantum that can be accommodated has less to do with physical constraints and more with the credible capacity of local highways infrastructure.

Ecology

- The proposed development area includes an ancient woodland. [Burcote Wood (grid reference SP 6937 4625). There is also an undesignated woodland at grid reference SP 6900 4661. Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless “there are wholly exceptional reasons, and a suitable compensation strategy exists” (National Planning Policy Framework paragraph 175 amended July 2018).
- At a time when we are experiencing significant loss of biodiversity in the UK and globally, we should not plan to impact that which is in existence and forms part of the rural nature of the area (even if it can be potentially mitigated).
- If Spatial Option 4b is approved it is recommended that the residential development design allows for a buffer zone around the ancient woodland, in accordance with Government Guidance (specified).

Schools

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- The schools are oversubscribed, and it is difficult to get your child into a school in an area close to home, often requiring travel to a school out of the area.

Comments from neighbouring councils

- Buckinghamshire Council - Spatial Option 4b – could lead to increases in traffic from the A5 onto the A43 and so have an impact beyond the border of Northamptonshire. There are a number of junctions into rural Buckinghamshire off this route and of course it runs close to Silverstone, a strategic employment, visitor, and education area. If this option is progressed, Buckinghamshire Council would wish to discuss transport implications, in particular with West Northamptonshire Council, to assess traffic levels and evaluate infrastructure improvements needed.
- Milton Keynes Council - There may be an associated impact on local infrastructure and an impact on Milton Keynes given the quantum of proposed development. There is particular concern that the cumulative impact of development at Towcester and Old Stratford (spatial option 5b) could worsen traffic congestion and adversely affect the functioning of the A5 and the Old Stratford roundabout and the local highway network unless properly planned and moderated. The junction is a key gateway to Milton Keynes. We would want WNC and National Highways (who control the A5 and Old Stratford roundabout) to work with us on modelling and assessing the implications of this development and with partners such as the Central Area Growth Board, SEMLEP and England's Economic Heartland to ensure that proper infrastructure and funding is in place for early, sustainable, and funded solutions, such as our proposed Mass Rapid Transport System (MRT).

Parish / Town Council Responses

The following Parish and Town Councils supported spatial option 4b:

- **Brixworth Parish Council** - A reduced allocation in this area would have less adverse impact. Concerns raised with respect to the impact on conservation areas and heritage buildings.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Culworth Parish Council** (no comments)
- **Long Buckby Parish Council** - Supports the proposal, which increases the size of an already substantial conurbation with established facilities and takes advantage of excellent communications.
- **Nether Heyford Parish Council** - Support - But only with significant investment in infrastructure such as roads and schools. This to include serious consideration for an eastern relief road.
- **Woodford-cum-Membris Parish Council** (no comments)

The following Parish and Town Councils objected to spatial option 4b:

- **A5 Alliance of Parish Councils (Cosgrove, Deanshanger, Old Stratford, Potterspury, Wicken and Yardley Gobion)** - Towcester Racecourse is historic registered parkland and a valuable asset to those living in Towcester and beyond. WNC are aware of this and the plan itself states that this would

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be difficult to develop and have a lot of opposition from heritage bodies. Increasing the traffic using the already congested A5 would have a wide impact on the road system. The proposals in Northwest Milton Keynes (5b) need to be considered alongside this proposal. The concern is that any new development on that site would create even greater problems on an already overcrowded A5 southbound toward Milton Keynes.

- **Blakesley Parish Council** - This is a poor recommendation and given the history should not have been included - Towcester Racecourse is historic registered parkland. The proposed Towcester Southern Extension to the existing Southern Extension is excessive. The Towcester Relief Road would then become an estate service road and give no relief to Towcester at all. If it were expanded to a full dual carriageway, it would split the development and thus contradict Objective 9 of this plan. The spatial plan does not give any indication as to the traffic generated and its effect on the A43, A5 or other local roads. These are at capacity now. A proper vision would have addressed these issues and given residents the comfort that such things are being thought about, as it stands there is nothing to offer on the upside, just more housing. This extra extension would need to have a hard boundary with a full dual carriageway from the A43 to the A5 at Milton Keynes. This needs to be in place before any development. The proposals in north-west Milton Keynes / Old Stratford need to be thought about in relation to this. The area would be bookended with two allocations totalling 10,500 homes and no mention of the combined effect on the local roads.
- **Blisworth Parish Council** - Pressure will be placed on surrounding rural communities caused by excessive development.
- **Bugbrooke Parish Council** - The Racecourse is a grade II listed park and garden. It is a great asset to the area, and it should be used as a destination venue and expanded as a cultural centre in South Northants. The concerts, events, festivals are of great importance we need to ensure that this facility exists in South Northants. Any further development in Towcester should not take this away. There is the ancient woodland and the ecological impacts to consider. The road network around Towcester is already at breaking point with daily traffic jams. Further development does not seem viable.
- **Cosgrove Parish Council** - This is historic registered parkland and would be difficult to develop and further impact on the A5 towards Towcester, Old Stratford, and the local roads.
- **Daventry Town Council** - Towcester does not have the community infrastructure to support the increasing development. This would need to be considered to ensure community cohesion along with the provision of retail and other services to prevent it becoming a dormitory town.
- **Easton Neston Parish Meeting** -The Plan acknowledges that Towcester has had significant growth in the last 20 years, and it comments on the constraints and infrastructure requirements which will be needed. Towcester cannot carry any further development, yet the plan incorporates proposals for further expansion. The road network in the local area around Towcester is already at breaking point in terms of volume of traffic and the resultant pollution

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problems. The concept that the southern relief road would service further new dwellings is a mistake as the National Highways report states that the relief road will be at capacity when the 2700 new dwellings to the south and west of the town are completed. Regular closures of the M1 motorway, and the resulting diversion of traffic into the Towcester area, reduces the area to gridlock. Further local development is simply not sustainable and will adversely affect the wellbeing of local residents unable to go about their daily routine. Residential development at Towcester racecourse would be inappropriate given the limitations of the Towcester and Easton Neston Conservation Areas. Conservation areas have special status and need protection. If change has to happen, the challenge is to manage it in a way that preserves, reinforces, and enhances the special quality of the area. Our belief is that development at the racecourse would have a significant impact on the nature of the conservation areas and the mitigation needed, if indeed possible, would be so substantial, it would be impractical. The WNJCS (2014) sets out a long-term vision and objectives for the whole of South Northants to 2029, including strategic policies for steering and shaping development. Policy BN5 says. ‘Designated and non-designated heritage assets and their settings and landscapes will be conserved and enhanced in recognition of their individual and cumulative significance and contribution to West Northamptonshire's local distinctiveness and sense of place.’ It appears that this new Proposed Strategic Plan has ignored this previous long-term vision.

- **Greens Norton Parish Council** - This is a poor recommendation and given the history should not have been included. The Towcester Racecourse is historic registered parkland. The proposed Towcester Southern Extension to the existing Southern Extension is excessive. The Towcester Relief Road would then be an estate service road and give no relief to Towcester at all. If it were expanded to a full dual carriageway it would split the development and thus contradict Objective 9 of this plan. The spatial plan does not give any indication as to the traffic generated and its effect on the A43, A5 or other local roads. These are at capacity now. A proper vision would have addressed these issues and given residents the comfort that such things are being thought about, as it stands there is nothing to offer on the upside, just more housing. This extra extension would need to have a hard boundary with a full dual carriageway from the A43 to the A5 at Milton Keynes. This needs to be in place before any development. The proposals in North West Milton Keynes/Old Stratford need to be thought about in relation to this. The area would be bookended with two allocations totalling 10,500 homes and no mention of the combined effect on the local roads.
- **Old Parish Council** - The weaknesses outweigh the strengths.
- **Old Stratford Parish Council** - This is historic registered parkland and would be difficult to develop and further impact on the A5 towards Old Stratford and the local roads.
- **Potterspury Parish Council** - Towcester Racecourse is historic registered parkland and valuable asset to those living in Towcester and beyond. Until recently it was being promoted as a tourist site. Developing it would be a

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tragedy in terms of landscape and ecology. The stated weaknesses appear overwhelming. Furthermore, increasing the traffic using the already congested A5 would have a wide impact on the road system. There is no indication as to the traffic generated and its effect on the A43, A5 or other local roads. The strategy appears to simply add more housing. The proposals at Old Stratford (Option 5b) need to be considered. The A5 from Old Stratford to Towcester could have two allocations totalling 10,500 homes at the ends. A huge impact could be expected with the combined effect on the local roads. Already there is serious congestion at both ends of this stretch of the A5.

- **Shutlanger Parish Council** - Object to your spatial options consultation and in particular site ID 51. The northern section of area 51 appears to encompass the whole of Towcester racecourse with grade 1 listed structures and adjoining the grade 2 listed landscape north of Easton Neston House. Together with areas 235 and 236, area 51 will obliterate a significant part of the Easton Neston estate including loss of the amenities at Towcester water meadows. These amenities are enjoyed by residents of Shutlanger as much as residents of Towcester itself. The northern section of area 51 covers the meadows leading up to Cappenhamb Bridge. These meadows frequently flood in the autumn, winter, and spring, with many waterfowl staying on this area for prolonged periods. The plans will lead to the entire loss of the small farming community at Heathencote - some members of which have been farming this land for several generations. They are custodians of the diverse and rich habitat on this land with a wide variety of native mammals and birds, including Buzzard, Red Kite, and owl populations. The road infrastructure through Shutlanger is totally inadequate to cope with the volumes of traffic that area 51 will generate. The Main Road between Shutlanger and Heathencote is poorly surfaced with very narrow stretches through Shutlanger. Beyond Shutlanger the road meets very restrictive bridges over the Grand Union Canal at Stoke Bruerne or over the old railway line heading into Blisworth. Blisworth itself is already a traffic black spot at the two-way junction of Stoke Road, High Street, and the Northampton Road with a 3-tonne limit on a stretch of Stoke Road alongside the canal. Knock Lane from Blisworth to Roade is a minor country lane with very narrow stretches. Least suitable of all is the Showsley Road, an unadopted single track country lane leading from Shutlanger to the A43 and can be expected to generate significant traffic from people leaving the A43, driving through Shutlanger and into Area 51. There is almost no public transport in the area and access on foot to Towcester is at least one hour's walk over country footpaths or along the A5 with very high volumes of traffic and air pollution for pedestrians to endure. The A5 is already overloaded with commuter traffic heading into Milton Keynes in the morning and seeking to go into, or through, Towcester in the evenings. The A43 bypassing Towcester is at a standstill approaching the Abthorpe and Tove Valley roundabouts every weekday afternoon, and this is before the additional traffic associated with the giant DHL depot north of Towcester. The A508 is similarly overloaded with tailbacks to the Cosgrove junctions during the working week, seeking to converge with the A5 at the Old Stratford

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junction. People living in area 51 will have no possibility of an acceptable commute by car to the local large population centres, or the rail stations at Northampton and in the Milton Keynes area. Residents of area 51 will be getting into their cars to go to work as there has been no growth in local employment in the Towcester area, with most of the light industry once based there already replaced by housing. The DHL depot is unlikely to generate local employment but instead see shift and zero hours contract workers commuting into Towcester. The other public amenities in the Towcester area are already overstretched. The sewerage works near Cappenhamb Bridge routinely discharges raw sewerage into the River Tove as a result of the hundreds of new houses built in Towcester with thousands more already being built. Both GP surgeries in Towcester report being completely overwhelmed by the number of new patients seeking to register there. Neither surgery has space to expand. Residents of area 51 will be part of this unmet demand. It is a similar picture with schools. Sponne School is oversubscribed, and Elizabeth Woodville school can soon expect to be with the population growth in Roade as well as Grange Park and Wootton. While there has been an expansion of shopping amenities in Towcester, the large supermarkets are inaccessible. Tesco and Aldi are on branch roads off the A5 in Towcester with no signal-controlled access. The Waitrose is only accessible through very small suburban roads in Towcester, themselves complicated by a one-way system. We understand the need to identify land for housing however the former district of South Northamptonshire led the way in providing such land, as shown in the Grange Park, Wootton, and Towcester Grange developments. This planned transformation of Towcester into a medium sized town is not compatible with the nature of this area. Perhaps a more suitable period would be a 15-year plan. In this way the projected numbers could be re-assessed, and a more accurate and meaningful calculation / assessment made.

- **Silverstone Parish Council** - These must be treated as two separate sites. The inclusion of the historic and beautiful racecourse cannot be permitted. As well as destroying such a site any development on it will destroy the vista from Towcester town centre's hinterland, in particular the council owned Water meadows area of nature, beauty and leisure. It must be a goal to get the racecourse reinstated as such. The southern area, which will greatly swamp the town with unsustainable housing will be divorced from Towcester town by the Relief Road and encroach on Silverstone Parish. No development should be considered here until the current SUE is completed and matured and the employment picture confirmed. Should this development go ahead it would be vital to upgrade the Relief Road to a full Towcester Bypass but ensure that it is bridged in such a way not to divorce any new development from the rest of the town. The extra traffic must be assessed as the existing A43 and A5 are already at capacity and commercial developments in the local plan will cause further major traffic issues.
- **Syresham Parish Council** - Development at the racecourse location is not desirable, to protect the landscape and the historic conservation area. The

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only area that would be available for housing would be on the flood plain. Also, any further development around Towcester would impact on the character of the town and the current road infrastructure, which is already under intense pressure, particularly around the A5/A43. Commuters travelling between Towcester and Milton Keynes already suffer long tailbacks on the A5, with no alternative environmentally sustainable transport options.

- **Tiffield Parish Council** - The road network in the local area around Towcester is already beyond breaking point. We have repeatedly informed the County Council of traffic saturation and pollution problems, particularly at the A5 Saracen's Head crossing and Towcester High Street, which are regularly exacerbated by periodic closures of the M1 motorway and the resulting diversion of traffic into the Towcester area. It is a very strongly held view by local residents that the road network cannot carry its existing load and further local development will be catastrophic to their ability to go about day-to-day activities. Tiffield Parish Council would therefore like to see all proposed development around Towcester removed from the Strategic Plan.
- **Towcester Town Council** - Provide a comprehensive response which covers the following issues:
 - The weaknesses of Option 4b far outweigh any possible strengths.
 - Towcester has experienced significant growth over the last 30 years, most recently in the form of the Towcester South Sustainable Urban Extension. Within the current Local Plan, there are also significant allocations in place for largescale warehouse distribution centres and other mixed-use employment sites.
 - Towcester has a significant deficit in health service provision, public transport, secondary school places, and sports fields, including football fields with supporting infrastructure. There will also be a deficit in Leisure Centre facilities as current developments are constructed. The deficit in secondary school places will increase significantly, as new residents move to Towcester.
 - Key weakness of the existing planned SUE are set out in detail, including its remoteness for the town centre and the lack of S106 funding given the costs associated with the relief road. Both weaknesses identified in previous plans continue and are magnified within the current growth option for Towcester.
 - Option 4b would create an even larger-scale expansion of up to another 4,250 dwellings. These would be considerably detached from the town's core, making walking, and cycling to connect with the town centre unrealistic.
 - Existing town centre services couldn't cope with the scale of additional growth.
 - Option 4b would effectively create a new town, isolated from Towcester.
 - Option 4b would see large scale housing development very close to Paulerspury village and create a sense of coalescence with the hamlet of Pury End

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- National Highways have reported to Towcester Town Council that the Relief Road will be at capacity, without any diverted HGVs, by the time 2,750 houses are occupied. The A5 will also be close to capacity by the time the current Towcester SUE is completed.
- The relief road would need to be dualled to provide further capacity which would cut-off new housing developments, separating them even further from the town centre and its services.
- Option 4b will make safe walking and cycling to access services in an increasingly remote town centre, completely unfeasible.
- Building a significant number of additional houses in or close to Towcester will only exacerbate the issue of out commuting. Despite the move to homeworking since the pandemic, commuting continues to create congestion, pollution, and delays on local roads, including the A43 and A5.
- The Town Council agrees with the assessment that ancient woodland, wildlife sites, the Grafton Way and other existing public footpaths and bridleways would be adversely affected by large scale development within Option 4b.
- Given other proposals within the Strategic Plan for warehouse and distribution centres, in addition to major rail freight developments being constructed, traffic can be expected to grow significantly on both the A43 and A5, adding considerably to Towcester's traffic problems.
- There is concern that current developments are creating an increasing problem with flooding. Detailed comments provided regarding the River Tove.
- The area identified in Option 4b has significant weaknesses in relation to surface water
- As Option 4b identifies, further expansion of Towcester to the west and south would have a considerable adverse impact on long-distance views towards the town, creating an urban landscape.
- Towcester Town Council welcomes the opportunity to engage with West Northamptonshire Council to discuss options for growth that offer more sustainable development for the town, with options that contain far fewer weaknesses and many more strengths.
- Development of the racecourse presents major challenges, as it sits within a Grade II* registered park and garden, that includes a Grade I listed building. Anything other than small-scale development would, as WNC's report states, impact upon the setting of the Towcester and Easton Neston conservation areas, as well as other listed buildings.
- Detailed comments made regarding the sustainability of the racecourse and the suitability of alternative uses.
- **Wappenham Parish Council** - Option 4B looks just like someone has taken a map and decided that since Towcester South has already had some development let's just make the arc bigger and throw a further 4250 houses in there. This is by far one of the worst suggestions in the whole Spatial Plan. Reasons include: The Racecourse Historic Listed Parkland, Will run off go to River Tove and up in Cosgrove River Great Ouse?, Effects on the A5,

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Towcester Relief Road splits the first and second extensions, effects on the village of Whittlebury, A43 is congested between Tove (Tesco) and Abthorpe (McDonalds) roundabouts now let alone the impact of further housing, Towcester Relief Road will be an estate road Towcester will need dual carriageway probably along Cowpastures Lane?, A5 will need dual carriageway from Towcester to MK TRR will form two communities divided by the road, Towcester lacks sufficient facilities now, buses, health, etc – cannot take more.

- **Whittlebury Parish Council** - The Towcester Racecourse is historic, registered parkland. The Council is aware of this, and the authors have stated that this would be difficult to develop and attracting a lot of opposition from heritage bodies. There is potential for further growth around Towcester, but the size of the proposed option 4b Towcester Southern Extension to the existing Southern Extension seems excessive. The Towcester Relief Road would simply become an estate service road and give no relief to Towcester at all. If it were expanded to a full dual carriageway, it would split the development and thus contradict Objective 9 of this plan. The spatial plan does not give any indication of the volume of traffic generated and its effect on the A43, A5 or other local roads, which are at capacity now. Such a massive second Towcester extension would overload the existing road infrastructure and would require the upgrade of the A5 from the A43 down to the Stony Stratford roundabout to a full dual carriageway. It would also put a significant strain on other local facilities which are already struggling to cope with the current Towcester SUE build-out. The proposals in north west Milton Keynes / Old Stratford need to be thought about in relation to this. The area would be bookended with two allocations totalling 10,500 homes with a massive impact on the local roads.
- **Wicken Parish Council** - The concern is that any new development on that site would create even greater problems on an already overcrowded A5 southbound toward Milton Keynes.
- **Yardley Gobion Parish Council** - No - Towcester Racecourse is historic registered parkland. The council are aware of this and the authors have stated that this would be difficult to develop and have a lot of opposition from heritage bodies. The Towcester Southern Extension to the existing Southern Extension is excessive. The Towcester Relief Road would then be an estate service road and give no relief to Towcester at all. If it were expanded to a full dual carriageway it would split the development and thus contradict Objective 9 of this plan. The spatial plan does not give any indication as to the traffic generated and its effect on the A43, A5 or other local roads. These are at capacity now. This extra extension would need to have a hard boundary with a full dual carriageway from the A43 to the A5 at Milton Keynes. The proposals in North West Milton Keynes / Old Stratford need to be thought about in relation to this. The area would be bookended with two allocations totalling 10,500 homes and no mention of the combined effect on the local roads.

The following Parish and Town Councils did not specify 'yes' or 'no':

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- **Cold Higham Parish Council** - Towcester is already a nightmare for traffic at times, and something would need to be done to alleviate this in advance of any further development. It must be recognised that the A5 is a very important highway to those living north of Towcester as well as those living in the town
- **Deanshanger Parish Council** - The proposals in Northwest Milton Keynes (5b) need to be considered alongside this proposal. The whole area would be bookended with two allocations totalling 10,500 homes with no mention of the combined effect on the local roads or any solutions proposed.
- **Evenley Parish Council** – Yes and no subject to caveats previously expressed about infrastructure provision. Strongly object to the proposal to develop the racecourse site, as this would lead to a very unfortunate precedent that in WNC, grade II* registered parks and gardens are available for housing development.
- **Hinton-in-the Hedges Parish Meeting** – see response to Q23 - plus everything has a 'potential' – the question is whether it is morally right to do it – do the council taxpayers already there want it?
- **Kislingbury Parish Council** - declines to 'vote' for particular options
- **Little Houghton Parish Council** - LHPC finds it difficult to agree with further expansion of the towns into rural areas without understanding the impact on heritage assets, conservation areas and existing infrastructure - in particular the highways network. Building on the flood plain MUST be avoided. The potential for using brownfield sites and underused town centre buildings for both housing and employment should be urgently assessed, together with an exploration of the identified constraints. Sites already identified within the JCS should be progressed before further land is allocated for development.
- **Milton Malsor Parish Council** - As a general point, the large developments at Towcester are not supported by sufficient facilities, particularly in the old centre, where the limited number of shops and parking spaces are inadequate for the enlarged town. Increased traffic to the larger centre of Northampton is inevitable, and much of it may use the former A43 through Blisworth and Milton Malsor
- **Weedon Parish Council** - This seems to be already taking place but there is a need for better transport options for those who cannot drive/cycle or walk to get to town centre services. The southern relief road is much needed to 'contain' the town.
- **Wootton Parish Council** - Additional information required

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Question 26: Do you agree that new settlements have a potential role in delivering growth as part of the spatial strategy for West Northamptonshire?

- 202 respondents said 'Yes'
- 326 respondents said 'No'
- 364 respondents provided specific comments

Those who agreed that new settlements have a potential role made the following key points:

- New settlements are appropriate given plan housing requirements and period.
- Only in a limited capacity, not the 5,000 homes mentioned.
- Forward planning will be required; national policy states a vision for at least 30 years ahead.
- New settlements could relieve the pressure on villages and towns. Consider locations that offer good transport routes to Northampton and other towns. Houlton and Grange Park are possible models.
- At some point new settlements will be a must; use them now to lessen impacts on existing infrastructure and allow growth beyond 2050.
- Concerned about loss of farming land (high grade agricultural land).
- Consult all residents.
- Depends on the size, type, and scale of the development.
- Support new settlement but query where would be an appropriate location.
- Support new town that has its own green electricity, access to green space, near good major roads with a purpose-built internal road network.
- Identify more sites for new settlements; see Houghton in Rugby as example.
- Only if done well in locations which are not detrimental to local residents/areas.
- Several hamlets in the area have few features; development would provide a service structure that is currently lacking.
- Need green belt around them to create sense of community and heritage appeal. Should not be sprawl to Milton Keynes or impact historic village life.
- Urban extensions are inappropriate; increasingly hard to integrate development into the urban fringes, particularly for bus routes. Sceptical about significant sustainable growth at Northampton, Daventry, Towcester and Brackley being achievable.
- Some respondents outlined the advantages of new settlements including a lesser impact on existing infrastructure and roads within towns and villages compared with urban extensions; being planned in a more holistic way than piecemeal growth of settlements; ability to build-in sustainability measures and place making from the outset; assisting with delivery where options for urban extensions are limited; can be placed where communications are good requiring less new infrastructure and at distance from existing settlements, causing less disruption; providing new facilities and services (schools, recreation and retail) and improved transport options.

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- Some respondents stated employment and residential uses should be developed alongside each other; only develop mixed new settlements (consider knowledge hub to support the Arc).
- Some respondents stated that without the criteria to assess the suitability of sites as new settlements the rationale for the two sites is unclear. New settlements need vision and commitment- not just a means of meeting housing targets. Should consider changing employment patterns and to meet climate change challenges; home working and reducing car usage do not seem compatible with the new settlement options.
- Some respondents stated that new settlements need planning specifically for the vision of the whole area – this is lacking in the document. Artificially planned new settlements are ripe for deprivation without employment in sectors which people want to work in.
- Several respondents agreed but only if they are separate new settlements and not attached to existing communities/settlements, or they do not result in the merging of existing communities/settlements. Current plans risk losing village identities/overwhelming the rural areas.
- Several respondents agreed but only if new settlements have sufficient infrastructure including transport, with road upgrades/public transport links/cycle ways (need to consider impacts on traffic flows); schools; green space; health/community centres; emergency services; car parking. These should be provided up front and enable them to be self-sufficient so there is no impact or additional pressure on existing infrastructure/services in nearby settlements.
- Several respondents stated the Council should await the publication of the AECOM new settlement report. Concerned that options/potential locations have been identified/selected prior to the evidence.
- Several respondents agreed but stated that the options proposed in the plan are not new settlements; they represent urban extensions to existing settlements. Reference made to examples of Mawsley and Moulton of models to be considered (build new settlements with their own character).

The following comments were made regarding the specific site options and new suggested sites/locations:

- Consider transit-oriented development (new and expanded smaller settlements alongside potential new public transport routes). Refers to specific corridors: A45 west of Northampton and the M1 including Weedon and Flore; north of Daventry on the A361 towards Kilsby; A43 west of Towcester and related to the Silverstone and Silverstone Park area; the A422 between Brackley and Banbury, including Fathinhoe and Middleton Cheney; the A5 north of Old Stratford; the A508 south of Roade; between Daventry and Banbury on the A361; the A428 between Northampton and Crick.
- These areas have key transport links both roads and rail which aid economic and residential development; would allow local communities to be sustainable.
- Area south of Towcester the A5/A508 and A422 road networks cannot accommodate further traffic movements as they are already over committed.

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- Arm Farm site development could support improvements to the A43 (e.g., express bus service) and a potential new railway station on the West Coast Main Line.
- HSGV can deliver a significant number of dwellings (over 5,000). Awaiting publication of the AECOM new settlements study before commenting further.
- HS2 through Brackley; consider new station/town on scale of Milton Keynes.
- Land to the South of the A14 Junction 2 for should be included for Strategic Development, including Harrington Airfield site and the Kelmarsh Estate Land site (supporting information provided).
- Land to the South East of Towcester (Site Ref. 54) is available and suitable for a new settlement. Query Strategic Land Availability Assessment analysis to date.
- Long Buckby: support for the proposal, but as new settlements have significant lead-in times and infrastructure requirements parts of the proposed allocation should be allowed as standalone developments and/or allow smaller scale developments in the rural area/villages e.g., Long Buckby; West Haddon; Land at Station Road, north of Long Buckby (part of new settlement).
- Long Buckby: support for the site. Support for the location with access to the railway station and the quieter sections of the A5. It's a suitable, deliverable, and developable site. Consider delivery issues at existing towns e.g., 5,000 homes already allocated at Daventry.
- Long Buckby: object to the site. It is not suitable- query emphasis on this site.
- Spatial Option 1a has far more weaknesses than strengths.
- Spatial Option 5: Would have a significant impact on police and fire operations (Long Buckby fire stations and Daventry police station). Information is being sought on the capacity within these facilities.
- Spatial Option 5a: object to the site. It is not a new settlement (is an extension to Long Buckby); needs significant infrastructure before expansion, but do not understand how and where such infrastructure would fit in the area.
- Spatial Option 5b/Milton Keynes North West: object to the site. Concerns regarding the A5; traffic congestion; not a new settlement as it would merge a number of villages into a single conurbation without adequate services or infrastructure; needs significant infrastructure before expansion but do not understand how and where such infrastructure would fit in the area; roads and access need to go in first and services need to be planned from the outset.
- Spatial Option 5b/Milton Keynes North West: support for the site. Is a suitable site for a new settlement; significant growth around Northampton is likely to be constrained. Infrastructure can easily accommodate this development.

Those who disagreed that new settlements have a potential role made the following key points:

- Patterns of employment and behaviours need to be radically altered to meet climate change challenges before 2030. The plan lacks any deep analysis of these factors, so the need for new settlements is questionable.
- Too much green space is surrendered to development in new settlements.

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- Potential for new settlements but would need to be in the context of garden city ideas or zero carbon options.
- Need accurate information before putting forward the plan. Trains running from the stations are normally the slow ones.
- Contravenes Spatial Objectives 2 (Green Infrastructure and Natural Capital), 3 (Landscape), 15 (Rural Diversification and Employment). However, the use of suitable “Brownfield” sites for new settlements may be appropriate.
- New settlements will only attract persons from outside the county and do nothing to relieve internal matters.
- The Housing and Economic Needs Assessment shows that the future population growth will be almost entirely in the over 60s age group. The need to move into more sheltered accommodation falls much later in life due to healthcare progress. Illogical to create new settlements away from existing residential centres where health care is readily available.
- Artificial growth development leads to social and economic problems; growth should develop organically.
- There is no real clarity on what is meant by new settlements.
- Building new settlements is not a sustainable way for growth; Northamptonshire already has several significant satellite towns for its size.
- Would only support a new settlement if a sound need has been proven; do not consider this is the case with the existing housing numbers.
- Only build new towns if needed for West Northants housing requirements.
- Lack of benefits for existing residents.
- Ensure proposed developments are the correct type of dwellings and accessible by the people that need them most.
- Government policy is for a levelling of the country; if new settlements are needed, they should be in less well-off regions.
- Concerned with focus on economic growth; quality of life is what matters.
- Failure to comprehensively assess new settlements within the spatial options is a fundamental omission; question the ability to bring forward sites through the Sustainability Appraisal with appropriate ranking of Options.
- Milton Keynes is an example of successful new settlement; but do not believe a new settlement location could be identified in West Northants with similarly good road and rail links and located sufficiently far from existing towns.
- New settlements need vision and commitment, not just a means of meeting housing targets.
- Some respondents stated that new settlements require significant front-loaded infrastructure and have long lead in times for delivery. Would deliver limited housing numbers over the plan period. More effective housing delivery will be achieved through sustainable urban extensions.
- Some respondents stated that the current proposals are confusing and/or there was not enough information available at present.
- Some respondents stated the Council should await publication of the AECOM new settlements study and the Oxford-Cambridge Arc strategy.

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- Some respondents stated the large-scale new settlements would adversely change the rural character of the area, including smaller towns and villages.
- Some respondents stated that the options did not represent new settlements; they are extensions to existing settlements.
- Some respondents stated that further engagement/consultation with residents on plans for growth was needed.
- Some respondents stated there was a risk of ribbon development.
- Some respondents stated that the council should have a set of criteria for any new settlement to assess its suitability. Potential sites need to be judged against that criteria; without this it is difficult to understand the rationale for the two sites.
- Some respondents queried the ability of the new settlement options to meet the climate change challenges, including creating and/or reflect new patterns of home and working life.
- Some respondents stated that the most appropriate housing strategy is combination of options; further growth to be achieved via growth at the market towns (larger strategic scale development) supplemented by small to medium scale developments in the rural area.
- Several respondents stated that new settlements result in losses of farmland, biodiversity, green spaces (that help reduce climate change and contribute to the character of the area).
- Several respondents stated that housing/investment should instead be directed to existing settlements (incremental growth or modest extensions to existing villages/towns) instead of new settlements - preferably on brownfield land. Increase densities and reuse empty houses/ existing office/retail vacant space (reference made to Northampton and the villages). Improve existing services/facilities at the same time and maintain community 'feel'.
- Several respondents stated that new settlements should not engulf/merge existing rural villages/communities/nearby urban areas (including Milton Keynes). Would be in direct conflict with the objective of preserving rural identity. Should be situated far enough away from other communities.
- Several respondents expressed the view that there had already been too much/enough development in the area with pressure on existing infrastructure/services, environmental impacts, and loss of character.
- Several respondents expressed concerns with impacts upon existing infrastructure and the need for any new development to be accompanied by supporting infrastructure up front (existing infrastructure is already under pressure). Some respondents expressed support for new settlements if they could be supported by appropriate infrastructure; were located nearby railways; were in proportion to existing settlements; minimised out-commuting.
- Several respondents expressed concerns with the adverse impacts of new settlements, including increased commuting (e.g., Mawsley is remote); increased traffic; located too far from towns; increased pollution; lack of community; lack of affordable housing. Lack of a mix of uses means they are not sustainable developments.

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- Several respondents stated that the proposed new settlements were disproportionate to the local areas/excessive in scale.

The following comments were made regarding the specific site options and new suggested sites/locations:

- A5 (north and south of Towcester): several respondents expressed concerns with development in this area as it is incapable of supporting further traffic; will make it impossible for people in Towcester to get to Milton Keynes; A5 is already struggling to manage the increasing traffic from the Towcester development (road is constantly requiring repairs).
- Buckton Fields (Boughton): should be reconsidered as Northampton has grown considerably over the last 20 years. Roads and services already at capacity. No new development should be considered until the Northern Orbital Road and improved connection to the M1 are completed. Concerns regarding impacts of commuting traffic on nearby settlements (noise, pollution, and pedestrian safety).
- Ecton (specifically sites 38, 39 and 40): some respondents expressed concerns including that the sites lie outside West Northamptonshire and are not suitable/appropriate for development. Concerns regarding coalescence with Northampton.
- Spatial Option 5a- Long Buckby: several respondents expressed concerns including that it is not a new settlement but an expansion of Long Buckby (existing villages need to expand slowly so new infrastructure can be accommodated over time); the Victorian railway bridge would need to be enlarged; Long Buckby would lose its village/rural feel and identity; existing infrastructure is not suitable/would not be able to cope (road network, drainage, schools); location is in Flood Zone 3; the conservation area will be adversely impacted; would join with the extension of North East Daventry by the A5 (already a poor junction); risks turning Long Buckby into a suburb of Daventry.
- Spatial Option 5b - Milton Keynes North West/Old Stratford: several respondents expressed concerns including coalescence with Potterspury and/or Deanshanger; creates an artificial community; creates a dormitory suburb for Milton Keynes; merges a number of villages into a massive conurbation without adequate services and infrastructure (is not a new settlement); would cut off villages such as Yardley Gobion and Potterspury from the centres of Wolverton and Stony Stratford; existing infrastructure would be unable to cope (roads, water, sewage); out of proportion to existing villages, would be 150% the existing size of all of these villages (would lose individual identity); the A5 is already over used; noise, light and air quality along the A5 is already excessive; use of the A5 as a cycleway or footpath is impractical/unpleasant- inappropriate for it to dissect a new community (unsafe to cross); road safety concerns; the Old Stratford roundabout already struggles to function during busy period; concerns about where the new access roads would be located and impacts upon road safety/traffic (including on the A5, A442, A508); new cycleways and footpaths connecting villages to

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Towcester or Stony Stratford would be unacceptably busy; results in loss of countryside and wildlife; results in loss of listed buildings (and non-listed assets) destroying the context in which many were built; A422 and A508 boundaries mean that the housing stock would be unnecessarily dense; Milton Keynes development should remain south of the A5/A508 roundabout to protect countryside; poultry unit on the lane towards Puxley does not fit well with residential development; Shrop Spinney and Ash Pole spinney need to be protected; land to the east of the A5 and north of the A508 lies below the level of those roads- housing would suffer traffic noise and overlooking; concerned about reality of the potential rapid transport system connections; adverse impact of new retail provision upon existing stores in Stony Stratford.

- Towcester should not be further extended, making a historic rural town a polluted large town/small city (destroying the character and wildlife). Road network is not fit for purpose, even with the relief road.

Other comments made by respondents who did not specify ‘yes’ or ‘no’:

- Should be a new settlement, not added onto existing communities.
- There would be no impacts on Buckinghamshire from the Long Buckby option due to distance.
- Not enough information to comment on the role of new settlements currently. Question whether new settlements can deliver sustainable development even when located close to a railway line. Rail travel has limitations regarding how convenient it is in relation to places of work.
- There is a role for existing settlements to deliver sustainable growth, but this is different to the proposals at Long Buckby or at Old Stratford.
- New settlements create growth but can also create ribbon developments that join up existing communities and add to congestion, environmental impact, and flooding.
- Why is growth from an adjacent authority being considered (Milton Keynes)?
- New settlements can create a well-planned community, but they can also destroy an area’s local character. Expand existing communities where possible instead.
- There is a role for existing settlements to deliver sustainable growth, but the large-scale development will be costly to achieve.
- Only in urban areas, realising Northampton’s infrastructure and resources.
- Take account of the concerns of those with genuine knowledge of the local area and existing communities.
- Support focusing residential building in one area; would provide homes for those who come to the area to work on the employment sites.
- The AECOM new settlement study should reassess the potential of Land at Kilsby for a new settlement. Additional land parcels have been brought together to deliver a larger site with 3,300 - 4,000 new homes, a 10ha business park, open space, community and education facility, local retail facilities, a new junction on the M45 and the potential to fund sustainable transport routes which link the site with Rugby, Daventry and DIRFT.
- Query how sustainable the approach is.

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- Concerned about loss of green spaces and a new settlement should be far enough from other communities so they are not overwhelmed/ merged.
- Patterns of employment and travel behaviours need to be radically altered to meet climate change challenges before 2030; there is no analysis of this.
- Only appropriate if well designed and integrated into existing society and infrastructure.
- Need to demonstrate how new settlements will contribute to the overall spatial policy for West Northamptonshire.
- Potentially in an area close to the Oxford / Cambridge Arc.
- Failure to comprehensively assess new settlements within the spatial options is a fundamental omission; question the ability to bring forward sites through the Sustainability Appraisal with appropriate ranking of Options.
- Proposal not fully investigated so it's not appropriate to comment at this stage, however, there are likely to be more suitable sites than those consulted upon.
- Direct development and investment to existing towns to improve their services, rather than making villages into towns who do not have the facilities.
- New settlements may be appropriate if suitable sites can be found.
- New settlements avoid overwhelming existing settlements and are free of the constraints of existing development patterns.
- New settlements can accommodate growth, subject to infrastructure and funding (requires government investment and non-private sector housing delivery). However, a strategy of new settlements and large-scale urban expansion gives rise to housing delivery concerns. Consider how housing and economic growth can integrate with existing urban development and contribute towards other key spatial objectives e.g., Spatial Option 5a appears to be considered due to its relationship to a railway, rather than its ability to contribute positively to policy objectives. Consider strategic growth via additional sites at a range of existing settlements that have infrastructure and relationships with higher order settlements and can deliver in the Plan period.
- Several respondents stated the option of a new settlement(s) is a valid one. However, should await publication of the AECOM study which may identify other sites that are more suitable than the two consulted upon. Other new settlement proposals have been promoted but have been dropped without reasons e.g., south of Northampton; all the possible options should have been consulted on. New settlements should be distinct (existing settlements should not be merged into it). There should be criteria for any new settlement to assess its suitability. Potential sites need to be judged against that criteria; without this it is difficult to understand the rationale for the two sites.
- Several respondents stated that all infrastructure (including that which helps achieve carbon neutral status) must be considered and planned beforehand/provided at the outset (this can be an advantage of new settlements). Details on the infrastructure projects required are not included; should be provided and should guarantee delivery (no infrastructure to be lost at a later stage due to viability).
- Several respondents urged caution with reliance upon a new settlement's delivery to meet the overall quantum of housing and economic growth

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necessary, particularly in the first half of the Plan period and if development requirements are increased to account for the Oxford Cambridge Arc. New settlements are difficult to deliver and require significant planning and infrastructure delivery prior to first development. The plan should allocate such sites above and beyond those required for development needs. Can be kept under review via Local Plan Reviews. Given lead in times, it is unlikely any development will be forthcoming on new settlements until the latter end of the Plan period; however, could provide supply in the long term. Reference to 'Start to Finish' (Nathaniel Lichfield's) report.

- A number of comments already expressed in relation to specific sites/locations above were repeated here. See above comments regarding Spatial Option 5b; sites 38, 39 and 40.

Parish/Town Council responses:

The following Parish and Town Councils agreed that new settlements have a potential role:

- **A5 Alliance of Parish Councils** - New settlement options should be held back until the AECOM study is published. Difficult to understand how two new settlements have appeared in this options consultation. Should have a set of criteria for any new settlement to assess its suitability. Any potential sites need to be judged against those criteria, in the absence of this it is difficult to understand the rationale for the two sites consulted on. New settlements are not just a means of meeting housing targets. The concept of new settlements should be reconsidered in the light of changing employment patterns and to meet climate change challenges. Home working and the need to reduce car usage do not seem compatible with new settlement options that are nowhere near employment locations. A new settlement needs to be distinct and not allow for existing settlements to be merged into it. Option 5b merges several villages (Deanshanger, Old Stratford, Potterspury and Cosgrove) into a single conurbation that is dissected by the A5, without adequate services or infrastructure (6,000 new houses would be 150% the existing size of these villages). Does not protect the rural areas or deliver a new settlement. Option (5b) is not thought through or planned. Roads, access, and public transport need to go in first. Services need to be planned from the outset. The transport solution seems linked to a proposition by Milton Keynes Council that is not confirmed, budgeted for, and has no clear timescales.
- **Brixworth PC** - Need careful siting with a fully worked up technical assessment to understand infrastructure needs. Infrastructure needs not to be limited to roads, cycleways, and footpaths, but to the wider interpretation.
- **Cogenhoe and Whiston PC** - As long as the infrastructure is in place first to support the developments
- **Daventry Town Council** - New settlements are beneficial if they are developed using technology to reduce the carbon footprint and are sympathetic with nearby neighbourhoods and landscape
- **Kingsthorpe PC** - Provided they are sited in appropriate locations.

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- **Little Houghton PC** - The village of Mawsley in North Northamptonshire and Wixhams in Bedfordshire are good examples of creating new settlements.
- **Long Buckby PC** - Well-planned new settlements provide the best opportunity to deliver the maximum number of plan objectives.
- **Nether Heyford PC** - Only where they are genuinely new stand-alone settlements with all relevant infrastructure and facilities, not annexes to existing settlements.
- **Old Parish Council** - Subject to full study.
- **Overstone PC** - A new settlement similar to Mawsley straddling the Lilbourne/Yelvertoft border of about 10,000 new homes plus. Creating a new Parish could fulfil a third of the housing needs of 30,000. Would also address new housing in rural area. This area has good road links so requires limited highway infrastructure; could concentrate on other infrastructure such as schools, health centre etc. Ensure infrastructure is built prior to the houses.
- **Silverstone PC** - New settlements should be far enough away from existing settlements to avoid perceived coalescence.
- **Walgrave PC** - There are no objections to new settlements such as Mawsley, but full consideration should be given to road infrastructures, the effect on highways to other local environments and other infrastructure such as schools, health centre and other facilities. Ensure infrastructure is built prior to the houses.
- **Whittlebury PC** - A new settlement needs to be distinct and not merge into existing settlements. Should have clear criteria for any new settlement to assess its suitability. Any potential sites need to be judged against those criteria. New settlements must have good public transport, road, and rail links, together with other infrastructure and investment in local services/facilities.
- **Woodford-cum-Membris PC** (no comments)

The following Parish and Town Councils disagreed that new settlements have a potential role:

- **Blisworth PC** - Development should be centred around centres of existing urban density to allow for the support of communities.
- **Cosgrove PC** - Some potential in theory, but the work of the plan advisers has yet to be completed and the current proposals are confusing. To decide on any new settlements at this stage without the plans conclusions appears folly. The Arc conclusions are not due to be published until mid-2022 at the earliest.
- **Culworth PC** (no comments)
- **Hinton-in-the-Hedges PM** - Ruining greenfield land should never be an option. There would have to be an extraordinary strong case for brand new developments and at present the case is very weak.
- **Old Stratford PC** - Some potential in theory, but the work of the plan advisers has yet to be completed and the current proposals are confusing. To decide on any new settlements at this stage without the plans conclusions appears folly. The Arc conclusions are not due to be published until mid-2022 at the earliest.

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- **Potterspury PC** - They could perhaps play a role if properly thought-out new developments in appropriate locations with good sustainable transport links. Unfortunately, the suggested sites are not.
- **Syresham PC:** - The impact on the landscape and natural habitats would be devastating. Should protect the space nature needs. Major new development should be kept to larger centres, where there is infrastructure and the potential for public transport.
- **Tiffield PC** - No, we do not agree with this statement. The HENA very clearly shows that the future population growth of the county will be almost entirely in the over 60s age group. Progress in health care has allowed more and more retired people to continue to live in their family homes well into their retirement. The need to move into more sheltered accommodation now falls much later in life. It therefore is illogical to create new settlements away from existing residential centres where health care is readily available. The potential to create new settlements is also seen as antagonistic to the local electorate where protest groups such as CPRE and 'Save our Village Landscapes' present a more sustainable view of the future.
- **Wicken PC** - Any new settlement would need to be situated sufficiently far from other communities so that they are not overwhelmed. Patterns of employment and behaviours need to be radically altered to meet climate change challenges before 2030. The paper lacks any deep analysis of these factors. The need for new settlements is therefore questionable.

The following Parish and Town Councils did not specify 'yes' or 'no':

- **Blakesley PC** - The option of new settlements is a valid one. It has the advantage, in theory, of having all the necessary services and infrastructure planned from the outset. The AECOM study may identify other sites in the area that are more suitable than the two consulted upon. A new settlement needs to be distinct and not allow for existing settlements to be merged into it. Should have a set of criteria for any new settlement to assess its suitability. Any potential sites need to be judged against those criteria; without this it is difficult to understand the rationale for the two sites.
- **Cold Higham PC** - In principle they might play a part, as might other areas, but need more information.
- **Deanshanger PC** - New settlement options should be held back until the AECOM new settlement report is published. A new settlement needs to be distinct and not allow for existing settlements to be merged into it. Option 5b merges several villages (Deanshanger, Old Stratford, Potterspury and Cosgrove) into a single conurbation that is dissected by the A5, without adequate services or infrastructure (6,000 new houses would be 150% the existing size of these villages). Does not protect the rural areas or deliver a new settlement. Should have a set of criteria for any new settlement to assess its suitability. Any potential sites need to be judged against those criteria; without this it is difficult to understand the rationale for the two sites. Option (5b) is not thought through or planned. Roads, access, and public transport need to go in first. Services need to be planned from the outset.

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The transport solution seems linked to a proposition by Milton Keynes Council that is not confirmed, budgeted for, and has no clear timescales.

- **Evenley PC** - Yes & No. Agree that this merits further study.
- **Greens Norton PC** - The option of new settlements is a valid one. It has the advantage, in theory, of having all the necessary services and infrastructure planned from the outset. The AECOM study may identify other sites in the area that are more suitable than the two consulted upon. A new settlement needs to be distinct and not allow for existing settlements to be merged into it. Should have a set of criteria for any new settlement to assess its suitability. Any potential sites need to be judged against those criteria; without this it is difficult to understand the rationale for the two sites.
- **Kislingbury PC** – declines to vote for particular options.
- **Weedon PC** - Possible role but only if done with the involvement of communities. New development at Long Buckby has been over promoted recently by Daventry District Council; plans were over ambitious and have caused damage to the village e.g., disruption by lorries and commuter parking. The station is an asset, but its development has caused problems. Against the character of Long Buckby village and wharf being destroyed; this is a risk if residents are not involved in planning developments.
- **Wootton PC** - In theory they have a role, but detailed information is required to comment.
- **Yardley Gobion PC** -The option of new settlements is a valid one. It has the advantage, in theory, of having all the necessary services and infrastructure planned from the outset. The AECOM study may identify other sites that are more suitable than the two consulted upon. Other new settlement proposals have been dropped without giving any reasons e.g., garden village south of Northampton; all the possible options should have been consulted on. A new settlement needs to be distinct and not allow for existing settlements to be merged into it. Should have a set of criteria for any new settlement to assess its suitability. Any potential sites need to be judged against those criteria; without this it is difficult to understand the rationale for the two sites. Site 5b cannot be considered a new settlement as it would effectively merge several villages into a single conurbation without adequate services or infrastructure.

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Question 27: Do you agree that spatial option 5a – Land to south of Long Buckby - has the potential to support a new settlement?

- 207 respondents said “yes”
- 415 respondents said “no”
- 490 respondents provided specific comments

Those who supported spatial option 5a – Land to the south of Long Buckby raised the following key points:

- Proposal is the most appropriate strategy for sustainable development in West Northamptonshire and could provide a significant element of the future housing need. It is consistent with national planning policy and Strategic Plan vision and objectives. New settlement would be deliverable and developable over the Plan period to 2050.
- New homes are needed for people wanting to stay in the local area. Could play an important role in development of Northamptonshire particularly if it integrated housing and employment and would benefit from properly planned green housing and social spaces.
- Scale of settlement would deliver environmental improvements, sustainability, and biodiversity net gains. It could also deliver an all-through school including 6th form, employment opportunities and neighbourhood centre and be capable of linking to Long Buckby Village, Daventry, and Northampton via sustainable modes. Could work if facilities and infrastructure are provided by developer contributions.
- The station has a relatively frequent service to Birmingham, London, and Northampton. Station is underutilised and provides opportunities for sustainable transport and connections to nearby towns and cities. Concept should be focussed on walking access to the station using a radius of 1000m.
- Opportunity might exist south of railway line to provide new bus spine road linking to A5 and Churchfields expansion at Daventry. Combined demands of sites between Daventry and Long Buckby could support a suggested 20-minute service between Daventry and Long Buckby, thereby linking Daventry to national rail services.
- There are good road connections to the M1 and A5, easy access to Daventry for employment and leisure and DIRFT, Rugby and Coventry. It is better for commuters and better located to serve the needs of West Northants than Milton Keynes as it is closer to Daventry and Northampton.
- Traffic congestion issues on A5 is not as severe as for option 5b. Potential to create better links with the existing trunk road system. Further work is necessary to determine the required off-site highway and infrastructure works.
- Finger of land south of the railway should be excluded due to potential conflict with the commercial and agricultural uses.
- The physical separation from the existing village centre is sufficient to ensure no adverse impact on the conservation area.
- If site is allocated, master planning should investigate opportunities to expand facilities at football and rugby clubs to accommodate demand.

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Those who objected spatial option 5a – Land to the south of Long Buckby raised the following key points:

- This is not really a new settlement, it's an urban extension which would increase the size of Long Buckby disproportionately, to the extent that it is no longer a village. Residents choose to live in Long Buckby because it is a village not a town. It would lead to loss of the setting, character, and identity of Long Buckby and Long Buckby Wharf. There may be potential for small scale expansion. May be potential for strategic scale development at Long Buckby, which should either be a true expansion rather than a new settlement. Development should not extend south of the railway line. 4000 new dwellings are planned at Daventry, this option would lead to coalescence with Long Buckby.
- Would be better to expand existing developments in Daventry, improve services there and provide better public transport to Long Buckby station.
- Should be part of a proper growth strategy not just a large housing development. Would be better planned as a standalone village/town with its own service, facilities and infrastructure including a purpose-built railway station. Potential for this site to compete with Houlton at Rugby due to proximity.
- Existing highway infrastructure and access to Long Buckby is poor. Three Bridges Road is narrow and winding and is constrained by the railway and motorway bridges. It is very busy and gets congested at a number of bottlenecks by the bridges and at Long Buckby Wharf. Increased traffic would hugely exacerbate the problem. Road would need significant improvement including widening and possibly traffic lights which would be costly. Alternative access option via Watford is problematic. The A5 crossing is already dangerous, a large increase in traffic would make it more difficult to cross, necessitating a roundabout/traffic lights, a new access onto the A5 or a bypass. Need for effective cycling link between LB, LBW and Daventry. New development should be in areas with an existing major road system not historic village centres.
- Local roads in the village centre are historically narrow, congested, in poor condition and unsuitable for a large increase in traffic. Parking is limited, traffic causes vibration and damage to buildings. Increased traffic would increase problems and lead to more pollution and noise. Concerns about road safety and impact of traffic on the historic centre and conservation area.
- Existence of a railway station does not justify this scale of development or mean Long Buckby should be turned into a commuter town. The rail service is poor, the station is outdated, inaccessible and needs significant investment and improvement. Many station users are not residents and the station will not help resolve the highway issues. There is limited rail capacity, more passenger trains could impact on operation of DIRFT. Considerable cost to improve road access, it would be better to build a new platform elsewhere or open a new one, such as at Althorp or Market Harborough to Northampton.
- Although served by a railway station there is potential for car-based trips to impact on roads in Warwickshire. WCC keen to work jointly with WNC at an early

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- stage to agree modelling assumptions, methodology and scope of a strategic transport assessment.
- There are limited employment opportunities in the village, most residents out commute and this development would lead to more, thus adding to the traffic issues. New residents are likely to commute by car due to lack of suitable cycleways, leading to increased traffic and carbon footprint. New settlements have a role to play in delivering growth providing they are linked to a strategy for commercial growth which delivers employment opportunities. No such linkage here.
 - Long Buckby has had a lot of development and infrastructure is struggling to cope. There would need to be upgraded or new facilities, specifically GP surgery, schools, shops, library, community centres, police, and utilities. There is concern that new services/facilities will either not be provided early enough, or if the development was small it would have limited infrastructure or benefits, thus impacting further on existing services/facilities. It would significantly impact on fire and police resources.
 - Site is within flood zones 1 and 3, it regularly floods, flood mitigation would therefore be required. Modelling is required; however, it should not prevent the site from being developed. Level 1 and 2 SFRA may inform an FRA. Water companies will need to consider future growth considering capacity of sewerage network. Water cycle studies may be required/updated.
 - Loss of open countryside, green field agricultural land, natural habitats, trees, and impact on wildlife. There should be more focus on brownfield sites and regeneration of existing built-up areas. It is unsustainable and would negatively impact on climate change.
 - Design of a large new estate would be out of character with existing village.
 - Should wait for AECOM report to see if there is a better standalone settlement option, which would include a parkway station.
 - A significant number of new houses would reduce local house prices and new businesses on the development could negatively impact existing businesses. A large new estate built onto an existing community would lead to increase in crime and antisocial behaviour, particularly quickly built poor designed estates, which don't have any of their own amenities. New housing likely to attract people from cities rather than local people.

Parish / Town Council Responses

The following Parish and Town Councils supported spatial option 5a:

- **Cogenhoe and Whiston Parish Council** (no comments)
- **Cosgrove Parish Council** - This is a better option than 5b due to its location, road, and rail links. It is more closely aligned to objective 8 (connections).
- **Culworth Parish Council** (no comments)
- **Daventry Town Council** - Due to its proximity to the rail network, it could be developed as a low carbon community.
- **Old Parish Council** - Good option with proximity of rail links.

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- **Old Stratford Parish Council** - Better option than MK option, location, existing road, and rail links, more aligned with objective 8.
- **Potterspury Parish Council** - Has rail links and accords somewhat with objective 8.
- **Wappenham Parish Council** - Yes, close to A5 and M1 and has a railway station. Better than any option around Towcester. Better to serve Daventry and Northampton.
- **Woodford-cum-Membris Parish Council** - Need to consider local infrastructure and facilities before the housing. A local supermarket with parking would be beneficial.

The following Parish and Town Councils objected to spatial option 5a:

- **Blisworth Parish Council** (no comments)
- **Brington Parish Council** - Not an appropriate location for 5000 dwellings. Understand it's based on the presence of a railway station; however, this is a local service, not a hub and not appropriate for increased commuter use. Existing infrastructure would be unable to cope – roads, services/facilities, and utilities. No scope to improve highway or sewerage infrastructure. A5 junction is already problematic. Impact on surrounding roads of increased traffic.
- **Brixworth Parish Council** - AECOM report might reveal a better site. Existing railway station is an advantage, however, required highway improvements are complex. Would need a guarantee that highway issues would be addressed, otherwise option would be too large for Long Buckby to sustain.
- **Long Buckby Parish Council** - Objects in the strongest terms so it can be ruled out at an early stage. Representing views of Long Buckby community. A new settlement within West Northants should be carefully selected and underpinned by principles to make it successful. 5a does not fulfil these and is bound to fail. Lack of selection process, premature before new settlements study. Long Buckby has experienced significant growth as a primary service village, however, apart from a larger station car park and affordable housing there have been limited improvements to village infrastructure. Request that WNC undertakes a thorough review of infrastructure capacity before allocating additional land to the village. Council needs to appreciate development constraints and lack of opportunities to improve infrastructure and roads. Option unlikely to be viable due to highway constraints and distance from employment, cost of providing new road link. Most journeys would not be by public transport. Highway safety concerns. Village is close to capacity. Long Buckby PC has submitted a detailed response prepared by Land and Planning Consultants Ltd which includes the following conclusions:
 - WNC has yet to complete its study on new settlements and the publication of Option 5a within the Spatial Options Consultation document therefore is premature, lacks any careful site selection process based on any credible evidence and is thus contrary to

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- national guidance in the NPPF, causing unnecessary anxiety to Long Buckby residents
- Based on completions in Daventry town over the last 10 years, it is considered highly unlikely that a new settlement is viable at Long Buckby given it is severely constrained by poor road links and too far away from major economic centres.
 - Long Buckby is not a sufficiently sustainable location for a new settlement. Less than 5% of journeys would be made using public transport and the expert evidence finds that the vast majority of journeys would be via private car.
 - The same Tutum Consulting report commissioned by LBPC considers that a new road to the proposed new settlement would be necessary and ideally link the A428 with the A5. Given the constraints and need to cross the M1, Grand Union Canal and 2 railways; the cost of such a road would be financially prohibitive.
 - LBPC additionally have grave concerns over highway safety. Three Bridges Road has blind bends and is narrow in places and its junction with the A5 has a history of serious road traffic accidents.
 - Long Buckby is close to reaching its full environmental capacity following significant growth over the last 10 years. There are no solutions to improving roads or car parking within its already congested village centre. The development of 5000 homes would also cause substantial harm to the character and setting of Long Buckby/Long Buckby Wharf's heritage assets comprising 38 listed buildings, 2 conservation areas and a scheduled monument.
 - Option 5a is severely constrained by large areas of land being located within flood plain zone 3 and thus not developable. In addition, there is significant risk of such a vast development causing more areas to flood including the village of Whilton.
 - A cordon sanitaire around the sewage treatment works is a further constraint to the viability of a new settlement and the land necessary to make one sustainable.
 - There are significant other constraints to development such as archaeological heritage assets, landscape impact and ecology.
 - The weaknesses and constraints of Option 5a substantially outweigh any benefits and it is considered there are better, more financially viable and more sustainable locations for a new settlement. LBPC request that Option 5a is withdrawn as a new settlement forthwith.
- **Nether Heyford Parish Council** - Needs rethinking. If Long Buckby is seen as having growth potential it should have a fully thought out growth strategy.
 - **Ravensthorpe Parish Council** - Strongly oppose. Railway station is an advantage, however, roads in the centre and surroundings are inadequate for increase in traffic.
 - **Syresham Parish Council** - Size is too big, planners need to look at quantity and impact on infrastructure and how people will travel on an already struggling road network.

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- **Watford Parish Council** - Option is likely to result in traffic issues which will impact Watford. Village already suffers from high traffic volumes, speeding, peak time congestion and people using it as a through road to reach the A5 and M1 via the services. Village roads also used as an alternative access to the A5 when Three Bridges Road is shut. Likely that development would result in increased traffic during construction and when it's finished. Existing road infrastructure is inadequate, difficult, and hazardous junctions to the A5, height and width constraints of road and rail bridges and Three Bridges. Concerned that heavy construction traffic will use road through Watford.

The following Parish and Town Council did not specify 'yes' or 'no':

- **A5 Alliance of Parish Councils** – WNC should wait for the Aecom report. Of the two new settlements being promoted, this site is the better option, it is close to the M1 and A5 and has a railway station and is more aligned to Objective 8: Connections than the second site 5b at NW Milton Keynes. This site is better placed to serve the needs of West Northants being closer to Northampton and Daventry than 5b which would serve the needs of MK. However, this is not really a new settlement rather an extension to Long Buckby that will increase the town disproportionately. There will need to be consideration to mitigate the flooding aspects this proposal may give rise to. The local infrastructure must be upgraded prior to any proposed expansion.
- **Deanshanger Parish Council** - This is the better of the two new settlements being promoted.
- **Evenley Parish Council** - Agree that this merits further study.
- **Hinton-in-the-Hedges Parish Meeting** – see answer Q26.
- **Kislingbury Parish Council** – declines to vote on particular options.
- **Overstone Parish Council** - Possibly although area should stay rural to provide lungs for Northampton.
- **Walgrave Parish Council** - Possibly, careful consideration should be given to impact on village environment and heritage.
- **Weedon Parish Council** - Possibly but needs full community involvement. New development has been over promoted at Long Buckby by DDC whose plans were over ambitious, caused damage and inconvenience to the village centre. Station is an asset, but development has caused problems. Would not like to see character of Long Buckby altered. It has been managed so badly in the past that time and money has been wasted in planning. Peace and safety of local community has been put at risk.
- **Whilton Parish Council** - Scale of proposal would have an adverse impact on historic village centre which is a conservation area. Not a new settlement, merely an urban extension, Long Buckby could become a small town. Scale is inappropriate. Road infrastructure from A5 is unsuitable, it struggles to cope with current demands. Construction traffic will be problematic. Roads in the centre of Long Buckby already suffer from congestion, additional traffic would cause chaos. No viable solution. Southern edge of proposal abuts flood zone 3, flooding is already an issue. Community infrastructure and services are just

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sufficient for existing community, development would need include significant investment for additional services and facilities. Station is inadequate and inaccessible; it would require significant and costly redevelopment.

Community is already affected by Daventry development; this proposal would result in almost continuous development between Daventry and Long Buckby. Recognise need for new houses, Daventry development contributes towards this. Planning more development before Daventry extension is built and impact understood, is appropriate and unfair.

- **Yardley Gobion Parish Council** - Site is close to A5, M1 and West Coast Mainline. Better option of the two being promoted, it more aligned to objective 8. Not really a new settlement, but an extension to Long Buckby that will increase the town disproportionately. Division between old and new will not be clear, it will be one town. Proposal will lead to flooding. Local infrastructure must be upgraded.

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Question 28: Do you agree that spatial option 5b - Milton Keynes North West (Old Stratford) Expansion - has the potential to support a new settlement?

- 155 respondents said 'Yes' (including Parish/Town Council respondents)
- 473 respondents said 'No' (including Parish/Town Council respondents)
- 519 respondents provided specific comments

Those who supported spatial option 5b - Milton Keynes North West (Old Stratford) Expansion made the following key points:

- Requires mitigation to the rights of way network and the use of overbridges (not tunnels) to provide active transport links. Requires screening from neighbouring developments (tree corridors through which active travel routes can run). Break the development into smaller tree lined units to create a set of eco-villages.
- The strategic oil pipeline can be used as an area for recreation and leisure.
- The strategic oil pipeline will be less important as move to zero carbon/zero fossil fuels.
- Weaknesses outweigh the strengths; however careful development around ecological sites and conservation areas could be made.
- Industrial development is still required.
- Support new housing in Deanshanger so family can stay in the area.
- Land West of Old Stratford can come forward independent of other sites being promoted in this area and is the least constrained part of Spatial Option 5b (up to 2,500 dwellings and associated infrastructure/services). Supporting information put forward to promote the site (including landscape, heritage, transport, biodiversity net gain). Comments on the Sustainability Appraisal Assessment of the site (suggest some amendments).
- Eastern half of SLAA Site ID: 47 is suitable for development as part of the new settlement. Query results of the Strategic Land Availability Assessment (SLAA)- supporting information provided. Working with some adjacent landowners. Can support the delivery of Park and Ride, Mass Rapid Transit, and the Green City Gateway (important for Milton Keynes growth).
- Serves to emphasise the inappropriateness of Spatial Option 5a.
- Parts within Flood Zones 1, 2 and 3. Using a sequential approach development can be achieved. The Dogsmouth Brook (tributary of the Great Ouse) runs through the site. Development provides opportunities for small scale flood interventions that will contribute towards the management of flood risk within the Great Ouse Catchment e.g., surface water drainage scheme could restrict the rates and volumes of surface water discharged below the existing rate. There are Natural Flood Risk Management Options. The sites are not in groundwater Source Protection Zones but are underlain by secondary and principal aquifers. The regional use of groundwater in this area makes the site vulnerable to pollution. Need to consider capacity in the sewerage network. Need to follow the Water Framework Directive (WFD) requirements for river quality (water cycle studies may be required/refreshed).
- Support for a train line linked to Milton Keynes; need more transport.

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- If the need for housing is to service areas both in and outside of the county this option rates highly given its location near the mainline rail/road networks.
- Must be carefully handled and with full cooperation of Milton Keynes.
- Policy SD15 of Plan: MK and a Development Framework Supplementary Planning Document produced for this spatial option would be the basis for engagement with Milton Keynes Council (wish to collaborate on the option). This would better integrate the development into the local surroundings and mitigate impacts it might have on Milton Keynes. Site would have an impact on Milton Keynes Strategic Infrastructure (e.g., University Hospital and Further Education Facilities). Welcome opportunity to work collaboratively on what infrastructure is required and possibly jointly commission studies. Reference to flooding and drainage issues that should be considered; see Policies FR1 – FR3 of Plan: MK for locally specific strategic flood risk management. Specific provision for leisure, community and sport facilities should be made (reference to Plan: MK standards and nearby development examples at Milton Keynes East). Need to model and assess the implications for the highway network (A5, Old Stratford Roundabout and other roads in Milton Keynes) and consider mitigation measures. Development should link into pedestrian, cycle, Redway and public transport routes into Milton Keynes including the Mass Rapid Transit (MRT) system Milton Keynes Council is seeking to develop (do not prejudice the provision of bus/ MRT vehicles serving a possible future park and ride site). Old Stratford is identified as where a Green City Gateway could be established (as extension of green infrastructure for Milton Keynes). Any retail provision should be commensurate to the needs of the new community.
- Milton Keynes is an example of where constraints were turned into opportunities e.g., numerous roads cross linear park system but includes pedestrian and cycle crossings; existing woods and historic villages were incorporated; new lakes for wildlife and amenity; communities based around the secondary school Campus. Same can be applied to this location.
- Milton Keynes North West is the most suitable location for a new settlement (concerns raised in relation Spatial Option 5a). Detailed supporting justification and technical information provided to support proposal. Justification includes its ability to respond to West-Northants and Milton Keynes relationship; housing and economic growth at the Oxford-Cambridge Arc; its suitability is recognised in the adopted MKS 2050; it can support the communities of existing settlements near to the site with benefits for the wider area e.g., providing a MRT interchange that is accessed by a new vehicular access point located further north than the Old Stratford Road junction will intercept car journeys before they reach this pinch point. Site area should be extended further to the north-east.
- Several respondents supported the principle of development in this area but stated that a smaller scale of development should be considered (otherwise there will be a loss of rural villages; would only be a satellite housing estate for nearby towns; will increase flood risk; adverse impacts on infrastructure including roads and education).

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- Several respondents supported the option and its location (particularly nearby Milton Keynes) as there is the space to accommodate new development (Milton Keynes is an existing new town); the area is already developed; infrastructure is already in place/good in this location; transport links are good (with the A5 and links towards the M1 and connectivity to London); it has better local employment opportunities close by; there are a range of services; location within the Oxford-Cambridge Arc area; links to Milton Keynes economy, retailing, railway station and Redway system (cycleway network)

Those who objected to spatial option 5b - Milton Keynes North West (Old Stratford) Expansion made the following key points:

- Sites in this vicinity were rejected by a Milton Keynes Area Development Potential Study (1998) because of the underground oil pipe, an underground gas pipe and electricity line above it. Also due to traffic impacts.
- Are public houses, community centres, health centres, schools, local shops, green spaces, pathways of tree lined avenues featured in current development plans where neighbours can interact?
- Some respondents suggested considering a smaller scale of development at this location to address the issues it raises. A sustainable urban extension would be more suitable (scale of the proposed new settlement would not support a strong service base and the viability of new public infrastructure is uncertain).
- Some respondents queried who would be responsible for the new settlements' administration as it would encompass five parishes.
- Some respondents stated the Council should await publication of the Oxford/Cambridge strategy and the AECOM new settlement study.
- Some respondents noted that the number of residents on this site would constitute 96% of the projected population growth between 2020 and 2050 which means that housing need elsewhere would be ignored.
- Some respondents queried if the houses were required for West Northants or Milton Keynes; may not fulfil housing needs of West Northants by providing for Milton Keynes.
- Several respondents suggested there were better options for development/growth, including Northampton; areas to the south of Milton Keynes; the site should be located as an extension to Deanshanger instead; Towcester; Brackley; Daventry; construct a new station between Wolverton and Northampton for future development; Milton Keynes (West); rural villages to accept some development but not that which results in them merging; existing towns and villages across the area which could accept growth; sites between Cosgrove and the A508 that support the employment allocation at Furtho Pits; urban high-density development only; a smaller urban extension at Old Stratford.
- Several respondents referred to issues with the existing road infrastructure/network (A5, A508, A422 and A508/A5/A422 intersection- Old Stratford roundabout, plus local access for surrounding areas/villages) that would be exacerbated by further development. Issues with congestion

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generally and the A5/A508 acts as diversion when there are issues on the M1 causing further congestion; impacts upon local roads/junctions through the villages; implications for road safety (including pedestrians). Recent improvement project has not been successful (at Old Stratford roundabout). Further mitigation is/would be required to alleviate congestion (requires new solution to the roundabout/whole of A5 upgrading). Highways England are trying to de-trunk the road which is not compatible with growth and there are no plans or budget for upgrades in the Plan timeframe. It is not possible to upgrade the road through Old Stratford, particularly the section over the bridge for Stony Stratford. Using land for homes restricts options available for improvements. Towcester Relief Road is not designed to enable future development to the south of the area. The Farthinghoe Bypass and the northern Northampton ring road should be delivered as a priority.

- Several respondents stated existing local services and infrastructure were inadequate and unable to serve a new settlement including school/education capacity (have to travel out of the area for places); transport links (including public transport, nearest railway stations are only accessible by car, no pedestrian and cycle links/routes over the A5/A508 roundabout); medical/healthcare services (including Milton Keynes hospital); water supply and sewage network capacity (Cotton Valley Sewage Treatment Works); energy supply (current frequency of power cuts in the area); emergency services (impacts on Towcester fire and police stations- emergency cover would be from Northampton). There is no supermarket, convenience shop, or public house in walking distance.
- Several respondents stated that there should not be any large developments until infrastructure is in place before housing completions. Estimate the new settlement would require a new secondary school; three primary schools; additional 7 GPs and an extended community health workforce; upgrades to Milton Keynes hospital.
- Several respondents stated the development would be dependent upon infrastructure in Milton Keynes and there may be issues with relying on cross boundary facilities (e.g., fire and police forces rarely work cross boundary (except for major incidents). Response times will need to be considered from Northants facilities only).
- Several respondents were concerned that infrastructure promised in the past alongside new development has not been delivered/made improvements.
- Several respondents referred to other developments that are in progress or are planned and expressed concern these will result in cumulative impacts on traffic, pollution, ribbon development e.g., housing at Towcester south and the racecourse, rail freight terminal at M1 Junction 15, housing developments in the villages, south of Stony Stratford, site AL5 at Old Stratford (South Northants Local Plan Part 2). At Towcester, warehousing developments at sites north of the Bell Plantation on the A5; between the A43/A5 roundabout and Tiffield; between the A43/A5 roundabout and the Towcester Rugby Club; above the A43/Whittlebury junction.

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- Several respondents referred to existing flooding issues in the area which would be exacerbated by the development (reference to River Ouse and tributaries). Unclear if any work has been undertaken with the relevant Lead Local Flood Authority and the Environment Agency to date.
- Several respondents expressed concerns with the loss of greenfield land (including Green Belt land), agricultural land, ancient woodland, and other natural assets. Mitigation will not be able to replace this.
- Several respondents expressed concern with the negative impacts on landscape character, including the Special Landscape Area. Would result in the loss of the rural character of West Northamptonshire, which is part of the heritage and a draw for tourists.
- Several respondents expressed concern with the loss of access to countryside and impacts upon the character of existing local rights of way/bridleways running through the site.
- Several respondents stated that the site would be for dormitory housing/commuter settlement serving the needs of Milton Keynes (there is no employment proposed on the site). Economic benefits for Milton Keynes only, not West Northants. Could direct investment away from Northampton.
- Several respondents stated the option would not meet the Plan objectives.
- Several respondents stated that the proposed settlement is out of proportion in size to the neighbouring villages and would overwhelm them/force coalescence between them and Milton Keynes. The villages have distinct identities; their character would be destroyed.
- Several respondents referred to the site being included within the Milton Keynes 2050 Vision which recommends a Mass Transit System (MRT) extending to the site. Concerns expressed that there are no plans, budget, timescales for the MRT. It would not be delivered in time resulting in the new settlement being a car only site. MRT should be operational before housing.
- Several respondents queried where the focal centre of the new settlement would be as it is dissected by the A5.
- Several respondents expressed concerns with the adverse impacts upon heritage assets, including buildings/conservation areas at the village of Furtho, Grafton Regis, Potterspury, Puxley. Reference also made to the Grade 2* River Bridge over the River Great Ouse; archaeological remains in fields nearby the A5; ridge and furrow; Cuttle Mill Battle Site.
- Several respondents expressed concerns with loss of privacy, increased light, and vehicle pollution, with impacts upon rural character and residents' health.
- Several respondents stated they chose to live in the area for its rural nature and do not wish to live in the suburban/urban location that would be created.
- Several respondents stated they were disappointed that the primary reason for considering this site is because Milton Keynes has instructed the Council to do so (see Milton Keynes 2050 Vision).
- Several respondents stated that without a West Northants Council policy on new settlements it is impossible to assess and judge this proposed site.
- Several respondents expressed concerns with regards to climate change. Upgrading roads will encourage more use of cars; less people will cycle due

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to danger of vehicles, and less people will use public transport due to 'ease' of using car. The river valley/road network would prevent fully integrated footpath and cycle connectivity. Location of site is remote from Milton Keynes and Northampton, and the railway stations are not accessible via sustainable transport- will promote car use. The development will not be located well in relation to employment. Dwellings should be sustainably constructed. Plant trees around the development. Include electric charging points for vehicles.

Comments made by respondents who did not specify 'yes' or 'no':

- Would be economically damaging for the area (including Milton Keynes).
- Does not promise employment opportunities and it does not bring jobs.
- Concerned it will lead to ribbon development on the A422 and A508.
- Any development in this area must be coordinated with Milton Keynes Council to ensure adequate transport links and infrastructure.
- Option could have an impact on Buckinghamshire e.g., the A422 traffic and other unclassified roads across the villages in far northern Buckinghamshire. Should be subject to Duty to Co-operate discussions. Evidence on traffic forecasts and transport mitigation be shared.
- The site is close to the disused Stratford Arm of the Grand Union canal. Consult Buckingham Canal Society (BCS) on any proposals.
- Land within and around the settlement of Roade is as good if not better than that proposed as Old Stratford.
- Potential for significant impact upon the Grade II* church and Manor Farm Dovecote at Furtho, plus to the Conservation Areas at Cosgrove, Potterspury and Deanshanger and the Grade II Registered Park and Garden at Wakefield. There is high potential for archaeology adjacent to Watling Street and any allocation should consider the dominance of the linear character of Watling Street (avoid weakening this with the use of multiple roundabouts).
- Strategic oil pipeline (Buncefield to Blisworth) would need further assessment.
- The Plan should establish a fallback position in planning policy which would be triggered should the Option fail to come forward (if selected).
- Consideration should be given to the composition of the likely population so the housing proposed would relate to this. Consider a substantial percentage of the housing being rental housing owned and managed by the Council.
- Some respondents referred to proposed developments which will also have an impact e.g., warehousing development allocated in the South Northants Local Plan Part 2, AL5.
- Some respondents stated the option was contrary to the Plan objectives.
- Some respondents expressed concerns about the loss of agricultural land (resulting in increased flooding); loss of greenfield sites; woodland and other natural assets which new planting will not be able to mitigate for. Consequent impacts on climate change also referenced.
- Some respondents stated the development would be built to provide dormitory housing serving the needs of Milton Keynes only.

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- Some respondents queried where the focal centre of the new settlement would be as it is dissected by the A5.
- Some respondents expressed concerns about the adverse impacts on existing public footpaths and bridleways running through the site.
- Some respondents queried if the housing proposed at this site would contribute to housing growth targets for Milton Keynes Council or West Northamptonshire Council; or a combination of the two authorities; or Cambridge-Oxford Arc growth. Any housing which meets the needs of Milton Keynes should not be double counted by West Northants, with any shortfall for West Northants addressed by making additional allocations elsewhere.
- Several respondents stated the development is disproportionate to the existing villages. Will result in the coalescence of the surrounding villages and with Milton Keynes. The rural character of the area will be changed.
- Several respondents referred to the existing local road infrastructure already being under pressure especially the A5/A508/A422 (Old Stratford) roundabout. Would require a whole new solution for that roundabout/upgrading along the A5. Pressure increases when issues occur on the M1. National Highways are trying to de-trunk the A5 whereas this option would need increased investment at national level. Consider a bypass to avoid more traffic through villages. Work with Milton Keynes Council to deliver a rapid transit solution to Milton Keynes.
- Several respondents referred to the option being linked to delivery of the Milton Keynes MRT system. Concerned there are no plans, budget, timescales for the MRT; that the development would become a car only site without MRT; it risks the area becoming a gateway and car park for north Milton Keynes and Buckinghamshire. Significant new evidence will be required to demonstrate delivery of the MRT in the plan period and that it is a viable alternative to the car. It must deliver sustainable travel benefits for existing local communities.
- Several respondents stated that the areas' existing infrastructure and services are unable to support further development including schools, doctors, road infrastructure. The development would require its own infrastructure and services including schools, GP surgeries, dentists, community centres, public open space, roads, parks, hospital facilities, employment areas, retail outlets, public transport links (including to Milton Keynes), services such as sewage treatment and disposal/water supply.

Parish/Town Council responses

The following Parish and Town Councils supported spatial option 5b:

- **Brixworth PC** - But have concerns. Will lead to coalescence of the surrounding villages. Must address connectivity that is not dominated by vehicles. Opportunity to showcase other forms of transport in a potentially enlarged garden “city”.
- **Cogenhoe and Whiston Parish Council** (no comments)
- **Culworth Parish Council** (no comments)

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- **Long Buckby PC-** See comments regarding enlarging extensive conurbations.
- **Weedon PC** - Provided not too much open countryside is destroyed and the character of Old Stratford and surrounding villages is maintained. New residents will benefit from proximity to Milton Keynes. Development should not be disproportionate and engulf surrounding villages. The proposal is in keeping with the scale of Milton Keynes which is a more thriving community than West Northants/Northampton town. Residents may appreciate the improved connectivity and rise in house prices. This has been the pattern with expansion around Milton Keynes but should not be at the expense of the separation and character of existing villages as has happened elsewhere.
- **Woodford-cum-Membris Parish Council** (no comments)

The following Parish and Town Councils objected to spatial option 5b:

- **A5 Alliance of Parish Councils** - Should delay the consultation to await publication of the AECOM new settlement study and the draft Oxford Cambridge Arc Spatial Strategy- this will become national planning guidance and not taking it into account may mean the Plan will need to be revisited/face legal challenge. This option is wholly unsuitable. It develops greenfield sites, removes woodland and agricultural land, removing valuable natural assets which new planting will not be able to mitigate. The Council's aim of being a carbon neutral organisation by 2030 and a low carbon economy cannot be realised with this option. The scale is disproportionate to anything nearby, out of scale with the existing smaller, rural village way of life. The houses may accommodate 14,532 new people creating huge demand on local services. The site does not promise employment opportunities; would be dormitory housing serving the needs of Milton Keynes (not West Northants needs). Would bring excessive carbon emissions. Would generate an additional 8,477 cars and vans placing burden on the already overloaded local road network (especially the A5/A508/A422 roundabout). The A508 and A5 become a default diversion route should the M1 be experiencing problems. The A508 and A422 are used for vehicles moving between the M1 and M40. Would require a whole new solution for that roundabout (e.g., overpass or underpass). The A5 would need upgrading (all roads at capacity already). Small back roads in the area are poorly maintained and villages already struggle to cope with 'rat-run' traffic. There are no rail services easily accessible by public transport nearby. There will be warehousing development along the A5 to the south east of the Old Stratford roundabout (allocated in the South Northants Local Plan Part 2, AL5) that will add further pressure to the A5/A508 roundabout. Traffic issues on the A5 have not been part of the Councils' evaluation of potential sites and National Highways have not been consulted about their future plans for this interchange. Would destroy heritage assets at Furtho. Will put strain on the special landscape area that runs down the A508 through Yardley Gobion and Cosgrove parishes. The village of Grafton Regis will be impacted by the traffic; there is no bypass for this village. Listed properties without foundations will be subject

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to more road vibrations which may lead to a loss of the heritage assets. The site seems to be promoted/predicated on the MK2050 ideas of a mass transit system, for which there are no plans at present. It is premature to bring forward this site now; if it was allocated/developed in the plan period, it would be a car-only site and contrary to Spatial Objective 1 on climate. Where would the centre or heart of this new settlement be? It is bound by the A508 on one side, A422 on the other and then dissected by the A5. Should consider if the A5 would be realigned to function as a new boundary to prevent coalescence with Deanshanger and to bypass Potterspury. It would require the building of one secondary school and three primary schools. Journeys to school need to be designed to be safe walking routes to combat climate change. Will need an additional 7 GPs plus an extended community health workforce. Milton Keynes Hospital is already trying to meet the need for developments- new funding is expected but is still in its early stages. No large developments/housing completions should occur until this is in place. There are flood zones and existing major flooding issues in the area; the development would increase surface water and exacerbate flooding issues in the area. Concerned about the inadequacy of the local water and sewerage systems and the frequency of power cuts. Would magnify the local sky glow thus harming the rural nature of surrounding communities. The presence of a strategic oil pipeline would need further assessment. Public footpaths and bridleways run through the site which would impact on their use and enjoyment. The option would not meet plan Objective 1 on mitigating risk of flooding and promoting sustainable travel modes; Objective 5 Education and Skills; Objective 7 Infrastructure; Objective 8 on Connections; Objective 12 on Supporting Rural Communities.

- **Blisworth Parish Council** (no comments)
- **Buckingham Town Council** - oppose a large number of homes being built so close to the A5 Old Stratford roundabout. A major weakness is that the site is bounded by the A422 and A508- an existing strategic highway pinch point. Buckingham is already heavily congested at peak times and this would substantially increase traffic through the town. There are currently no viable options available for increasing highway capacity through or around the town.
- **Cosgrove PC** - Disappointed that the primary reason for considering this site is because Milton Keynes has instructed the Council to do so (included in Milton Keynes 2050 Vision). It would be for dormitory housing serving the needs of Milton Keynes. It would not meet the objective 8 on connections, objective 6 on safety and objective 12 on protecting rural communities. Without a Council policy on new settlements, it is impossible to assess and judge this proposed site. New settlements must not allow the existing villages and communities to coalesce into one large conurbation; this option would merge Deanshanger, Wicken, Old Stratford, Potterspury, Cosgrove and Yardley Gobion. The scale is disproportionate and out of scale to the existing small rural village way of life. There is already pressure on the local infrastructure especially the A5/A508/A422 roundabout (recent National Highways pinch point work has not improved the junction). Would require a

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new solution for that roundabout (e.g., overpass or underpass). Should consider if the A5 would be realigned to act as a new boundary to prevent coalescence with Deanshanger and to bypass Potterspury. The A5 would need upgrading to allow for the traffic and potentially traffic from the second Towcester Extension as per Spatial Option 4b. The site allocated in the South Northants Local Plan Part 2, AL5 will shortly be brought forward for warehousing, which add further pressure to the A5/A508 roundabout and will impact on the proposed site. Land adjacent to AL5 is being promoted in the Strategic Land Availability Assessment and any additional development in Cosgrove would see a continuous ribbon development from the A5 to the Grand Union Canal. The cumulative effect of all this needs to be considered. The site seems to be promoted/predicated on the MK2050 ideas of a mass transit system, for which there are no plans at present. It is premature to bring forward this site now; if it was allocated/developed in the plan period, it would be a car-only site and contrary to Spatial Objective 1 on climate change. There is no mention of Grade 1 and Grade 2 Listed Churches/buildings in the area (other than at Furtho) or the Conservation Areas. The Grade 2* River Bridge over the River Great Ouse is blighted by traffic from M1 or A5 diversions. Who would be responsible for a new settlements' grassroots administration as it would encompass five parishes? Will produce large amounts of surface water, possibly collected in attenuation ponds which would drain to the local water courses. Would generate additional flooding issues on the River Ouse. Consider the implications of flooding at Cosgrove, Stony Stratford and Deanshanger (should be modelled and assessed in conjunction with those affected). Potentially an additional 14,000 children from the development. Schools in the nearby villages are at, or near to capacity. Milton Keynes schools, especially secondary, are also over capacity. Bus services would be needed to transport children to school unless schools were constructed within the new settlement. High volumes of effluent waste will be generated. The areas' sewage system (constructed in forties/fifties) is pumped to Cotton Valley Sewage Treatment Works; doubt it could cope with such a large housing development. The area where this new settlement may be located has little or no sustainable public transport. The current bus service does not provide a sufficient service to gain access to national rail network systems. It would be a car only settlement- contrary to Spatial Objective 1 on Climate Change.

- **Deanshanger PC** - This site is wholly unsuitable. The scale is hugely disproportionate to anything nearby and would be massively out of scale with the existing smaller rural village way of life. The site does not promise employment opportunities and would be built to provide dormitory housing serving the needs of Milton Keynes (not West Northants needs). There is already pressure on the local infrastructure especially the A5/A508/A422 roundabout (recent National Highways pinch point work has not improved the junction). Would require a new solution for that roundabout (e.g., overpass or underpass). The whole of the A5 would need upgrading. The A508 to M1 is at capacity now and the pressures on the A5 and A508 are increased when

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issues occur on M1. The A422 to/from Buckingham is also at capacity already. Queues to exit Deanshanger are lengthy at rush hours. Small back roads are badly maintained and Deanshanger and Passenham already struggle with 'rat-run' traffic. National Highways are trying to de-trunk the A5 whereas this option would need increased investment not downgrading. A warehousing development is due to take place along the A5 (allocated in the South Northants Local Plan Part 2, AL5) that will add further pressure to the A5/A508 roundabout. The site seems to be promoted/predicated on the MK2050 ideas of a mass transit system, for which there are no plans at present. It is premature to bring forward this site now; if it was allocated/developed in the plan period, it would be a car-only site and contrary to Spatial Objective 1 on climate change. Concerned about references in plan 'as part of a greater MK'. Villages such as Deanshanger are part of the new West Northants, not a greater MK. Do not want to become dormitory housing for Milton Keynes. There are flood zones and existing major flooding issues in the area. The development would increase surface water and exacerbate flooding issues in surrounding areas. Where would the centre or heart of this new settlement be? It is bound by the A508 on one side, A422 on the other and then dissected by the A5 (new settlement makes no sense when it is split in two by the A5). Should consider if the A5 would be realigned to act as a new boundary to prevent coalescence with Deanshanger and to bypass Potterspury. The option would not meet plan Objective 1 on mitigating risk of flooding and promoting sustainable travel modes; Objective 5 Education and Skills; Objective 7 Infrastructure; Objective 8 on Connections; Objective 12 on Supporting Rural Communities. It develops greenfield sites, removes woodland and agricultural land, removing valuable natural assets which new planting will not be able to mitigate. The Councils' aim of becoming a carbon neutral organisation by 2030 and a low carbon economy cannot be realised if this option is adopted. The consultation should be delayed awaiting publication of the draft Oxford Cambridge Arc Spatial Strategy. This will become national planning guidance and take precedent; not taking it into account may mean that the Plan will need to be revisited/face legal challenge.

- **Greens Norton PC** - Disappointed that the primary reason for considering this site is because Milton Keynes has instructed the Council to do so (included in Milton Keynes 2050 Vision). It would be for dormitory housing serving the needs of Milton Keynes. It would not meet the objective 8 on connections, objective 6 on safety and objective 12 on protecting rural communities. Without a Council policy on new settlements, it is impossible to assess and judge this proposed site. New settlements must not allow the existing villages and communities to coalesce into one large conurbation; this option would merge Deanshanger, Wicken, Old Stratford, Potterspury, Cosgrove and Yardley Gobion. The scale is disproportionate to anything in the local vicinity and out of scale to the existing small rural village way of life. There is already a pressure on the local infrastructure especially the A5/A508/A421 roundabout. Would require a new solution for that roundabout (e.g., overpass or underpass). Should consider if the A5 would be realigned

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to act as a new boundary to prevent coalescence with Deanshanger and to bypass Potterspury. The A5 would need upgrading to allow for the traffic and potentially traffic from the second Towcester Extension as per Spatial Option 4b. The site at Old Stratford allocated in the South Northants Local Plan Part 2, AL5 will shortly be brought forward for warehousing, which add further pressure to the A5/A508 roundabout.

- **Nether Heyford PC** - Needs re-thinking. Old Stratford is an extension settlement to Stony Stratford, so any further development needs work with Milton Keynes Development Corporation. This area is also subject to significant flooding risk.
- **Old Parish Council** - Some potential, although also notable weaknesses.
- **Old Stratford PC** - Disappointed that the primary reason for considering this site is because Milton Keynes has instructed the Council to do so (included in Milton Keynes 2050 Vision). It would be for dormitory housing serving the needs of Milton Keynes. It would not meet the objective 8 on connections, objective 6 on safety and objective 12 on protecting rural communities. Without a Council policy on new settlements, it is impossible to assess and judge this proposed site. New settlements must not allow the existing villages and communities to coalesce into one large conurbation; this option would merge Deanshanger, Wicken, Old Stratford, Potterspury, Cosgrove and Yardley Gobion. The scale is disproportionate and out of scale to the existing small rural village way of life. There is already pressure on the local infrastructure especially the A5/A508/A421 roundabout. Would require a new solution for that roundabout (e.g., overpass or underpass). Should consider if the A5 would be realigned to act as a new boundary to prevent coalescence with Deanshanger and to bypass Potterspury. The A5 would need upgrading to allow for the traffic and potentially traffic from the second Towcester Extension as per Spatial Option 4b. The site allocated in the South Northants Local Plan Part 2, AL5 for warehousing will add further pressure to the A5/A508 roundabout. Land adjacent to AL5 is being promoted in the Strategic Land Availability Assessment and any additional development in Cosgrove would see a continuous ribbon development from the A5 to the Grand Union Canal. The cumulative effect of all this needs to be considered. The site seems to be promoted/predicated on the MK2050 ideas of a mass transit system, for which there are no plans at present. It is premature to bring forward this site now; if it was allocated/developed in the plan period, it would be a car-only site and contrary to Spatial Objective 1 on climate change. There is no mention of Grade 1 Listed Church and Tithe Barn at Passenham along with other Grade 2 listed buildings, also the Conservation Area in Old Stratford and Grade 2* River Bridge over the River Great Ouse. Who would be responsible for a new settlements' grassroots administration as it would encompass five parishes? Will produce large amounts of surface water, possibly collected in attenuation ponds which would drain to the local water courses. Would generate additional flooding issues at the River Ouse at Old Stratford. Consider the implications of flooding at Cosgrove, Stony Stratford and Deanshanger (should be modelled and assessed in conjunction with

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those affected). Potentially an additional 14,000 children from the development. Schools in the nearby villages are at, or near to capacity. Milton Keynes schools, especially secondary, are also over capacity. Bus services would be needed to transport children to school unless schools were constructed within the new settlement. High volumes of effluent waste will be generated. The areas' sewage system (constructed in forties/fifties) is pumped to Cotton Valley Sewage Treatment Works; doubt it could cope with such a large housing development. The area where this new settlement may be located has little or no sustainable public transport. The current bus service does not provide a sufficient service to gain access to national rail network. It would be a car only settlement- contrary to the Spatial Objective 1 on Climate Change.

- **Potterspury PC** - Site comes from the MK2050 Vision (where its identified as a suitable site in the future as an offshoot of a Mass Transit System). MK2050 plans envisage a feeder road running alongside the A5 between Yardley Gobion and Potterspury and a Park & Ride with ancillary developments near Furtho. The plans locate development directly over the site of the former village of Furtho where there is a church and dovecote (both Grade II* listed). Have previously opposed the plans as they would negatively impact on a valuable heritage site; they would only feed Milton Keynes; and they would negatively impact on the rural environment of surrounding villages. Appears the plans have encouraged developer activity, and this has led to this site being an option. The proposal would dwarf neighbouring villages and be bigger than Old Stratford, Deanshanger, Cosgrove, Yardley Gobion and Potterspury combined. The villages have distinct identities, and they would be merged into one conurbation. The A5/A422/A508 interchange (Old Stratford roundabout) has already been identified as a transport pinch-point requiring substantial upgrading (recent upgrades have not brought improvements). Congestion and long delays are now a regular occurrence along the village main roads and “rat runs” are common. It would add little to the quality of life of those in West Northants and the residents of the new development would look to Milton Keynes for most services. The settlement would have little positive impact on Towcester and be of no benefit to the development and economic wellbeing of Northampton. Local plans for warehousing adjacent to the roundabout will add further congestion. The A5 would require a complete realignment; few feasible route options would be available because of the location of the new settlement/housing. Traffic issues on the A5 have not been part of the Councils' evaluation of potential sites and National Highways have not been consulted about their future plans for this interchange. There is no infrastructure for water, sewage, or roads to accommodate such growth at this site. The River Ouse at Stony Stratford regularly floods into the town. There are no rail services easily accessible by public transport close to this site. Local primary schools are at capacity and a new secondary school or a complete rebuilding of Elizabeth Woodville (South) would be required. Bus services would be needed to transport secondary pupils. This development would be built on greenfield sites, using agricultural land, remove ancient

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woodland and impact other natural assets. Potterspury residents chose to live in countryside and rural area, not suburban area (references recent survey). The site would provide dormitory housing serving the needs of Milton Keynes and would rely on Milton Keynes for many services/facilities. The site will not meet the economic needs of West Northamptonshire in general and the development of Northampton as a city. This site does not meet the plan objectives for Objective 8 on Connections, Objective 6 on Safety, Objective 12 on Protecting Rural Communities, and Objective 1 on Climate Change (would rely on cars as any MRT system would be many years away). Decisions on the MRT system are outside the control of West Northants Council.

- **Silverstone PC** - How can this be a new settlement when it is adjacent to Old Stratford? Its location on some of the busiest roads in the area must be questioned (traffic, noise, and other environmental reasons). Goes against the principle of coalescence of settlements as it pushes Old Stratford and Stony Stratford together (extension to Milton Keynes) and causes issues on what is already a congested major road junction. Should show the development already planned in the area so the potential impact can be understood. The possible further urban extension to Towcester must also be considered in this context as vehicles from that would increase the pressure on the A5/A508/A421 roundabout.
- **Stony Stratford Town Council** - Not suitable. The site straddles the A5 which is already a heavily congested area (A508/A5/A422). The future of the Oxford to Cambridge Arc is uncertain and to allocate significant development in this location would be premature. The MK2050 document is a strategy document, not a planning document and to rely on this as a basis for significant growth is inappropriate and premature.
- **Syresham PC** - Concerned about flooding issues, increased traffic, and increased air pollution in close proximity to the new housing developments.
- **Whittlebury PC** - The scale is unsuitable. Would be dormitory housing serving the needs of Milton Keynes. It would not meet Objective 8 on connections, Objective 6 on safety and Objective 12 on protecting rural communities. New settlements must not allow the existing villages and communities to coalesce into one large conurbation; this option would merge Deanshanger, Wicken, Old Stratford, Potterspury, Cosgrove and Yardley Gobion. The scale is disproportionate and out of scale to the existing small rural village way of life. There is already pressure on the local infrastructure especially the A5/A508/A421 roundabout (recent National Highways pinch point work has not improved the junction). Would require a new solution for that roundabout (e.g., overpass or underpass). Should consider if the A5 would be realigned to act as a new boundary to prevent coalescence with Deanshanger and to bypass Potterspury. The A5 would need upgrading to allow for the traffic and potentially traffic from the second Towcester Extension as per Spatial Option 4b. The site allocated in the South Northants Local Plan Part 2, AL5 for warehousing will add further pressure to the A5/A508 roundabout. Land adjacent to AL5 is being promoted in the Strategic Land Availability Assessment and any additional development in Cosgrove would

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see a continuous ribbon development from the A5 to the Grand Union Canal. The cumulative effect of all this needs to be considered. The site seems to be promoted/predicated on the MK2050 ideas of a mass transit system, for which there are no plans at present. It is premature to bring forward this site now; if it was allocated/developed in the plan period, it would be a car-only site and contrary to Spatial Objective 1 on climate change.

- **Wicken PC** - Site is unsuitable. A new settlement implies that the area will already have or will acquire before completion all parts of the infrastructure for it to integrate into the surrounding communities. This new settlement would force coalescence with neighbouring towns and villages removing their identity. It is likely to become a commuter community for Milton Keynes thus increasing carbon emissions. The houses may accommodate 14,532 new people driving demand on local services. This site is within the scope of the MK 2050 vision which recommends a mass transit system running up toward Potterspury. If this occurs, then it should be operational before a commitment to further housing in this area. Currently, the nearest railway stations are 3.3 and 5.3 miles away neither with direct public transport services. The houses would generate an additional 8,477 cars and vans which would place an excessive burden on the already overloaded road network at this junction. Additional vehicles will create extra pollution and affect residents' health. It would require the building of one secondary school and three primary schools. Journeys to school need to be designed to be safe walking routes to combat climate change. Will need an additional 7 GPs plus an extended community health workforce. Milton Keynes Hospital is already trying to meet the need for developments- new funding is expected but is still in its early stages. No large developments/housing completions should occur until this is in place. Site would accommodate 96% of the projected population growth (2020-2050) so any housing need elsewhere in the county would be ignored. The site has extremely poor transport connections (already overstressed). The A508 and A5 become a default diversion route should the M1 be experiencing problems. The A508 and A422 are used for vehicles moving between the M1 and M40. Yet to see the impact of the rail freight terminal at Courteenhall. The business park proposed at Old Stratford is expected to have 24/7 distribution leading to higher HGV journeys in this location. The new settlement would be dissected by the A5 diminishing the potential for a focal centre. The overall effect will be one of coalescence losing the distinctiveness of local communities. The ancient village of Furtho with its Grade II 12th Century church would be overwhelmed. Concerned about the inadequacy of the local water and sewerage systems, the frequency of power cuts and the risk from flooding in this location. Would magnify the local sky glow thus harming the rural nature of surrounding communities.
- **Yardley Gobion PC** - The site is unsuitable. Would be dormitory housing serving the needs of Milton Keynes. It would not meet Objective 8 on connections, Objective 6 on safety and Objective 12 on protecting rural communities. New settlements must not allow the existing villages and communities to coalesce into one large conurbation; this option would merge

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Deanshanger, Wicken, Old Stratford, Potterspury, Cosgrove and Yardley Gobion. The scale is disproportionate and out of scale to the existing small rural village way of life. There is already pressure on the local infrastructure especially the A5/A508/A421 roundabout (recent National Highways pinch point work has not improved the junction). Would require a new solution for that roundabout (e.g., overpass or underpass). Should such a new settlement be built where would its centre be? It is bound by the A508 on one side and then dissected by the A5 on the other. Should consider if the A5 would be realigned to act as a new boundary to prevent coalescence with Deanshanger and to bypass Potterspury. The A5 would need upgrading to allow for the traffic and potentially traffic from the second Towcester Extension as per Spatial Option 4b. The site allocated in the South Northants Local Plan Part 2, AL5 for warehousing will add further pressure to the A5/A508 roundabout. Land adjacent to AL5 is being promoted in the Strategic Land Availability Assessment and any additional development in Cosgrove would see a continuous ribbon development from the A5 to the Grand Union Canal. The cumulative effect of all this needs to be considered. The site seems to be promoted/predicated on the MK2050 ideas of a mass transit system, for which there are no plans at present. It is premature to bring forward this site now; if it was allocated/developed in the plan period, it would be a car-only site and contrary to Spatial Objective 1 on climate change. Would destroy heritage assets at Furtho. Will put strain on the special landscape area that runs down the A508 through Yardley Gobion and Cosgrove parishes. The village of Grafton Regis will be impacted by the traffic; there is no bypass for this village. Listed properties without foundations will be subject to more road vibrations which may lead to a loss of the heritage assets.

The following Parish and Town Councils did not specify ‘yes’ or ‘no’:

- **Blakesley PC** - This site is unsuitable. Disappointed that the primary reason for considering this site is because Milton Keynes has instructed the Council to do so (included in Milton Keynes 2050 Vision). It would be for dormitory housing serving the needs of Milton Keynes. It would not meet the objective 8 on connections, objective 6 on safety and objective 12 on protecting rural communities. Without a Council policy on new settlements, it is impossible to assess and judge this proposed site. New settlements must not allow the existing villages and communities to coalesce into one large conurbation; this option would merge Deanshanger, Wicken, Old Stratford, Potterspury, Cosgrove and Yardley Gobion. The scale is disproportionate and out of scale to the existing small rural village way of life. There is already pressure on the local infrastructure especially the A5/A508/A421 roundabout. Would require a new solution for that roundabout (e.g., overpass or underpass). Should consider if the A5 would be realigned to act as a new boundary to prevent coalescence with Deanshanger and to bypass Potterspury. The A5 would need upgrading to allow for the traffic and potentially traffic from the second Towcester Extension as per Spatial Option 4b. The site allocated in the South Northants Local Plan Part 2, AL5 for warehousing will add further pressure to

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the A5/A508 roundabout. Land adjacent to AL5 is being promoted in the Strategic Land Availability Assessment and any additional development in Cosgrove would see a continuous ribbon development from the A5 to the Grand Union Canal. The cumulative effect of all this needs to be considered.

- **Evenley PC** - Yes and No. Agree that this merits further study.
- **Hinton-in-the-Hedges Parish Meeting** – See answer Q26
- **Kislingbury Parish Council** – declines to vote on particular options.
- **Milton Malsor PC** - Housing areas north of Old Stratford will increase traffic along the A508 to Junction 15, and potentially overload the A5/A508 roundabout (already frequently congested).
- **Wootton PC:** - Additional information required.

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Question 29: What approach do you think the WNSP should take to development in the rural areas, in particular the level of growth that may be appropriate and where that growth could be best accommodated?

This question was answered 593 times and the following key points were raised:
(They are grouped under headings for ease of reference)

Development in the rural areas

- Not in rural areas as they have over provided housing growth in recent years
- Least growth in rural areas
- Numerous responses to ensure no further development or expansion of Towcester
- No further development or expansion of Brackley
- Large scale development around major towns and larger suburban areas
- Numerous responses for no development near established villages that have already take a lot of growth e.g., include Long Buckby, Deanshanger
- Further expansion of towns, Northampton, Daventry, Brackley, Long Buckby where there is infrastructure
- WNSP will need to offer lifeline to smaller settlements to ensure that they 'thrive and survive'
- Avoid level of growth that tips villages into being small towns

Level of Growth

- Maintain current level (reflective of size)
- Small scale and consider amenities and facilities
- On Infill sites only
- Growth in rural areas should be driven by local housing need (market, rented social and affordable)
- Linked to development of town
- Residential development should be proportionate to settlement needs
- Large scale growth to be avoided
- Increase density on brownfield sites
- Small developments that do not alienate new housing from existing communities
- Sensible scale in a suitable place e.g., 5 - 10% of each settlement
- Restricted growth, rural areas do not have capacity for increased traffic nor space or infrastructure
- Small level of development as indicated in neighbourhood plans
- Villages that have previously had substantial growth should have smaller targets for new housing.
- The level of growth in the rural areas will need to be informed by:
 - o the overall housing requirement.
 - o the realistic supply within the Plan period from the strategic sites deemed suitable and appropriate for allocation.
 - o the realistic supply from existing commitments and windfalls within the plan period.

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- the scale of local needs identified within the rural area.
- the availability of suitable land.
- Development should NOT be based on HENA but based on present need not future projections
- Even distribution of small-scale growth across the rural area
- Rural growth kept to a minimum
- Capped at 20 units per settlement
- Small- medium scale development at larger settlements in the rural area allowing housing choice and social and economic benefits. A blended approach with growth at Towcester and Brackley.
- Spread growth proportionately
- Limit growth to maintain rural nature of villages
- Small bespoke developments, maximum of 50 units
- Needs tangible vision for growth in the rural areas to meet the need and deliver the spatial vision.
- Growth relative to settlement hierarchy

Where to accommodate growth

- Allocate higher level of growth in rural areas to ensure that there is a contribution to affordable housing and ensure the viability of rural services
- Distribute housing growth across rural settlements, keeping relative size between bigger and smaller settlements
- All rural communities should be increased in proportion to their size and allow more or better facilities for local rural communities
- Linked to development of nearby towns
- Rural sites remote from towns lowest priority
- Several responses that growth should be in areas of employment e.g., Northampton and motorway junctions not next to small villages with inadequate infrastructure
- Avoid coalescence with the main towns
- Create new village / new settlements similar to Mawsley
- Build a new towns
- Develop brownfield sites first
- Numerous responses for development only within village boundaries
- Low-cost housing within city centres and mass public transport
- No further development in old Stratford
- A14 east-west corridor e.g., Harrington Airfield site and Kelmarsh estate
- Sites promoted at Hartwell, Harpole, Roade, Barby
- Majority of growth should be at Northampton as major conurbations
- Focus development in the primary and secondary service villages
- Establish a tier above primary service villages ‘sustainable villages’ allowing level of service provision to meet day to day needs of residents and of scale capable of supporting proportionate and sustainable housing growth, with close physical links to 4 main settlements and assign a level of growth to each the sustainable villages e.g., Deanshanger.
- Mawsley areas as an alternative site for the full quota of housing

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- Large new settlements completely alter the historic identity and idiosyncratic character of an area and often have little character of their own.
- Avoid unrestricted growth without any additional provision of services
- Where there is infrastructure e.g., Long Buckby with electric railways a part to play in future developments
- Long Buckby would no longer be a village if proposals were carried out.
- New settlement should not subsume existing smaller settlements
- Mixed strategy approach welcomed to ensure there is delivery of growth.
- Not on the A5
- Public transport corridor focused strategy for growth can sustainably meet the rural growth
Not North of Northampton as this is at capacity
Take account where existing development has already occurred

Employment in rural areas

- Limit to areas where they can be served from major roads on the periphery of settlements
- Small scale employment only in rural areas, sympathetic to local character
- Over concentration of warehousing
- Negative impact of lorry movements (including air, noise, traffic impact)
- Over reliance on logistics and warehousing - there has to be a drive for balance to create a better and more sustainable community.
- Development in rural areas is not the answer. For sustainable growth to be achieved focus must remain on Urban areas and their delivery of balanced residential and employment objectives that support aspirations to be carbon neutral. there has to be a drive for balance to create a better and more sustainable community.

Identified Rural Issues due to growth

- Proper engagement and consultation with rural communities
- Preserve identity of rural communities
- Preserve heritage and culture, including SLA and designated and non-designated heritage assets
- Protect and preserve green spaces – ensure not in use before developing, positive role for communities in terms of health, mental wellbeing, and preservation of the environment
- Ensure that rural housing developments do not act as dormitories for out commuting
- Coalescence between towns and smaller villages
- Provide a means of achieving thriving vibrant villages
- Biodiversity of the open countryside
- Ensuring rural character isn't harm and impacts tourism
- Community cohesion of new developments in rural settlements
- All development requires appropriate supporting infrastructure

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- Role of neighbourhood plans, identifying sites to meet need
- Village life will be eradicated by further development in rural areas
- Travel from villages very poor – lack of public transport and congested road network
- Flood plains around villages are needed
- Ensure development reflects housing needed by local villagers/ parishes to help identify need
- Consultation and engagement with local residents.
- More information required as to what the spatial strategy for the rural area is.
- Impact on climate change considerations esp. reducing carbon release and enabling reducing the need to travel. Implications of COP26.
- Importance of growth for smaller settlements to ensure that they continue to be vital and viable
- High quality development for a wide range of uses
- Well-connected local facilities and transport links
- Community integration and public space
- Risk of flooding e.g., at Deanshanger
- Agricultural needs should also be considered - need food as well as houses
- Educational needs of the area when large developments occur
- Northern Relief Road is essential
- Over supply of housing in rural areas
- Proposed levels of growth will have significant impact on emergency services and ability to cope
- Development to respond to local topography
- Undertake a rural 'health check' for all rural settlements

Parish and Town Councils who responded and the key issues raised:

- **A5 Alliance of Parish Councils** - The West Northants Strategic Plan notes that rural areas have over-provided in terms of additional dwellings provided and the current identity of rural communities should be preserved. Having some housing growth evenly spread across existing rural settlements could be considered keeping the relative size between the larger and smaller settlements as it is now. It could also better reflect the housing needed by local villagers and local parishes and towns should be involved to help identify need and consider planning options at an early stage. Encouraged to have local plans in which need is identified. Those villages that have already seen substantial growth should have a smaller target for new housing. The idea of spreading a little bit of growth evenly across existing settlements should be considered. This would keep the relative size between the larger and smaller settlements as it is now. The smaller settlements would not atrophy/wither but may get a welcome boost. It would also better reflect the housing needed by local villagers. Great care needs to be taken to ensure that the local infrastructure can cope.

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- **Blakesley PC** - The idea of each village having a target to increase its housing should be considered but keeping the relative size between the larger and smaller settlements as it is now.
- **Boddington PC** - Level of growth in rural areas to continue to follow the level of identified needs. The parish would be happier with smaller, more bespoke developments aligned with our local housing needs
- **Braunston PC** - The strategy should recognise the value of agriculture in producing food locally to reduce food-miles. Braunston PC would like to see greater recognition in the strategy of the importance of agriculture in our rural areas and the benefits of protecting BMV land. The current views of Braunston PC on other aspects relating to development in rural areas are all effectively set out in the made Braunston Neighbourhood Development Plan. The objectives of local Neighbourhood Plans should be reflected more clearly in the vision and considered more transparently in the options appraisal.
- **Brixworth PC and Brixworth Strategic Planning Working Group** - The rural areas have had more than their “share” of developments in recent years, often developer rather than plan led. Neighbourhood plans have a part to play in recognising what is needed for their areas. Rural development should not be concentrated in the Primary Service Villages but should be spread in a proportionate manner across all settlements and of a type the community requires. It is noticeable that several communities have become more “dormitory villages” where the young or elderly cannot afford to live. As a result, rural primary schooling has some large schools at or near capacity whereas other smaller schools are advertising spaces. Rural areas do not have the facilities that urban areas have or SUEs should have. Connectivity is usually poor and bus services poor.
- **Bugbrooke PC** - There has already been a huge amount of growth in the Rural Areas in recent years and at the current rate it would meet half of the overall all housing need for the period 2050. This does not fit with the council's overall strategy to develop the main towns and would be detrimental to Northamptonshire's character and charm. The erosion of picturesque villages into sprawling suburbs contradicts the overall strategy to focus on creating urban hubs in the county's towns. WNC must be mindful that in loading new developments into “service villages,” the services in those villages will become unable to support the larger communities. The opportunity to create a ‘new settlement’ maybe a critical tool in satisfying the demand for 7860 rural homes. Allowing parishes, the opportunity to accept or reject very small developments may also allow for manageable growth in the villages that meet the needs of the village. Most villages are happy to use very small patches of land to add a few new homes as they can keep smaller villages alive by bringing in young families, but parishes should play a large role in these developments as they know what is needed in the community.
- **Church with Chapel Brampton PC** - Allow modest extensions to rural villages (say circa 5%) so that village shops, pubs and schools can be supported and remain viable.

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- **Cogenhoe and Whiston PC** - Infill housing that respects the current village confines but with consideration of effect on facilities & infrastructure.
- **Cold Higham PC** - Growth in rural areas should be organic, i.e., to fit the needs of the area, rather than 'planned' or imposed from above. If not then the County will be in danger of losing its rural character. We are largely a farming community after all.
- **Cosgrove PC** - Great care is required to ensure local infrastructure can cope with any new development.
- **Daventry Town Council** - Be visionary for the future, build on existing infrastructure rather than creating new. Sustainable transport and technologies to reduce the carbon footprint should be a priority consideration.
- **Deanshanger PC** - The idea of spreading a little bit of growth evenly across existing settlements should be considered. This would keep the relative size between the larger and smaller settlements as it is now. The smaller settlements would not atrophy/wither but may get a welcome boost. It would also better reflect the housing needed by local villagers. Those villages that have already seen substantial growth should have a smaller target for new housing. Deanshanger for example has seen massive development in recent years without upgrades to its infrastructure. Great care needs to be taken to ensure that the local infrastructure can cope, but a policy of 5 or 10% expansion may be worth pursuing. All parishes to develop a local plan and allow that to do the local allocation with the numbers being set in the Spatial Strategy.
- **Easton Neston PC** - The preservation of our green spaces as presented in the 'Vision' is vital and needs to be a priority, so that future generations benefit from the continued healthy environment that these spaces enable.
- **Ecton PC** - EPC believe that special consideration should be taken for rural areas. EPC recommends WNC adopt a similar policy as outlined in their Neighbourhood plan with a hierarchy of settlements agreed to protect and enhance the county's rural areas and limits new housing to small scale infill and rural exceptions sites in rural areas.
- **Evenly PC** - Development in the rural areas should maximise the use of sites) within existing village envelopes before greenfield sites are considered. Good broadband connectivity is an important part of infrastructure in villages and rural areas, enabling people to work from home and reduce travel to work.
- **Eydon PC** - Significant house building projects should only be undertaken in the rural areas where the existing infrastructure and sustainability status are appropriate.
- **Flore PC** - Flore has accepted an increase in housing numbers in the last few years of approximately 20% without any increase in facilities (and the loss of some). We have in place a Neighbourhood Plan but are already considering the need to look beyond due to the known demand for affordable accommodation needs and single-storey accommodation for an elderly population needing to downsize. Any expansion will need to respect the need to retain the village identity and must be accompanied by a commensurate expansion of facilities. Villages like ours need to be able to offer spaces and

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buildings on a scale which support and maintain a Community identity, whatever its size, if it is not to become a commuter suburb. It also needs to support its agricultural base which may well become more important in a future in which climate change may dictate a fresh look at what is locally produced and marketed. Other local businesses should be supported and encouraged, and the potential for attracting tourists' revenue considered.

- **Greens Norton PC** - Development in the rural areas should be allowed and planned to maintain the size of the villages in proportion with any development. Access to local infrastructure is paramount and the cumulative impacts considered.
- **Guisborough PC** - The rural housing need should be based on the needs identified in the Parish Neighbourhood/Village Plans where applicable.
- **Harrington PC** - There are two distinct sources of growth in rural areas: new building and conversions within villages and the construction of new settlements. Both are sensitive. Development within existing village boundaries should be determined by those living there, through a Neighbourhood Plan. Appendix 3 the Strategic Land Availability Assessment includes as item 24 Harrington Airfield. Despite concluding that it is unsustainable in the absence of a rail connection and further that it would adversely affect the significance and setting of existing heritage assets the site has not been ruled out. This should be determined as not suitable for development. The land South of Market Harborough, we support the WN Council intention of not pursuing this site. There needs to be a gap between settlements and development of this land would blur the distinction between the urban environment of Market Harborough and the rural openness of the villages of Great Oxendon and East Farndon.
- **Hinton-in-the-Hedges PC** - The approach taken by the old South Northants eventually had a good deal of acceptance. The concept of grading villages with sustainability being a consideration seemed widely accepted. The idea of village confines meant that everyone knew where they stood in respect of development. These principles should be carried forward into West Northants.
- **Holcot PC** - Adopt existing policies that protect rural communities (e.g., no building in open countryside)
- **King's Sutton PC** - Growth should not, as has been suggested by some, be calculated based on historic growth. That would mean those who have taken the pain to date, would be expected to take even more pain in future. Growth should be allowed outside of agreed village confines only in very exceptional cases. This should be strictly adhered to so as to preserve the rural nature of the villages and to ensure that whatever is allowed by way of expansion, is environmentally sound. Growth should primarily be to meet village requirements in terms of true affordability and house size e.g., smaller starter homes should be prioritised over larger 3/4/5-bedroom houses.
- **Kingsthorpe PC** - Local Parishes to give an input. Locations need to be sustainable and protect character of villages and conservation areas.
- **Kislingbury PC** - Kislingbury Parish Council is opposed to the use of the northern side of the A4500 at Junction 16 (on the other side of the road from

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Panetone Park) as a ‘spatial option’ to meet economic need. To enable real housing need to be met, there should be construction of homes available on a variety of tenures including shared ownership. The use of the term ‘affordable’ on the Strategic Plan should be monitored and readers should be made aware that this really means prevailing market value. The use of Community Led and not-for-profit housing initiatives needs to be prioritised to address the needs of West Northants residents. The logistics-led development that has occurred along the M1 corridor despite objections. It has, created employment that is unskilled, insecure (zero contracts and agency work) and low paid. This makes it harder for people to afford houses locally. The use of the residual requirements for economic (employment) need should be carefully focused and aligned with the developing West Northants Anti-Poverty Strategy to develop to the greatest extent possible, well paid, permanent, and satisfying work.

- **Little Houghton PC** - LHPC support the wording in Spatial Option 6 – Rural Areas. ‘The level of growth needs to recognise the need to protect and enhance the special environmental and social characteristics of the rural area. It is also important that the level of growth in rural areas is supported by appropriate levels of infrastructure’. LHPC is not averse to appropriate growth when it is supported locally. Growth in rural settlements should be based on local need.
- **Long Buckby PC** - To protect the rural environment by protecting rural communities. The communities are the custodians of the environment
- **Maidwell with Draughton PC** - Object to Spatial Option and Spatial Option 6. The main reasons for the objections are as follows: 1. Maidwell with Draughton Parish consists of two small rural villages. Maidwell already experiences problems regarding traffic, and this is the main issue of concern for the Parish Council and the residents. A residential development of this size at one or both ends of the A508 would put enormous pressure on this road and therefore the traffic travelling through the Parish would become unmanageable. 2. Maidwell and Draughton only have rural village services and are a large distance from any major town in West Northamptonshire. Both villages rely heavily on what Market Harborough, Brixworth and Northampton provide. A major investment would have to be made to these services to support the proposed development including roads, schools, health centres, flood control infrastructures etc. 3. The sites’ proposed span across attractive hillside and open fields. The area proposed that borders East Farndon Parish is a popular walking spot, and it is this green, open space that is invaluable for supporting the mental health and wellbeing of residents of Market Harborough and all the surrounding villages. 4. Both sites are ‘green space’ and are vital in contributing to the reduction of climate change. This is highlighted as a key strategy for WNC.
- **Moulton PC** - Economic growth opportunities need to be within easy reach of residential development. This is indicated on P11, but this is not followed through.

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- **Nether Heyford PC** - Scale is the key consideration for rural development. There is a tipping point where villages in effect become small towns and lose the characteristics of a true village with close community and social cohesion, aside from any negative visual impact. WNC is blessed with many beautiful villages which could easily be damaged through excess development and these are critical to the development of tourist business and visitor trade. The abiding development principles should therefore be meeting local need and protecting and enhancing existing assets. Particular attention in meeting local need should be on housing mix, ensuring adequate provision for younger and older residents. Older residents in larger family homes are especially challenged through the paucity of properties suitable for downsizing. This freezes out families and blocks the natural population cycle, which is damaging to village vitality. Also, where Neighbourhood Plans are 'made' these should be fully respected and where villages do not have Neighbourhood Plans WNC should support and encourage their development.
- **Old PC** - Rural areas should be respected as individual communities with their own identity, and any growth should be small scale and on sites clearly identified and approved at local (parish) level. Justification for abundant housing and business growth in, or adjacent to, villages is not made.
- **Old Stratford PC** - Great care is required to ensure local infrastructure can cope with any new development.
- **Overstone PC** - Lilbourne and Yelvertoft. A new settlement similar to Mawsley straddling the Lilbourne/Yelvertoft border of about 10,000 new homes plus. Creating a new Parish could fulfil a third of the housing needs of 30,000 as outlined. Would also address new housing in rural area. This area as stated previously has good road links, rail links so requires limited highway infrastructure.
- **Pitsford PC** – Full draft should include strategic priorities that protects the important rural areas to the north of Northampton, specifically Pitsford.
- **Pottersbury PC** - Potterspury is familiar with restricted growth rates and has seen an increase in housing stock of around 10% since 2011. The idea of encouraging growth across settlements has merit although providing growth where there can be sustainable facilities is important. Also, post-Covid the concepts of homeworking and the requirements of residents needs serious reappraisal. The crucial areas to consider must be the requirements for transport, education, and the location of health facilities.
- **Silverstone PC** - Daventry and South Northants are not only rural areas but also have their own unique character and beauty with many very pretty villages. This also serves to preserve nature and clean air and should not be turned into a built environment. For such brown field sites should be the primary choice for such sites.
- **Syresham** - Syresham village has already recently seen sizeable development, exceeding its housing growth allocation. Rural and town developments need to include the provision of bungalows, for residents needing to downsize or who need single storey dwellings due to physical health reasons.

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- **Tiffield PC** - We propose that the Strategic plan should focus on the preservation of our green spaces as presented in the ‘Vision’, so that future generations benefit from the continued healthy environment that these spaces enable.
- **Walgrave PC** - Given the level of growth around us the growth within our rural areas should be protected. Emphasis should be given to how the rural environments can be supported to further support the main towns around them.
- **Wappenham PC** - Allow all villages and parishes a small amount of appropriate growth. Preserve in important rural aspect of Northamptonshire villages.
- **Weedon PC** - Weedon Bec is set in a rural area. Our Neighbourhood Plan, which was rejected by the examiner, included several sites where residents would be accepting of development. None were large scale, and no one would want to see a big development foisted on our (or any other) village so that village services become overwhelmed. Small scale development would be welcomed especially if it includes a sizeable proportion of affordable property for families plus bungalows or generously proportioned flats for older/disabled people.
- **Welford PC** - WPC is an enthusiastic supporter of Plan Lead Growth. It was one of the first Councils to prepare and have “Made” a Neighbourhood Plan. We support the premise that: 1. Past levels of rural growth should not be used as a forecast for the future needs where these have been shown to undermine the urban centric special strategy. 2. The focus of growth should be highly concentrated on existing urban areas where essential physical and social infrastructure can be better provided in a sustainable manner. 3. Recent experience has shown that dissipated growth throughout the massive rural area does not create the revenues to sustain infrastructure. 4. The existing JCS sees the housing needs of the rural areas already satisfied to 2029. The change in boundaries does not change that. Therefore, growth in rural areas should respect those targets and made Neighbourhood Plans until that date. Beyond that time growth needs in rural areas can be better judged against the progress made in focusing on urban growth.
- **Welton PC** – No comments supplied
- **Whittlebury PC** - Great care needs to be taken to ensure that any development in rural areas is sustainable. For example, it is no good allowing affordable housing to be built in a village with no local facilities and no public transport services as the residents will be isolated. The majority of growth should be focused on sustainable locations that have local facilities and public transport. We agree with Towcester Town Council that new housing should be provided where the demand is driven by employment growth.
- **Wicken PC** - The WNSP already recognises that rural areas have over-produced in terms of additional dwellings, but that growth may need to slow significantly now that the “low hanging fruit” has been picked. The current identity of rural communities is based on their cultural heritage which should be preserved and celebrated. Rural communities may well become the future

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remote working hubs as digital connectivity is rolled out in these locations. The infrastructure needs become different when fewer individuals need to commute to a place of employment

- **Woodford-Cum-Membris PC** - We agree that the plan to build around existing strong highway infra structure is a good plan, whilst preserving the nature and character of existing marketing, villages, and rural areas.
- **Yardley Gobion PC** - The idea of spreading a little bit of growth evenly across every settlement has some merit. This would keep the relative size between the larger and smaller settlements as it is now. The smaller settlements would not atrophy but may get a welcome boost. Great care needs to be taken to ensure that the local infrastructure can cope, but a policy of 5 or 10% expansion may be worth pursuing. WNC should encourage all parishes to develop a local plan and allow that to do the local allocation with the numbers being set in the Spatial Strategy.

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Question 30: Are there any other spatial options that we should be considering?

- 241 respondents said 'Yes'
- 193 respondents said 'No'
- 343 respondents provided specific comments

Those who responded 'Yes' suggested that the following additional spatial options should be considered, or made other comments:

- Engagement with rural communities is needed including rural health checks.
- There could be a commitment to forests, woods, spinneys, and trees.
- A5 corridor between Towcester and Old Stratford should be made environmental with a focus on major tree planting.
- Emphasis is on new housing - existing housing should also be considered.
- Market Harborough cannot sustain an additional 2,000 houses.
- Wait for the draft Oxford Cambridge Arc Spatial Strategy to be published.
- Less logistics-based employment; attract more 'technical' based employment.
- Consider specific economic requirements for particular sectors or clusters in relation to the spatial strategy and Oxford-Cambridge Arc.
- Concerns regarding loss of farmland and land for sports activities, with impacts on mental health in rural areas.
- Mixed housing delivery is needed.
- Most appropriate spatial strategy is likely to comprise certain elements from all of the spatial options. Strategic warehousing needs assessment should be undertaken.
- Some respondents stated no further development should take place.
- Some respondents expressed support for further growth within the rural areas alongside growth at the main towns.
- Some respondents expressed support for spreading development across the West Northamptonshire area (mainly in and around the existing settlements rather than rural areas), reducing reliance on large sites and considering small sites (or smaller extensions to the existing settlements).
- Some respondents expressed concerns with a reliance upon strategic scale development sites.
- Some respondents referred to the need for grouping/zoning of different uses and separating them.
- Some respondents supported locating new housing near employment areas to reduce the need to travel to work.
- Some respondents referred to their answers under Question 29 regarding rural areas.
- Some respondents referenced the need to take account of changes arising from COVID-19 pandemic with changed working patterns (increased homeworking).
- Several respondents supported locating new developments near existing rail and public transport hubs/connections and improving such connections.

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- Several respondents expressed support for the development of a new settlement as opposed to extensions to existing towns and villages, with reference being made to the example of Mawsley village in North Northamptonshire.
- Several respondents stated that brownfield sites should be prioritised over greenfield development, including within the town centres and existing conurbations with consideration given to higher densities and reuse of vacant/redundant premises.
- Several respondents expressed support for the redevelopment and regeneration of Northampton town centre and as a focus for new development.
- Several respondents expressed support for a greater focus on climate change, with specific reference to support for electric vehicles, sustainable construction, working from home/reducing the need to travel for work and sustainable transport improvements.
- Several respondents suggested further assessment and evidence base work was needed to justify and assess the spatial options/potential development sites, including the AECOM study and that further consultation with residents should be undertaken.
- Several respondents expressed concern that existing infrastructure could not support the proposed levels of development and referred to the need for additional supporting infrastructure to support new developments including woodland, public parkland, allotments, green spaces, swimming pools, hospitals, doctors, dentists, pharmacy, schools, shops, transport (including improvements to existing roads), electric vehicle charging infrastructure. Specific references to the need for a North/South dual carriageway bypass for Towcester and Park and Ride at Northampton.
- Several respondents suggested specific locations for new development (providing supporting information and with some querying the conclusions of the Council site assessments to date). These locations are:
 - 4/5 field areas on Sandy Lane Harpole, next to Larkhall Lane and opposite South View and next to A4500 and the current housing development.
 - Land at Staverton (90 dwellings).
 - Land to the South of the A14 Junction 2, including Harrington Airfield site and the Kelmarsh Estate Land site. New Strategic Settlement for 6,500 – 7,000 houses, 20,000 sqm of employment space and associated infrastructure/services. New Strategic Distribution Centre comprising up to 600,000 sqm of floor space partly on the Harrington Airfield site and on separate adjoining land.
 - Land between Old Stratford and Cosgrove for major development.
 - Land for a dedicated mid-box warehouse (B2/B8 uses) development at land to the south of Junction 1, A14.
 - Silverstone (new town).
 - South West Brackley (Site ID: 5) for circa 2,000 homes and associated infrastructure.

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- Land north of Yardley Road, Yardley Gobion for circa 95 dwellings.
- Spatial Option 1e. Northampton South East for an enlarged allocation providing around 5,000 new dwellings.
- Possible further expansions at West Haddon or Kilsby.
- West Haddon to Guilsborough.
- Mawsley area for the full quota of required housing.
- Sharing development between the villages bordering on the A428 which has access to the A5, M1, and A14.
- New Town at Brackley, with new station on HS2 route.
- Roade- with an additional train station for connecting into Milton Keynes.
- Consider East Haddon, Kilsby, Crick, Barby, West Haddon, Guilsborough for some expansion.
- Urban extension directly adjoining the boundary between Milton Keynes and West Northamptonshire.
- Areas towards Weedon and Newnham.
- Near Flore, near the recently built a £41million extension to the A45.
- A45 Weedon bypass area, Daventry Development Link Road.
- Residential development near the M1, A45, M45 and A14.
- Site 178 (Dallington) for 200 dwellings.
- Site 59 (Weedon Bec)- land parcels should be considered separately.
- Development to south east of Daventry and west of Roade (within the new bypass).
- Land south of Harpole for residential development (3ha).
- Land to the south of Junction 16 of the M1 for logistics use (Site 57).
- Land south of Eldon Way, Crick for employment development.
- Public transport corridor focused development on the A43 south of Towcester – specifically at Silverstone Park (as a destination for employment, education, training, and leisure).
- Cross-boundary employment opportunities provided by nearby major urban areas, including Banbury. Logistics and warehousing close to the strategic road network, including the M40 corridor.
- Future growth at Silverstone Park as the centre of the Silverstone Technology Cluster.
- Land to the South East of Towcester for a new settlement.
- Land North of Mouton situated on either side of Holcot Road (approximately 65ha).
- Foxhill Road close to the northern edge of Long Buckby for residential development.
- Land to the North of Towcester Road, Towcester for employment development.
- Land to the North of the Brackley North SUE (Radstone Fields) for residential development.
- Land adjacent to Elizabeth Woodville School, Stratford Road, Roade for residential development.

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- Land to the North of Greenway, Braunston, Daventry for residential development.
- Land at Hazelbrook, Denton Road, Horton for residential development.
- Land to the North of Towcester Road, Towcester for employment development.
- Land at Staverton Hill Farm, Badby Lane, Staverton for residential development.
- Land Off West Street/Hall Lane, Welford for residential development.
- Land at Upper Heyford, Main Road, Northamptonshire for residential/mixed use development.
- Final Phase, Waterside Way, Bedford Road, Northampton for employment development.
- Blakesley Hill, Greens Norton and High Street, Yardley Gobion for residential development.
- Land south of Market Harborough (Farndon Road, Market Harborough) for residential development.
- Land at Long Barrow, Chipping Warden for residential development.
- Landholding off St Johns Close, Rothersthorpe for residential development.
- Poldermere site, Red House Lane Hannington for employment development.
- Hardwick Road site, Hannington for employment development.
- Quinton Green Business Park for employment development.
- A fair distribution of development throughout the county; concerns regarding impacts on rural settlements.
- Need for development in areas of relative remoteness as far as possible from existing towns and conurbations- consider Cambridgeshire and Norfolk.
- Large developments Northampton and MK. Small expansions with correct need identified for small towns/villages. Support for Site A: Land to the East of Flore and Weedon and Site B: Land to the south and south east of Daventry.
- Sites within the Northampton area boundary; sites within the Northampton Related Development Area ('NRDA'); or sites adjacent to existing employment sites. Sites such as land north of Bedford Road, Northampton (Site ID 61) for up to 24,000 sqm (GEA) of employment floorspace.
- HSGV as a Garden Village settlement to provide over 5,000 dwellings.
- Land to the south of Milton Malsor for employment development is preferable to sites at Junction 15a and 16 of the M1. Combined with Northampton Gateway it has the potential to deliver a significant rail linked strategic warehousing space.
- Respondents also objected to the development at the following locations:
 - In and around Towcester, Brackley and rural villages.

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- Several respondents expressed concerns with sites 38,39 and 40 (Northampton East – Ecton) and suggested they should be removed as an option.

Those who responded ‘No’ made the following key points:

- Level of housing need is overestimated- too much emphasis on the Oxford - Cambridge Arc.
- Keep residents informed.
- Towcester should not be further extended.
- Rural villages should not be developed further.
- Infrastructure should be improved before further new development.
- Choose the options that will have the least impact.
- Consideration to be given to climate change, locating development near sustainable transport links and the use of brownfield sites.
- Concerns raised regarding impacts upon green spaces, wildlife, agriculture, lack of amenities and services, poor transport links and congestion, parking issues, poor quality new housing, impacts on village life.
- Consider the carbon impact of large industrial warehouses particularly along the M1 corridor; carbon offsetting measures should be considered.
- Existing police and fire facilities will not have sufficient capacity to meet development needs. Northamptonshire Police consider that a new hub type facility will be required in the West; would expect developer contributions towards this.
- Northern Towcester, Silverstone and Daventry are ideal for housing and Northampton and Daventry for industrial. Housing in west Northants could be developed on existing developments at Wootton, Duston, Billing/Ecton, Upton and Kislingbury and north of Kingsthorpe.
- Concerns regarding impacts of new development at specific locations including sites 230, 229 and 228, Deanshanger, Silverstone, Towcester, Land south of Market Harborough (2,000 dwellings) near East Farndon, fields between Northampton and Ecton for 1,800 dwellings.
- Concern regarding inclusion of sites within North Northamptonshire Council area (at Ecton) (sites 38, 39 and 40 specifically referenced).

Other comments made by respondents who did not specify ‘yes’ or ‘no’:

- Consider the role of trees in delivering planning objectives.
- Place housing close to employment areas to avoid excess travel and reduce emissions.
- Flood risk is a great issue, particularly in the Ouse catchment.
- Careful consideration to be given to environmental impacts of development at site 230, 229, 228; specific information provided on key issues to consider.
- Affordable housing proportions need to be assessed in line with local needs.
- More single floor dwellings needed with shared ownership opportunities for first time buyers.

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- Historic England would be concerned regarding potential impacts on the scheduled monuments at East Farndon and Little Oxendon deserted medieval village.
- Further information requested on Land to the South of Market Harborough, (2,000 dwellings). Concerns raised regarding this site.
- Concerns raised about further expansion at Bugbrooke including access to schools, mix of housing, community facility needs and sewage infrastructure.
- Keep to the larger already developed conurbations which are close to existing arterial roads of the M1, M4 and M6.
- Concern regarding inclusion of sites at Ecton (sites 38, 39 and 40) and impact upon Neighbourhood Plan.
- Rothersthorpe parish area: development should be in proportion to the housing stock requirement; be sensitive to the rural character of village; take account of other environmental considerations and infrastructure requirements; retain a green belt buffer between the village and the M1 or be in locations that would retain a village hub with a defined buffered boundary (consider land that lies to the west and North West).
- Unsure but perhaps consider growth towards Leicester.
- Stay within the council boundaries and only build where needed.
- Diversify the type of industries catered for e.g., Science/Engineering Parks.
- Concerned previous comments made not noted in relation to Spatial Option 4B. Concerns regarding existing road infrastructure issues; Towcester relief road will be inadequate and cause further congestion on the A43. Concerns regarding impacts of new housing under development in Towcester on existing infrastructure and access to services e.g., doctors, schools, shops, public transport. Difficult to comment on indeterminate line denoting (apparently 4,500) houses.
- See comments to question 29. Whilst the principal towns should deliver the majority of the housing requirement across West Northamptonshire, sustainable growth at rural settlements is important.
- Closer working relations with adjoining authorities is needed on cross boundary developments; these have had a detrimental effect on the Old Stratford roundabout and the existing local communities.
- Spatial objectives seem sound and impressive; difficult part is to follow through and create a legacy of innovative, harm-free solutions that will enhance West Northamptonshire.
- Some respondents suggested a combination of elements from all the spatial options is likely to be required. The distribution of housing growth should be focused at the urban/improved infrastructure areas/main settlement of Northampton followed by other key settlements of Daventry, Brackley and Towcester, but with greater consideration of sites in suitable rural settlements.
- Some respondents suggested the development of Northampton town centre, including old buildings within the centre.
- Some respondents stated the findings of further evidence were needed before commenting further, including the AECOM report, the Oxford to Cambridge Arc special capacity plan, the technical assessments of sites.

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- Some respondents expressed concerns regarding the impacts of new developments and the need for additional infrastructure.
- Several respondents put forward supporting information for specific sites for new development (with some querying the conclusions of the Council site assessments to date), including:
 - Land at Adventure Ways Outdoor Activity Centre for residential development.
 - Land South of Kislingbury Road and adjacent to Campion School, Bugbrooke for residential development.
 - Milton Ham Farm, Towcester Road for residential development.
 - St Peters Way, Northampton for residential development.
 - Former Great Houghton School and Glebe Land, High Street, Great Houghton for residential development.
 - Land adjacent to Ivy House, Hardingtonstone for residential development.
 - Land at Crick Road, Yelvertoft for residential development.
 - Land off School Road, Pattishall for residential development.
 - Land at Hillcroft View, Blakesley for residential development.
 - Land at Beech Lane, Kislingbury for residential development.
 - Former Abattoir Site (Kalvec Limited) and Nursery Buildings, Blisworth for employment/residential/mixed use development.
 - Land off Naseby Road and to the rear of Marecroft, Clipston for residential development.
 - Land at Lingles Farm, West Haddon Road, Ravensthorpe for residential development.
 - Northampton Road, Blisworth for residential development.
 - Land at South East Daventry for employment development.
 - Land at Kilsby for a new settlement (3,300 - 4,000 new homes, a 10ha business park and associated infrastructure/services).
 - Landholding at Willow View, Kislingbury for residential development.
 - Land at Overstone Grange, Moulton, Northampton for residential development (as an extension to the North Northampton SUE).
 - Additional land parcels (193.71ha) to Spatial Option 1E - Northampton South-East for a further 2,500 to 3,500 dwellings.
 - Additional land (37ha) to Spatial Option 1E - Northampton South-East for a further 500-700 dwellings.
 - Land at Hulcote Crop Store, Hulcote for residential development.

Parish/Town Council responses

The following Parish and Town Councils responded ‘Yes’ (should be considering other spatial options):

- **A5 Alliance of Parish Councils** - Identify all sites which are brownfield before any greenfield sites. Climate change should prompt a reassessment of the proximity of places of employment to the residential location of its workforce. For those who cannot work remotely, journeys should be on enhanced, integrated public transport with a greater reliance on working within walking/cycling distance of one’s home. The spatial options should prefer

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locations with existing rail and other transport links. The majority of houses built should be classified as “affordable” at the point of sale. Site 36 has been dropped from this consultation whilst Northampton has the infrastructure to support the development; should be included as an option.

- **Braunston PC** - sites 15 and 17 to the east and south east of Daventry should be reconsidered, with sizes reduced to protect the scheduled monuments. The sites are nearer to Long Buckby station than Spatial Option 2a and would be nearer to any new Daventry Parkway station developed in the Weedon area.
- **Brixworth PC** - Need to see the AECOM report and the technical assessments of the sites before commenting further. Affordable housing proportions need to be assessed in line with local needs. More single floor dwellings needed with shared ownership opportunities for first time buyers.
- **Cogenhoe and Whiston PC** - Protection of green spaces is essential.
- **Hinton-in-the-Hedges PC** - the document misses out on improving what is already here. Focuses on ‘new’ development and ignores the current population wants.
- **Overstone PC** - The £40 million A45 link road which bypasses Flore should have more development especially to the North of the bypass.
- **Tiffield PC** - In a period when the UK hosts COP26 it is entirely wrong that West Northamptonshire should present a Strategic Plan that does not adequately reflect the need to create a Zero Carbon County. To minimise environmental impact and embedded carbon the plan must examine spatial options that exist within the confines of current conurbations and small towns.
- **Wicken PC** - The spatial options must identify all sites which are brownfield before any greenfield sites are selected. The impact of climate change should prompt a reassessment of the proximity of places of employment to the residential location of its workforce. For those who cannot work remotely, journeys should be on enhanced, integrated public transport with a greater reliance on working within walking/cycling distance of one’s home. The spatial options should prefer locations with existing rail and other transport links.
WNC should pursue a policy of the majority of houses built being classified as “affordable” at the point of sale.

The following Parish and Town Councils responded ‘No’ (should not be considering other spatial options):

- **Blisworth PC** - There are limited opportunities for growth without impacting the countryside and local infrastructure.
- **Woodford-Cum-Membis PC** - The provision of a completely new settlement is un-realistic in terms of providing the infrastructure to develop a whole new town or large village, particularly when there are suitable sites, as identified which will provide for housing, employment and industrial needs well into the future. Consideration should be given to ensuring that all un-used housing and available brown sites are used.

The following Parish Councils did not specify ‘yes’ or ‘no’:

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- **Ecton PC** - population growth in Northants is outstripping national growth. If the trend continues the ‘Green and Clean’ attributes and ‘distinctive rural landscape’ will come under unsustainable pressure.
- **Silverstone PC** - More thought must be given to the choice sites and not be driven by developers. Neighbourhood plans and careful surveying should identify suitable locations for appropriate development.
- **Wootton PC** - The potential of the connecting of communities, villages, and towns physically by new roads or new cycle or pedestrian ways should be established. Cycle routes within and across towns should be improved and created

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Question 31: Are there any other comments you wish to make at this stage?

529 respondents submitted comments

Comments are grouped by broad subject areas below for ease of reference.

General Comments

- Outline planning should remain as close to what is outlined as possible (reference made to Overstone Leys development).
- Concerned with two tier approach to plan making; allocating only very large sites now will lead to delayed housing delivery. Include medium-sized sites.
- The Joint Core Strategy should not be a fixed starting point for a new Strategic Plan; should allow questioning of existing allocations of land.
- Remove the Council from the Oxford-Cambridge Arc.
- The Council should negotiate S106 agreements and hold developers to these conditions; the Council has the responsibility to implement the measures.
- Some existing businesses are bussing employees' long distances; should be required to offset the environmental impact of long-distance commuting.
- The plan should be coherent with North Northamptonshire plans.
- A review of the West Northamptonshire Joint Core Strategy is overdue; the strategic plan should be kept on course for earliest possible adoption.
- The Duty to Co-operate remains in force; strategic planning matters must feature in regular engagement across local authority boundaries and should seek to be consistent on the proposed Plan periods.
- Homes England will seek to support growth and increase the rate of housing delivery through acquisition, development, infrastructure, investment, new settlement/garden communities and enabling activities as appropriate.
- Do not make the same mistakes as the South Northampton Local Plan (2).
- Farmland where there are working farms should be protected.
- Some respondents expressed general support for the approach to producing the emerging Spatial Options and its content/scope.
- Some respondents supported references to the Oxford/Cambridge Arc. Need to physically join it through developing transport, housing, and connectivity. Growth in the south of the county reliant upon alignment with the Arc.
- Some respondents supported the 2050 timescale.
- Some respondents stated the impact upon existing communities and the needs of existing residents needed further consideration.
- Some respondents referred to the Government's 'Levelling Up' agenda; this should be taken account of.
- Some respondents expressed the view that the plan needed to be more specific on how some of the objectives would be achieved.
- Some respondents stated the plans should have a process of regular re-assessment and monitoring to make sure the objectives are being achieved.
- Some respondents expressed concerns about the lack of quality design in new developments; new buildings should be an enhancement to the area (use

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- local conservation areas and traditional Northamptonshire styles to inform schemes).
- Some respondents stated the document does not have a clear/strong vision; the vision should link to other council initiatives. Consider delay in the consultation to develop a vision for the area from which spatial options/spatial strategy can be identified.
 - Several respondents referred to taking account of the effects of the COVID-19 pandemic on the economy and home/work patterns.
 - Several respondents stated the importance of environmental and climate change considerations (including biodiversity gain) and support for the carbon neutral by 2030 pledge. Concerned the plan will not achieve climate change objectives and Net Zero target; should align with the Council's Climate Change Strategy. Reference made to examples of logistics and industry developments along the M1 corridor and elsewhere (e.g., Buckton Fields urban extension). Reference made to the need for new developments to incorporate sustainable design features e.g., solar panels, electric vehicle charging points, wildlife areas. Should specifically refer to the need to reduce carbon emissions. Objective 1 overlooks the role of the natural environment in building resilience to climate change. Biodiversity Net Gain approach/policy should be developed further; set a target (noting 10% will be the mandatory minimum- guidance provided).
 - Several respondents stated the plan does not meet legal guidelines and it fails to embrace the sustainable development requirements of the National Planning Policy Framework; does not take account of the effects of the COVID-19 pandemic; there is inappropriate emphasis on economic growth and 'business as usual' development; it lacks a coherent strategy for the proposed sites (the locations appear to be driven by developer demand).
 - Several respondents stated the plans were against the wishes of residents/communities and existing objections to local plans.

Consultation Documents and Process Comments

- If additional sites come forward the consultation will need to be repeated.
- Request consultation extended and advertised on local radio/in the press.
- Support for the structure of the Consultation Document and its brevity.
- The housing requirements for Northampton are poorly presented; cannot understand the figures.
- Additional staff/information needed at the consultation events.
- Some respondents expressed the view that decisions had already been made/ building work started before the consultations.
- Some respondents stated there wasn't enough detail to comment on.
- Some respondents stated that the mapping within the document was poor quality/poorly presented. Further detail should be included e.g., relationship to other sites/surrounding areas, woodland, historic sites, topography, clearer base mapping, and a clearer 'key'. Mapping should show all sites nearby one another on single map to give a better perspective.

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- Several respondents stated that notifications/communication/advertising of the consultation was not adequate.
- Several respondents stated that the format/length/style of the consultation document, accompanying documents and questionnaire may deter people from responding. Information should be presented more clearly/more accessible/be more user friendly/in plain English/less use of jargon and abbreviations. Summaries of the accompanying documents should be provided. Access to the consultation via the website URL was difficult.
- Several respondents expressed concerns regarding the questionnaire including that the use of Yes/No options was not always appropriate; it leads the reader to answer ‘yes’; some questions are ‘loaded’; the length deters people responding, it is not user friendly; does not adhere to web accessibility criteria; the requirement to register first may deter people.
- Several respondents stated that there should be more consultation and engagement with residents and communities throughout the plan process/before the plan is taken further (including in specific areas affected by potential new developments and neighbouring areas outside West Northants). Some concerns that residents, local councillors, and parish councils have not been consulted adequately and have not been involved in the plan or in identifying potential development sites to date (including in specific areas affected by potential new developments and neighbouring areas outside West Northants). Respondents suggested the use of ‘citizens’ assemblies; taking account of that not everyone has social media/actively looks at the Council website; using sports clubs/gyms to engage younger people.

Evidence Base Comments

- Welcome further Duty to Co-operate discussions and the sharing of a Duty to Co-operate Paper to inform the next stages.
- Request confirmation that screening for the need for a Habitat Regulations Assessment has been undertaken.
- Any development proposals within the inundation zone of a reservoir dam could adversely alter the risk assessment for the reservoir. Detailed information and updated breach models needed to consider consequences of dam failure (should be part of the Flood Risk Assessment). The urbanisation of catchments is a risk; a change to the modelled hydrograph inflows to a reservoir could increase predicted water levels (mitigation required).
- The sites should be subject to Land Contamination Assessment in accordance with national policy and the Environment Agency Land contamination risk management (LCRM) guidance. Guidance links provided.
- Air quality monitoring is inadequate.
- The sustainability appraisal should be updated and extended to consider the options assessed in the AECOM new settlements study (once published).
- Traffic monitoring must take place at peak times of the day and year.
- Significant further heritage impact assessment required before the sites can be fully assessed; ensure Conservation Officers and Archaeological Advisors have been consulted. Guidance links provided.

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- Query what research has been done on empty/substandard properties.
- There is no urban capacity study.
- Natural England is working with the Council on evidence to inform revision of the Upper Nene Valley Gravel Pits SPA Supplementary Planning Document and establish a mitigation strategy. Also investigating Functionally Linked Land for Golden Plover and Lapwing. Will expect sufficient evidence to be provided to justify the site selection process and to ensure sites of least environmental value are selected. Reference made to existing sources of information and guidance on areas of environmental value/protected sites and evidence base would expect to see prepared/used to support the plan.
- An up-to-date assessment of sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision is needed.
- Milton Keynes Council would like to participate in any strategic warehousing needs study; see also SEMLEP offer on joint study.
- Some respondents expressed concern that the Sustainability Appraisal and Strategic Environmental Assessment only test site options; does not test the Local Plan objectives or spatial strategy options (including reasonable alternatives). Does not consider different combinations of spatial strategies (reference made to the West of England JCS plan from 2018/19). The high-level assessment should be updated based on forthcoming evidence base (for site specific assessments).
- Several respondents stated that the consultation should be delayed allowing the report on new settlements to be published (AECOM report) and a study on strategic warehousing needs to be undertaken.
- Several respondents stated the consultation should be delayed to wait for the draft Oxford Cambridge Arc Spatial Strategy to be published. This will become national planning guidance and take precedence; not taking it into account may mean the plan will need to be revisited or face legal challenge. The timetable does not have any mechanism to check draft proposals against this emerging policy.

Housing and Employment Needs/Requirements Comments

- The Standard Method housing requirement should be considered as a minimum.
- The estimate of housing needs is a model and unexplained in the paper.
- There are errors in the Housing and Economic Needs Assessment (HENNA) which need to be corrected.
- More than one scenario on employment needs and housing needs should have been presented with flexible options for implementation.
- Estimates of population growth may be understated.
- HENNA should be updated to reflect strategic trend changes in the logistics market. Indicates a need to allocate further land (supporting evidence submitted). Strategic warehousing needs should be considered by this plan.
- Ensure that houses are well built and have a variety of sizes and styles.

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- There is insufficient consideration of the effects of Brexit on economic growth.
- Relying on landowners/agents to propose employment sites results in bias towards the logistics industry. Strategy should be to decide what kind of new employment is needed and deliver this.
- Add an objective to radically improve existing housing.
- Query the approach/assumptions of the HENA and data used; consider that land availability, not need, is driving the strategy.
- A higher approach to housing need that would support the level of job growth for the area should be adopted.
- The HENA should be reviewed and updated following the Government's Oxford-Cambridge Arc Spatial Framework consultations.
- The HENA does not fully acknowledge the Silverstone Technology Cluster and its benefits to the local and regional economy.
- Concerned about the speculative building of warehousing/office space.
- Some respondents stated there is shortage of social/affordable housing and the plan does not address affordable housing; houses will be too expensive for local young people.
- Some respondents asked for clarification what is affordable housing as current housing prices are very high.
- Some respondents stated that no further building should take place in the area and the evidence was not there to support further development.
- Some respondents stated that based on ONS statistics the overall number of new dwellings should only be 23,870 and South Northamptonshire's housing need is 6,317.
- Some respondents stated that the data appears to show that fewer new houses are required/more are being planned for than what is needed.
- Several respondents expressed concerns about the scale of development proposed and focus on housing/economic growth, rather than environmental/climate change matters.
- Several respondents expressed concerns with the focus on warehousing/logistics developments (and their environmental impacts) and lower paid/skilled jobs being provided. Higher value/paid/skilled jobs should be sought. Concerns that the plan does not address economic requirements for other sectors/clusters of business activity, including high performance and technology sector. Partners from Manufacturing, Information Technology, Health Care, Education, and others should consider ways to encourage new jobs with the minimum land footprint and reduced transportation needs.
Reference made to Silverstone Park, Silverstone Technology Cluster, and the technology college.

Infrastructure Comments

- Minimum of 30% of development land should be left as green public space.
- Work to get a single infrastructure-led strategic plan.

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- Consider the development land or infrastructure pressures that the Cambridge Oxford Arc may place on the area; set out how the emerging Arc growth may be accommodated.
- Infrastructure should not be limited to the needs of new residents. Existing communities must benefit from new developments.
- Why include new roundabouts with new developments; consider flyovers.
- Maximise the use of pre-existing infrastructure such as existing dual carriageways and motorways when deciding on site locations.
- New developments should incorporate sufficient and high-quality greenspace/blue infrastructure, recognising its multifunctional and contribution to policy delivery and strategic outcomes (e.g., supporting climate change adaptation and healthy communities etc). Reference made to Natural England's supporting guidance/standards/resources available.
- Concerned that infrastructure won't be provided in reality; reference made to current developments at Collingtree Park, Hampton Green and St George's Fields which have no facilities.
- Concerned about impacts upon Public Rights of Way; many have been cut through where new major trunk roads have been created e.g., A43, A14. Should have a plan to not allow public rights of way to become inaccessible or dangerous/difficult to navigate and improve links.
- The water supply resource issue is being ignored in strategic planning policy. Reference made to Anglian Water's Water Resource Management Plan and the Anglian Water Region being classified as an 'area of serious water stress'. Concerned that Anglian Water is not responding to consultations adequately; independent report needed on water resources.
- Look at Overstone Leys and the lack of roads west to east; £41Million should have been spent where 4,000 homes were planned.
- Clarity needed on the status/plan for the Northampton Northern Orbital route.
- English Regional Transport Association wish to see old railway track beds protected and links reopened (specific locations referenced). Reference made to engineering study for Northampton – Bedford link. Range of benefits for Northampton identified. Support new stations/halts at Watermills (new University campus), Brackmills (industrial estate) and the old Bridge Street station. Re-opening of the Great Central Main Line would have number of benefits; connections could be made for Daventry. A new station should be built at Weedon on the West Coast Main Line close to Daventry International Rail freight Terminal. Grand Union Canal towpath should be upgraded.
- National Grid identify one or more National Grid assets within the Plan area (details provided). Guidance provided on development close to assets. Request a plan policy that respects existing site constraints including utilities.
- National Highways provide high level analysis of the spatial options; each of the options identified are likely to have a varying level of impact on the Strategic Road Network, leading to potential implications at key junctions and impacts on their operation. The cumulative impacts of sites should be considered. Specific reference made to Site 2 for 1,500 dwellings located in close proximity to the A5; Site 7 for 470 dwellings located adjacent the A43;

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Site 23 for 90ha of employment located adjacent the M1; Site 25 for 4,000 dwellings located adjacent the A14; Site 33 for 2,000 dwellings located adjacent the A43; Site 35 for 35ha of employment located adjacent the M1; Site 47 for 2,800 dwellings located adjacent the A5; Site 43 for 900 dwellings located adjacent the M1; Site 48 for 3,255 dwellings located adjacent the A5.

- Network Rail is working with stakeholders on the current freight developments (DIRFT expansion and the Gateway project); promotes the benefits of transporting freight by rail. Working with West Midlands Rail Executive, England's Economic Heartland, and rail industry partners to investigate ways to integrate local train services in the area. Continuing the development of the England's Economic Heartland project. Working on optimising utilisation of capacity on the West Coast Main Line.
- Some respondents stated that the current road network is up to capacity (heavy congestions/traffic delays/pollution already) and solutions are needed before more development. Reference made to the A5 and specific areas in the north and north-eastern area, and potential impacts of new settlements at Towcester and Old Stratford. Analysis to understand the impacts is needed.
- Several respondents stated that new developments need appropriate infrastructure provision – schools, doctors, hospitals leisure facilities, electric vehicle charging points, energy, transport links, sewage network, water provision. Concerned about the impact upon existing infrastructure across the area and upon existing services within villages/that villages do not have the capacity to expand these existing services. Investment needed in services in existing areas before further development take place.
- Several respondents expressed support for active travel and reduced vehicle use. Support for more/enhanced cycle routes, and public transport improvements. Concerned about lack of reference to public transport in the plan. Concerned about lack of understanding on cycling infrastructure/use. Link up with the Public Transport Strategy and the Local Cycling and Walking Infrastructure Plan. Lack of access to adequate cycling infrastructure in Northampton town. There is no plan to develop green infrastructure to take the place of car/lorry transport.

Spatial/Development Strategy Comments

The following comments regarding the overall spatial/development strategy were received. Site/location specific comments are summarised in the subsequent section.

- Consider locating development in new and expanded settlements directly related to existing and potential high quality public transport corridors.
- Locate development where there is opportunity for sustainable modes of transport to be utilised rather than sole dependence on private vehicle.
- Define a clear rural boundary between Milton Keynes and the West Northants border to prevent conurbation and ribbon development.
- Remaining villages on Old Stratford bounds should remain as Green Belt.
- Bias towards South Northants for extra development is disproportionate.

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- Some respondents suggested removal of a ‘zoning’ approach (home and work in separate places) and developing mixed-use neighbourhoods (reference made to 15-minute neighbourhood). Locate employment/housing nearby one another/near town centres and services to reduce commuting/maximise public transport use.
- Some respondents supported development on sustainable urban extensions.
- Some respondents expressed concerns with the use of sustainable urban extensions on the edge of existing towns/strategic growth sites.
- Some respondents supported consideration of new settlements.
- Some respondents expressed concerns with new settlements.
- Several respondents expressed concern that the approach was developer-led/site-led/piecemeal and based on the ‘Call for Sites’ only (rather than being an overall strategy for development). Sites will not deliver the vision.
- Several respondents supported prioritisation of brownfield sites within existing settlements; green spaces to be built upon last.
- Several respondents stated developments should be focused on improving the existing urban areas/towns and their infrastructure rather than rural areas.
- Several respondents expressed concerns with the loss of countryside/rural areas to new developments and adverse impacts upon the rural nature/character of the authority/villages; loss of wildlife; mental health; increased traffic; increased pollution; losing the character and heritage of villages. Buffers should be used to maintain the individuality of existing settlements and for footpaths, bridleways etc to retain their rural feel.
- Several respondents stated the needs of the rural areas require further consideration and the individual nature of rural villages should be recognised. Support for sustainable/appropriate growth in the rural areas that complements the existing/ character/have appropriate infrastructure. Direct growth to a wider range of smaller sites and villages/spread development across villages to meet needs. Consider regeneration needs of villages. Plan focuses on Northampton/urban conurbation and not rural communities. Include an enabling policy to facilitate delivery of housing sites in rural areas (policy wording/criteria suggested).

Site/Area Specific Comments

In addition to the spatial strategy comments above, several respondents suggested or supported specific locations for new development (providing supporting information and with some querying the conclusions of the Council site assessments to date). These locations are:

- A14 east-west corridor: would recognize the role the whole of West Northants can play in the Oxford-Cambridge Arc and would be consistent with the Corporate Plan (2021-25). Support strategic development in the north of the Council’s area, including the potential for a new sustainable community.
- Site ID 16 (Daventry West) appropriate for residential development; will provide technical assessments to ensure robust assessment within the Sustainability Appraisal.

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- Site ID 37 (Hardingstone Rise) should be assessed more positively assessed in the Sustainability Appraisal.
- Site ID 59 (Weedon Bec): Strategic Land Availability Assessment (SLAA) analysis is unreasonable, and corrections are needed/additional evidence should be considered.
- Site ID 89 could deliver more dwellings and link to MRT corridor.
- Site ID 99 (DIRFT 4) appropriate for residential development; will provide technical assessments to ensure robust assessment within the Sustainability Appraisal.
- Site ID 40 appropriate for residential development (within North Northamptonshire but wish to work with both Councils).
- Site ID 247 for residential development- could include strategic open space and link to MRT corridor.
- Deanshanger: upgrade infrastructure to expand it into a town. Support for new development in vicinity.
- Drayton Gate Farm, north of the A45 (Braunston Road), Daventry appropriate for employment development.
- Eco-park@Daventry Interchange: spatial option 3b offers the best potential for meeting local employment needs.
- Ecton Brook: proposed development here is not included- why?
- Knotwood: add ecovillage by the A508/A5 roundabout (preserve green space/wildlife corridors between villages of Wicken, Furtho and Pottersbury).
- Land adjacent to Puxley Road, Deanshanger (Site ID 112) for residential development; sites should be considered separately.
- Land at Collins Farm, Flore (Site ID 21) comments on the SLAA assessment; smaller parcel of land should be re-assessed.
- Land at Holly Lodge (Site ID 29 and part of Spatial Option 1c) for development.
- Land at Hillcroft View, Blakesley for residential development.
- Land east and west of Junction 18, M1 (Site ID 133) for employment development; query Sustainability Appraisal findings.
- Land at Middleton Cheney for development.
- Land at Northampton Road, Brixworth (Site ID 112) for residential development; sites should be considered separately.
- Land at Station Road, Brixworth (Site ID 112) for residential development; sites should be considered separately.
- Land East of Ashby Road, Daventry (Site ID 98) for residential development; comments on SLAA analysis.
- Land east of Welton Lane, Daventry (Site ID 100) for residential development; comments on SLAA analysis.
- Land north of Yardley Road, Yardley Gobion for residential development.
- Land off A428 Harlestone Road/York Way at Dallington for residential development.
- Land off Wicken Road, Deanshanger (Site ID 112) for residential development; sites should be considered separately.

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- Land on the north-east side of Holly Lodge Drive, Moulton Park, Northampton for residential development; comments on SLAA analysis.
- Land south-west of Crick (Site ID 14) for residential development; query SLAA analysis of the site. A smaller scale of development can be considered.
- Land to the South and West of Pitsford Road, Moulton appropriate for residential development (as part of a wider allocation ‘Northampton North - West of Moulton’ (spatial option 1c)).
- Land to the west of the existing settlement at Harpole for development.
- Land West of A5 and North of Towcester Road, Towcester for employment development.
- Middlemore Farm, west of the A361, Daventry for residential development.
- Milton Keynes: Option 4b and Option 5b align with possible future long-term development locations within the Milton Keynes Strategy for 2050; broadly supported but Councils to work together to ensure the potential impact of the allocations are assessed and mitigated, particularly in relation to infrastructure. New employment land should not be at a scale which competes with Central Milton Keynes as a major office/employment centre.
- Ministry of Defence sites at Yardley Training Estate and Kelmarsh storage depot: should recognise these are of strategic military importance and operational development should be supported. Consider ‘agent of change’ principle. Recognise their brownfield status and potential for sites to be declared surplus. Suggested policy wording provided.
- Northampton town: Several respondents stated the opportunities for development within the town should be considered, including former retail/industrial sites, building up and densification. Site options have been dropped from the SLAA and this consultation. Only 10% of the growth is toward Northampton. The recent bid for Northampton city status is not supported by any proposals in the spatial options. Needs redevelopment/regeneration.
- Phase 2 Shacks Barn, Whittlebury for employment development.
- Rothersthorpe Village: Support residential use of site 80 (with appropriate access, infrastructure, and design).
- Silverstone Park and Silverstone Circuit: should maintain the strategic policy support within the adopted West Northamptonshire Joint Core Strategy for further development/redevelopment.
- University of Northampton’s Waterside Campus: importance should be recognised. The University’s former Avenue and Park Campuses are proposed for residential development.

In addition to the spatial strategy comments above, several respondents queried the appropriateness/objection to specific locations or areas for new development (providing supporting information and with some querying the conclusions of the Council site assessments as set out in the Strategic Land Availability Assessment (SLAA) and/or Sustainability Appraisal). These locations/areas are:

- SLAA Site 210: further development on Lower Ecton Lane, Northampton needs to be accompanied by traffic measures (details provided).

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- SLAA Sites 221, 229 and 219 (all on the edge of Northampton): would decimate green spaces. Query the Sustainability Appraisal findings.
- Spatial Option 1: against further expansion of Northampton to the east due to infrastructure concerns; merging of Wellingborough with Northampton; impacts upon the Nene Valley. Expansion better centred on the west, as the proximity of the M1 means that expansion here spoils less countryside.
- Spatial Option 1a - Northampton North – North of Buckton Fields and Northampton Northern Orbital Route (NNOR): concerned about potential impact on the Brampton Valley Way (BVW) and the Northampton and Lamport Railway (NLR). The NLR organisation is expanding the existing heritage railway operation in Northamptonshire (extensions currently to the south and following that to the north- details provided). Wish to minimise potential for changes to existing infrastructure by feeding into the design and crossing locations of Option 1a/NNOR.
- Spatial Option 3a and 3b (Area at M1 at Junction 18) including SLAA Site ID 99 and 133: several respondents objected. The area has seen substantial development through DIRFT and housing developments. Concerned about increases in pollution and congestion; loss of Green Belt agricultural land; loss of character of the area; significant environmental impacts. Reference made to visual impact of development of elevated land. More appropriate sites are available in proximity to Daventry (detailed information provided). Has already adversely impacted Crick; would impact Yelverloft and Lilbourne. No evidence to support the scale of expansion at DIRFT (see also comments related to impacts upon Kilsby and DIRFT expansion below).
- Spatial Options 4a, 4b: concerns regarding transport infrastructure (A5 and Old Stratford roundabout already congested); flooding/drainage.
- Spatial Options 5a: concerns regarding transport infrastructure, flooding, and drainage
- Spatial Option 5b: several respondents objected due to concerns regarding education, medical, emergency services capacity and transport infrastructure; flooding/drainage; impacts upon the environment; pollution; road safety (crossing A5); impacts upon existing residents; loss of agricultural land; green and blue infrastructure; loss of village life; coalescence between villages; loss of rural/village character and loss of individual villages. Would become a dormitory estate for Milton Keynes. Scale of development inconsistent with local needs. No development without the full co-operation of Milton Keynes Council to jointly demonstrate how the infrastructure and services will be developed and improved. Include better/safer cycle links to local villages e.g., Pottersbury and Yardley Gobion (see also Cosgrove, Deanshanger and Potterspury comments below).
- A5 and A508 developments: concerns regarding traffic and road safety; Yardley junction would need improvements.
- A5 area: there should be no more residential or business development alongside the A5, or in such a location that will draw more traffic along this road, until the road network is updated to take traffic away from Towcester, and all other residential or community areas.

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- Brackley: developments to date have left Brackley minus infrastructure befitting a town its size. The High street should remain the focus of the Town. Development to the north will require new shop hubs and services. Improved road, footpath and cycle infrastructure is needed across the town. Consider electric bus service. Consider infrastructure needs and access to them including parking, healthcare, education, green spaces and play areas.
- Braunston: would be ruined by the proposed plans.
- Cosgrove: several respondents objected to size and scale of development in this area due to concerns regarding climate change, biodiversity, traffic, pollution, loss of access to leisure opportunities. Reference made to existing issues including traffic.
- Crick: concerned about loss of green spaces, traffic congestion, pollution, crime.
- North side of Daventry: Neighbourhood plans have been made and development has already impacted disproportionately.
- Deanshanger: several respondents objected as it would no longer be a village if the Old Stratford development took place. Should remain a village (see also Spatial Option 5b comments). Recent developments taken place with no village access improvement; this should be a priority before any further development takes place.
- DIRFT expansion: if takes place the infrastructure should be rethought e.g., the junction 18 and the A14 and landscaping should be scale appropriate.
- East Farndon (land south of Market Harborough): several respondents objected. Further large-scale development will adversely impact the character of the settlements (Market Harborough and East Farndon- reference to Lubenham also made). Concerns on infrastructure capacity; traffic issues; flooding issues; reduced separation between East Farndon and Market Harborough (East Farndon ‘consumed’ by Market Harborough); pollution; lack of public transport; potential impact of development on locally significant historic parklands to the south-west of Market Harborough (Thorpe Lubenham Hall and Marston Trussell Hall). Market Harborough town infrastructure and services have not improved with recent developments. Proposals are contrary to existing local plan policies. Concerns regarding potential changes to local authority boundaries because of the development. Support for not allocating the site; Harborough District Council is beginning to prepare a new local plan and will maintain dialogue under the Duty to Cooperate.
- East of Northampton / Ecton: should not be developed further (reference also made to Ecton Brook and Rectory Farm). Several respondents objected to SLAA sites 38, 39 and 40. Concerns regarding loss of open and green spaces (including pocket and linear parks); loss of Green Belt land (should be protected); wildlife losses; traffic issues on the A4500 and other roads (existing issues being exacerbated); school capacity; medical facilities capacity; pollution increases; impacts on local heritage assets/conservation area; impacts upon views; impacts upon local environment overall (including the river and brook); flooding/drainage issues; coalescence of Ecton with Northampton. The plan should not be considering sites outside its boundaries

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and they should be removed as options. Regard should be had to the Ecton Neighbourhood Plan; the sites are contrary to the plan. Council Tax from developments on these sites will go to North Northamptonshire Council.

- Kilsby (warehousing development): several respondents objected. Any DIRFT expansion would adversely affect residents and the village. Reference made to visual impact of development of elevated land and infrastructure concerns. Concerns regarding traffic; increased noise and light pollution (HGV traffic has already increased); loss of greenfield countryside; impact upon heritage assets (Kilsby Tunnel); loss of rural/village life. Would not provide significant number of jobs/current developments are automated with minimal personnel. Kilsby Neighbourhood Plan consulted everyone living in the village.
- Land North West of Nasmyth Road Daventry: close to a railway cutting which must be protected for possible future use as a railway.
- Long Buckby: several respondents objected to development here. The housing developments do not contribute to the quality of our lives- poor quality housing. Concerns on wildlife losses; loss of village rural nature; impacts upon conservation area; impacts on infrastructure (already at capacity). A 'new settlement' here is not viable; it is not a new and separate settlement.
- M1 and A43: concerned will become corridor of warehousing with adverse impacts on landscape, character of villages, road infrastructure/traffic.
- Martins Yard Development, Northampton: should not go ahead as its close to the main railway line; could obliterate the old track-bed of the old Northampton - Bedford railway.
- Moulton: should work with Moulton College and adjacent landowners to create a cycle/ walking access route.
- North of Daventry towards Braunston: object to development here.
- North of Moulton: development options outside of the specific A43 SUE proposals- Planning Inspector has found them not justified. This has been omitted from the consultation document.
- North of Northampton: development is dependent on the Northern Relief Road but this, alone, will not be sufficient to deliver these areas.
- Northampton Northern Orbital Road: will shift traffic rather than remove it and will obliterate the track-bed of the old Northampton-Market Harborough railway line (wish to see re-opened).
- Potterspury: several respondents objected to development. Reference made to existing infrastructure issues e.g., capacity of schools, health, road network- further development would exacerbate issues. Concern at loss of rural character, green space, wildlife.
- Rothersthorpe: several respondents objected to SLAA sites 80, 228, 229, 230 & 330 (detailed comments made with reference to specific local issues). Consider the damage to historical sites/heritage assets; conservation area; landscape value; wildlife (including protected species); rural paths; the Grand Union Northampton Arm canal; increased flooding (exacerbating existing flooding issues); negative visual impacts; loss of amenity; increased noise pollution; loss of village community/identity (loss of quietness); loss of

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agricultural land; negative impacts of additional traffic. Site 228 will only deliver small number of jobs. Site 229 provides green barrier to the M1 motorway. Rothersthorpe lacks existing services/infrastructure capacity (issues will be exacerbated). It is too far away from the main employment areas for those working in Northampton (for housing). Buildings would be out of keeping with the rural nature of the village and its surroundings; consideration should be given to bunding and landscaping that minimises the impact if development proceeds. Green area separation from Northampton should be maintained.

- St. James Inner Relief Road Northampton: will shift traffic rather than remove it and will obliterate the old track-bed of the old Northampton - Bedford railway. Must be provision for a potential level crossing where the road crosses the old track-bed.
- Towcester: several respondents objected to development here. Should not be further extended- making the rural town into a polluted large town/small city. Road network is not fit for purpose (including the new relief road). Concerns regarding environmental impact; loss of rural/village character; loss of agricultural land; impact upon heritage assets/historic character; impact on resident's wellbeing; infrastructure capacity and the need for improvements e.g., schools, medical facilities, sports facilities, and traffic (need a dual carriageway bypass around the town before further development). Towcester farming community and its greenspaces should be protected and supported. Concern about development from north west Milton Keynes stretching through to Towcester and impacts on Towcester infrastructure. Development is over and above what is required in the area. Current developments not providing affordable housing; jobs; sustainable transport. Concerned plans would locate employment development north of Towcester whilst there is a development of housing to the south (sustainability issues).
- Towcester racecourse: object to development. It adds to the county's quality of life; attracts visitors; is an area of open grade 2 listed parklands and open countryside containing listed buildings and heritage sites.
- Whittlebury: concerns about traffic through village; would be exacerbated by further developments. Towcester bypass will not be an attractive alternative.
- Yelvertoft: concerned about impacts on its rural setting.

Parish/Town Council responses

The following comments were made:

- **A5 Alliance of Parish Councils** - Concerned with the basis on which the consultation is taking place and the timing of the consultation. Plan fails to address key issues for the proposals. Its methodology of assessing suitable sites is no longer fit for purpose. The pandemic has changed patterns of working which this plan fails to consider. Creating new communities that lack any infrastructure to support them will increase in carbon emissions through greater use of private vehicles. Infrastructure must be in place before proceeding with housing expansion and the ability of developers to adapt a

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proposal based on viability at a later stage should be withdrawn. The plan must be re-written to demonstrate precise steps as to how each proposed site will ensure the Council reaches net-zero carbon emissions by 2030. The use of brownfield sites is not discussed. Does not consider the needs of Northampton to grow “upwards” rather than “outwards”. Greenfield locations at the scale proposed should be the last resort. The Oxford-Cambridge Arc plan has not been published for consultation; there is a risk that the plan will be challenged because it did not consider current national policy which will take precedent over the WNC plan. Disagree with the housing projection; housing need is inflated using a weighting applied to provide affordability (should instead require a higher percentage of affordable housing). and figures on population growth may differ from those in the Oxford-Cambridge Arc plan. It should be re-written to reflect climate change commitments and re-selection of sites that are near employment opportunities and that can be accessed by sustainable transport. The Council should delay this consultation/withdraw the plan and take the approach by Milton Keynes council to develop a vision for the area from which spatial options in planning terms can be worked through. It should wait for the draft Oxford Cambridge Arc Spatial Strategy to be published; for work commissioned on new settlement options to be published; and its review of warehousing needs. The possibilities for development in Northampton town should be considered; these have been dropped from the SLAA and this consultation.

- **Billing Parish Council** - Comments made on Sites 38, 39 and 40 (Northampton East – Ecton). The Ecton Neighbourhood Development Plan has been adopted. The sites are all contained within the boundaries of the Ecton Neighbourhood Development Plan. Regard should be had to the Neighbourhood Plan; specific reference to paragraphs 5.5.4 and Policy 9 in respect of landscape character and maintaining the separate identity of Ecton village. Billing Parish and Rectory Farm form part of the eastern boundary of Northampton and the areas covered by these sites are extremely important to the local area as ‘green belts’. Development is contrary to the required climate change actions and for ‘clean air’. Concerned about the loss of green spaces for healthy living/mental health benefits. Concerned about the loss of wildlife species and a green wildlife corridor (Pocket Park in Rectory Farm and the Linear Park in Ecton Brook could both be severely damaged). Vehicular movements would be along a narrow country lane (Ecton Lane) and then predominately in a westerly direction heading for the motorway network via junctions 15, 15A and 16 all serving Northampton. Both the A4500 and the A45, currently experiencing problems particularly at peak traffic times would be further flooded with additional traffic. Concerned about Northampton General Hospital and its ability to cope with increased demand. Concerns regarding the demand on schools, doctor’s surgeries and leisure and community facilities currently in east Northampton (exacerbating existing problems). Concern about existing housing developments in the Moulton and Overstone areas with problems including an overburdened local road network; increased traffic movements; and a rise in numbers of patients accessing the

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hospital. The three sites should be considered unsuitable for the negative impact on Northampton due to their location on the border of the borough of Northampton but not within West Northamptonshire's area of jurisdiction. Concern that Council Tax and developer contributions would go to North Northamptonshire when the impacts are on Northampton.

- **Blakesley Parish Council** - The approach needs review- consider approach taken by Milton Keynes council to develop a vision for the area from which spatial options in planning terms can be worked through. The plan needs to align/conform to the Oxford Cambridge Arc, which will take precedence. The WNC timetable does not have any mechanism to check its draft proposals against this emerging policy.
- **Blisworth Parish Council** - Recognise the need for sustainable local growth, however, this should not be at the expense of the health, rural community, or safety of surrounding impacted communities. Concerns surrounding proposed increases in housing density south of Northampton, surrounding Towcester and east of Old Stratford. Blisworth is used as a cut through for traffic from Northampton to the A43/A509 (identified as one of the Policing Regional teams' strategic priorities). Increased traffic and lack of compliance with speed limits through the village. Concerned that highways investment concentrates on major truck roads such as the A45, A509 and A5 but ignores the impact to minor rural communities and roads. Concern that funding is not available to address traffic impact. Increased housing creates further pressure on rural roads and communities which is not addressed by the plan. This is further aggravated by the proposed developments of industrial facilities at the M1 J15 Rail Central, Northampton Gateway at J15 and DHL on the A5. Whilst Blisworth, Milton Malsor, Gayton and Collingtree include a number of services which could be accessed on foot, the range of facilities is lacking e.g., supermarket, secondary school, employment opportunities. Limited local bus services and no appropriate cycle network. Discussions to date do not address lack of funding for traffic improvements initiated by residents and the lack of ability to solve traffic safety concerns in an existing constrained rural environment. Responsibilities are not aligned between enforcement and the Council owners of the infrastructure; makes addressing these issues difficult.
- **Brafield on the Green Parish Council** - More emphasis of important strategic issues that should inform the Council's future planning priorities is needed. These include the following. Pandemic consequences- in terms of homeworking the need for proportionate/supportive infrastructure in both rural and urban areas (broadband). Retail reinvention- the contraction of Core Business Districts in urban areas (Northampton) and the opportunity it offers for sustainable/affordable housing options and other uses. The tourist potential following ventures such as Northamptonshire Walks and the increase in cycling since the pandemic; there should be more promotion of cycle routes through quiet lanes and bridleways (together with more education on the use of various types of paths). The developing interest in environmental responsibility and improvement through community ventures such as Northamptonshire Wombles. Existing infrastructure

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deficit/weaknesses e.g., roads, NHS (the hospital), education, broadband. Spatial relationships and potential partnership working in strategic alliances with neighbouring places - North Northamptonshire and Milton Keynes, Bedford, Olney, Market Harborough, Banbury, Stamford, Bedford, Leamington Spa etc. The value and importance of cultural infrastructure in improving community health and wellbeing. The specific nature, presence, and profile of the University of Northampton to the town of Northampton in particular and its future impact on the development of the area. Rural areas (see re Q29) – the need better to regulate development here to avoid overdevelopment of 'executive' housing units of limited affordability. The deficit of affordable homes delivered over the past plan period needs factoring into any future requirements and result in fewer young adults having to leave rural areas.

- **Braunston Parish Council** - The consultation appears premature when the new settlements study is ongoing and the 'call for sites' is being re-opened. Further consultation should be undertaken if there are any significant new sites.
- **Brixworth Parish Council** - The call for sites shows a significant number of smaller sites scattered mostly on the edges of existing settlements. This is not plan led. Need more "joined up thinking" in considering long term environmental impacts. Policies need to be flexible allowing for technology improvements. Developments must include vehicle electric charging points, solar panels/voltaic cells requirements. Classes B/E/sui generis developments require adequate SUDS provision for improved flood protection and environmental impact assessments. The Water and Resources Action Programme (WRAP) is a very useful model.
- **Bugbrooke Parish Council** - No provision for replacing/expanding and developing the General Hospital in Northampton. A plan for the next 15 years would be more effective; difficult to know what will be needed in 2050. The pandemic has shown how quickly needs and habits change, and the trends created are likely to remain such as working from home. Support for bold and radical plans going forward in terms of sustainability, environmental impact and creating thriving local communities linked with a network of small towns.
- **Cogenhoe and Whiston Parish Council** - Reference to flood risk should be included in the plan. Concerns over development from east & south west of Northampton encroaching towards the villages, increasing the flood risk. Neighbouring settlements must be consulted on developments of 10+ houses.
- **Cold Higham Parish Council** - Principles and visions are difficult to argue with, as they are so general. The next round of consultation will presumably be more detailed and easier to agree/disagree with. It is a matter of 'How will this be achieved?' - this is the most important issue for parish councils.
- **Crick Parish Council** - Spatial objectives are sound and impressive. Now follow through and create a legacy of innovative, harm-free solutions that will enhance West Northamptonshire, not ruin it forever.
- **Daventry Town Council** - The spatial strategy needs to have a vision and consider future transport needs in relation to future transportation technologies. There are no plans to expand any green infrastructure and

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create a landscape; the plan should be to enhance them. There are no plans for burial grounds. The plan lacks vision into what future technologies will be available. Flexibility needed to change with emerging technologies, changes in community needs and to meet global event challenges.

- **Deanshanger Parish Council** - The Council should delay this consultation and wait for the draft Oxford Cambridge Arc Spatial Strategy to be published. This will become national planning guidance and take precedent; not taking it into account may mean the plan will need to be revisited or even face legal challenge. Delay would also allow work commissioned on new settlement options to be published. The possibilities for development in Northampton town should be considered; these have been dropped from the SLAA and this consultation.
- **Duston Parish Council** - Broadly support content of the consultation. Welcome employment and the local economy are considered just as much as housing growth. Welcome recognition of culture and heritage offer. It is inevitable that much of the new housing development will take place in Northampton, Daventry, Brackley and Towcester. However, some housing should also be directed to the larger villages and small villages should have “in-fill” developments. Enhancing Town Centres is welcome. Recognition should also be given to small amenity shops (e.g., the supermarket metro stores, community post offices). The existing target of 35% affordable housing for the Northampton Related Development Area (NRDA). This should be retained although the NRDA boundary may need to be revised. More consideration should be given to how each new development connects with existing communities e.g., cycle paths and pedestrian footpaths. Consideration also needs to be given to the environment such as enhancing biodiversity on public open spaces and additional tree planting. New community facilities should be fitted with solar panels etc to make them carbon neutral. Welcome the recognition for electric charging points and the need for high-speed broadband. Applaud the recognition to be carbon neutral by 2030 and the growing need for high quality green spaces. In S106 agreements the local Parish Council should be given the opportunity to adopt or decline the public open space on new build developments. Major improvements in road infrastructure needs to be put in place for further developments. Request to be consulted regarding all future developments on the fringe of Duston. The Duston area should be allocated S106 monies to improve infrastructure.
- **East Farndon Parish Council** - Object to the proposal for Land to the South of Market Harborough (2,000+ dwellings between East Farndon & Market Harborough). The rural village environment of East Farndon would be destroyed and engulfed by the town of Market Harborough. Residents have strongly expressed a desire to remain a separate settlement (see October 2021 residents survey and recent village meetings). East Farndon has only rural village services and is a large distance from any major town in West Northamptonshire. As the land borders Market Harborough, Harborough District Council (HDC) would have to make a major investment in additional

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local services to support the proposed development site, including roads, schools, health centres, flood control infrastructure, etc. A development of this scale will have massive impacts on transport, landscape, and heritage, with hugely valuable green space and historic features lost for ever. Traffic is already a major problem in the village, with many following the route of Main Street to link up with the A14 and onwards to the M1 and M6 via Great Oxendon or Clipston. The new development will make this problem unmanageable. The sites proposed span very attractive hillsides and open fields- they are a popular walking area, supporting the mental health and wellbeing of residents. Retaining the proposed sites as green space is vital to reducing the impacts of climate change. Any further substantial development south of Market Harborough will have a potentially catastrophic flooding impact within the town. The site impacts areas of historic importance, including a substantial World War 2 air crash site and a wide expanse of ridge and furrow field landscape. The Parish Council has met with senior planning leaders from WNC and the Brixworth Ward Councillors and received correspondence (letter). This has helped to clarify the situation, but it does not guarantee that the proposed housing development will not go ahead.

Concerned that WNC did not consult with the Parish Council, or notify in advance, that this major development would be considered in the plan and the lack of a consultation event held close to East Farndon. Concern that there could be a boundary change. The development is in contravention of WNC planning policies including Policy BN5 - The Historic Environment and Policy S1 - The Distribution of Development. Requests this option is removed as an offer to HDC. The Parish Council will write to HDC to formally request they decline this offer from WNC to develop housing on the site and exclude it as an option in the upcoming HDC strategic plan.

- **Easton Neston Parish Meeting:** Query if the National Planning Policy Framework been considered in drawing up this plan; it must legally be the basis of the plan. Easton Neston Parish Meeting rejects option 4b, relating to Towcester; not a viable option and does not reflect residents wishes.
- **Ecton Parish Council** - Strongly object to the inclusion of the section titled Northampton East. Should not be considering areas outside the boundary; SLAA sites 38, 39 and 40 should be removed from the plan and the SLAA/other supplementary material. The SLAA states it does not include land that is not part of WNC or including any land formerly part of Wellingborough District. Paragraph 5.3 recognises cooperation with North Northamptonshire Council for sites close to the boundary, not over the boundary. Paragraph 5.4 goes on to define the geographic area again to be West Northamptonshire only. The Neighbourhood Plan was recently adopted- extracts from the Vision, Policy 9 Maintaining the separate identity of Ecton village' and Policy 10 Important public views and vistas quoted (referencing area designated on the Policies Map as 'sensitive to coalescence' between Ecton Village and Northampton). These constraints are mentioned within the Consultation, but WNC also recognise that the sites are for North Northamptonshire Council to decide. Note site 210 on Lower

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Ecton Lane within the SLAA. There is already significant traffic congestion at Lower Ecton Lane junction with Crow Lane and a traffic using the village as a cut through. Also experience pollution (odour, dust) from the existing businesses on the site. No development in site 210 should be agreed without significantly improved environmental engineering and improved traffic management.

- **Evenley Parish Council** - Support references to the need to work with adjoining authorities (North Northamptonshire, Harborough District, Milton Keynes). Would welcome a greater focus on a social/community development strategy, alongside this Plan. The population of the area will increase substantially if the Plan goes ahead, and there should be investment in working out how new people – families, single people, young and old - will be integrated with existing communities.
- **Grange Park Parish Council** - Whole concept is flawed; should be withdrawn and begun again. If housing need assessment data is accepted, then the requirement for new dwellings is 2,139 per annum. The existing JCS plus local plan part 2 is set to deliver 33,860 dwellings. This is approximately a 15-year supply. The existing JCS has a planning horizon of 15 years to 2029. If this is longer appropriate after 7 years this suggests that a 15-year planning horizon is too ambitious; a 30-year horizon is then unachievable. In Northampton, the Market Place, the Riverside Development, the Old Bus Station, and the High Street all offer great potential yet to be realised; the Town currently is uninviting. Keep the new strategic plan simple. Concentrate on meeting existing housing commitments and solving existing issues. Meet the spatial objectives within the developments underway. Set no more than a 15-year horizon and deliver on it. Reference to need for brownfield sites to be used. Concerned that the process is being driven by the landowners and developers rather than as a response to the needs of the community. All of the options around Northampton are outside of the NRDA and as such would have struggled to gain planning permission under the old JCS. When options are baked into a strategy document there will be a rush to develop them, and sustainable communities will not be the objective; the protection of rural communities will be overlooked (reference to recent application for 330 houses to the south of Grange Park made). Overall, do not support any of the spatial options around Northampton; finish what has already been committed; take time to develop a future strategy; once the existing commitments are approaching completion then carry out a new housing needs assessment (to include a description of what type of housing is needed, what type of community amenities are needed and what the infrastructure requirements are); then make the strategy. Confused by the consultation process; very little time to assimilate what the spatial strategy is and to engage with parishioners. Predetermined yes/no questions are too constraining.
- **Great Oxendon Parish Council** - Object to Spatial Option 1a – Northampton North – North of Buckton Fields and Spatial Option 6 – Land to the South of Market Harborough. Great Oxendon is small rural village. It is located alongside the busy A508, a main throughfare for traffic from Northampton to

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Market Harborough as well as a link to the A14 and onwards to the M1 and M6. Great Oxendon already experiences problems regarding traffic (key concern of Parish Council and residents). A residential development of this size at both ends of the A508 would put enormous pressure on this road; traffic through the Parish would be unmanageable. Great Oxendon only has rural village services and is a large distance from any major town. It relies heavily on Market Harborough. A major investment would be needed to support the proposed development including roads, schools, health centres, flood control infrastructures etc. The sites span across attractive hillside and open fields. The area proposed that borders East Farndon Parish is a popular walking spot, and the green open space supports the mental health and wellbeing of residents. Both sites are 'green space' and are vital in contributing to the reduction of climate change.

- **Greens Norton Parish Council** - The approach needs review- possibly take the approach by Milton Keynes council to develop a vision for the area from which spatial options in planning terms can be worked through. The plan needs to align/conform to the Oxford Cambridge Arc, which will be senior to the WNC plan. The WNC timetable does not have any mechanism to check its draft proposals against this emerging policy.
- **Hackleton Parish Council** - Understand that there are 30 smaller sites designated for development- request details of these sites and how they have been selected. Strongly support the regeneration of Northampton as the County Town. Potential for inward investment to the County should be sought particularly from the opportunities arising from the Oxford Cambridge Arc. Should not settle for low skilled, low-cost jobs and building 4 or 5 bed roomed houses resulting in a spatial mix-match. Ensure that the HENA calculations are sound and up to date. To regenerate Northampton Town development should be to the north of the Town to prevent dormitory estates for Milton Keynes and beyond. South of the Town has already seen large amounts of development in the last 20 years and the loss of rural character; this cannot continue. Any development must be of a suitable design and construction, support the green economy and conserve and enhance the unique landscape.
- **Hardingstone Parish Council** - There should be no development without infrastructure in situ. Ideally new developments would be new areas with new infrastructure rather than being tagged onto an existing community whose infrastructure is at capacity. The Strategic Road network requires consideration/development to enable the development proposed in the plan. Query how the housing need has been calculated and if this should be amended given the change in recent working practices. The numbers have been established based on details from 2019; this is pre-Covid. More people are now working from home, meaning that access to major towns and cities may not be as important as before.
- **Hinton-in-the-Hedges Parish Meeting** - Get WNC out of the Oxford/Cambridge Arc. Take the views of the current taxpayers into account. Don't just accept government decrees. The Strategy seems designed to turn

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most of WNC into urban sprawl – there will be very little of the ‘valued landscapes left’.

- **Holcot Parish Council:** - Difficult to effectively respond to a consultation with so many gaps in knowledge of WNC's strategic intentions. A single, comprehensive, and coherent plan where all the infrastructure, utilities, housing, and employment (etc) are covered should be prepared. A piecemeal approach means some aspect of the vision will not be achieved due to strategic tensions arising. Strategic plans cannot be achieved in isolation of national and other local plans. There needs to be a regional plan, perhaps including the Oxford-Cambridge Arc strategic plans, before any WNC strategic plan can be approved. Not clear how a strategic joined-up plan will be developed and approved, and what the effective governance will be to ensure that it is maintained throughout its life. There is a real risk that any plan developed now will not persist through to 2050. The HENA driving requirements is 'old world' and gives a flawed requirement. It does not consider the environmental and social drivers of Hybrid Working for instance, with the implied Northampton assumption being that people will travel to work. All proposals are greenfield sites with no apparent consideration of brownfield options. Options refer to the possibility of infrastructure development, but there is no sense of a particular option aligned to infrastructure changes required to achieve it. Infrastructure should be available as an intrinsic part of any development, not afterwards e.g., the route between Brixworth and the A43 through Holcot is used by excessive traffic, and HGVs. Adding large scale development exacerbates this. Every option should consider the impacts on existing communities, and how adverse impacts can be minimised. Environmental objectives are critical; non-compliance should cause that spatial option to be dropped. The potential options do not make sense when considering housing vs employment options; around Northampton the principal housing options are in the north, employment options in the south. There are no options where improved affordable public transport is built into proposals. There are no options that specifically focus on electric vehicles. Concerned that Sossles and other environment and heritage features will be blighted by proposals. An assessment should be undertaken of the whole local environment, not just the sites themselves - a location near to a community or environmental/heritage feature will have an impact. The objectives broadly make sense, but the information provided does not give comfort that those objectives will be met. Have the objectives been adopted for all WNC services and strategic activity? There is no commentary on the utilities needed e.g., water, sustainable energy. The options do not bring forward proposals in respect of these services; assumes that 'net-zero' services will be provided by third parties. Consider the impacts on air quality and existing road infrastructure How will the plan ensure sufficient affordable housing is built? How will it ensure every property, and its associated transport impacts, has a zero impact on climate? What sustainable building practices, design and materials will be required? There is a focus on Northampton in the proposals, without plans to represent how Northampton

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will be able to cope. Developing housing to the north of Northampton will mean existing poor transport links will be overwhelmed. How will WNC ensure that proposals build in local priorities? How will CIL/S106/infrastructure levy proposals be built into plans to support financing of local community impacts?

- **Kilsby Parish Council** - Given the employment developments already taking place and proposed at M1 junctions including 15, 15a, 16, 18 and 20, it appears there may be a danger of over-supply of stated requirements if there is no proper co-ordination between the strategic plans of West Northants and those of other local authorities.
- **Kingsthorpe Parish Council** - Support expansion but essential to provide infrastructure at the beginning.
- **Little Houghton Parish Council** - Provides overview of key characteristics and valuable attributes of the Parish. The village has strong local connections with neighbouring villages such as Great Houghton, Brafield and Cogenhoe. These parish councils joined with local landowners and residents to resist the West Northamptonshire Joint Core Strategy option to build 18,000 houses in this rural area. Disappointed the plan review is being undertaken again so soon and that strategic policies may be replaced. Conscious of the perpetual creep of development from Northampton into rural areas. Employment sites such as Brackmills and Houghton Gate, are spreading along the A428 spoiling the green corridor into the town, and housing development from the B526 Newport Pagnell Road engulfing Wotton and Hardingtonstone, coming ever nearer to Great Houghton with existing plans for up to 800 houses at The Green. The needs of the urban areas and the desire for growth should not always take precedent over the concerns and needs of the existing rural settlements. The references to the rural area are comparatively light in the Vision and Objectives. Would like to see some intent to protect and respect the nature and character of rural settlements.
- **Milton Malsor Parish Council** - Promotion of the OxCam Corridor as an advantage for development opportunities is unnecessary and unwelcome, as the 2017-20 average delivery of 23,000 dwellings p.a. in that area is slightly more than the Standard Method requirement. Although the NIC has identified 23-30,000 homes as a desirable aim for the “Arc”, this is not binding, and the Corridor is not nominated as an “Uplift” area. Any over-development would mean the loss of open land and the erosion of the benefits of village and rural life. Whilst acknowledging the statutory obligations implicit in producing the Plan, there is an impression of an eagerness to facilitate development, with the short consultation period adding to the feeling that most of the proposals are inevitable. In this, the wishes of South Northants residents could appear as secondary to the benefits accruing to developers and their partners.
- **Moulton Parish Council** - The residential justification for delivering potential employees to Moulton Park is specious; no further residential development can be justified by this argument.
- **Overstone Parish Council** - Comments made which are contrary to the plan must be reflected in the next version. Cannot carry on supporting badly

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planned and designed developments that achieve a profit for the developer and provide poor overall value for money. WNC planners should follow through the conditions on approval to ensure quality is delivered. There should be accountability with WNC for achieving results. Local communities must be fully consulted on all planning issues that affect them. This vision is a set of noble statements backed by several documents. However, there is no substance showing how this will be implemented/achievable. How vibrant villages will be achieved. How the pandemic will change the nature of work/home life. No reference to Covid which has had such a marked effect. How the new developments will be served by new roads. There is no mention of highways; concerned about substandard road network. The document is an exercise to show residents how many new homes West Northants wish to build, with little or no thought for existing or future residents. There are areas that have good transport links and space to accommodate SUEs some of which are not included in this vision. The transport infrastructure must be the starting point for any future development. It is insufficient to say that we will improve a road such as the A43 North to South by building a large SUE. A lack of proper provision for those travelling East to West or vice versa, has adverse impacts on local roads such as, Holcot Lane and Billing Lane. Creating bottle necks and grid locks at the outset of a development should make the proposal void as it is unsustainable from the outset e.g., proposed school in Moulton – highway provision is non-existent. Will there be sufficient water for Northampton and the surrounding area? Comments provided on SLAA Sites 148, 149, 206 and 207. “Collective Vision for making West Northamptonshire a great place to live, work, visit and thrive.” “We want our new council to reflect the times we live in.” “As the national effort to fight Covid-19 continues, WNC must focus on playing our part to create a sustainable recovery.” It is unclear whether the spatial plan reflects these statements. ‘Connected communities’ means as much traffic on existing roads as possible.

- **Potterspury Parish Council** - The document lacks vision and has serious flaws and fails to offer clear choices. Aligning this consultation to a yet unpublished pan-regional strategy (Oxford-Cambridge Arc) appears bizarre. There is a risk the plan will face a challenge on the basis it is not sound because it did not consider current national policy. A well-considered plan based on firm government guidance, particularly concerning the Oxford-Cambridge Arc, would be better than one based on flawed consultation.
- **Rothersthorpe Parish Council** - Village Feedback & Public Open Session (November 2021)- agreement that official communication of the Strategic Plan Consultation by WNC had been poor and not well publicised, in particular for those residents who have no access to social media. For many residents the only knowledge they had of the consultation was via communication from the Parish Council. Would appreciate feedback or comments regarding both shortlist and longlist sites around the Rothersthorpe Parish. Wish to work closely with WNC in all aspects of future development to ensure positive benefits for the people, environment, and economy of Rothersthorpe.

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- **Syresham Parish Council** - The UK will need to consider more self-reliance on food production in the future; prime agricultural land needs to be protected. Must consider transport infrastructure ahead of deciding on areas for development. There is no indication of how residents will be encouraged to become less dependent on the car and achieve the ‘net zero’ goal. Residential and employment developments need to be closer together to reduce commuting distance.
- **Tiffield Parish Council** - The plan does not reflect the wishes of the electorate and taxpayers of the county and seems to be focussed on the needs of powerful developers which subverts the worthy ambitions of the vision that opens the plan. Fundamental errors in the calculations of housing and economic needs must be corrected and the plan reissued with more realistic conclusions.
- **Towcester Town Council** - Towcester is an historic market town; vital that development respects its character and contribution to Northamptonshire’s rural heartland. Concerns over the growth option for Towcester. Reject Spatial Option 4b as not a viable option. Residential development at Towcester Racecourse would not be appropriate given the limitations of its highly sensitive setting. Some very limited development might be possible, to help further secure the future of Towcester Racecourse, but development would need to be carefully considered and fully justified, considering its special landscape setting, loss of productive farmland, its proximity to residential areas, and the capacity of the A5 to take additional traffic. Welcome the opportunity to engage constructively with WNC to discuss options for growth that offer more sustainable development for the town.
- **Walgrave Parish Council** - Local communities must be fully consulted on all planning issues that affect them. Their opinions should matter and be fully reflected in any plans. Local Authorities are there to represent the constituents.
- **Weedon Parish Council** - Concerned the Strategy takes as its starting point the building of houses in urban areas. West Northants is a predominately rural area; disappointed that the Strategy says little about development in rural areas. Rising house prices and demand for houses in rural areas should tell you where people prefer to live. Most villages are prospering without, or perhaps despite of planning intervention, but there is scope more and often better-quality development than in towns, provided the historic landscape and countryside is reasonably protected. Development is regularly rejected because of what village residents perceive to be a pedantic application of planning/conservation, guidelines, and officer disregard of resident views e.g., the existing Depot buildings in Weedon Bec (for housing).
- **Whittlebury Parish Council** - The document has no vision, contains little strategy, and has few viable sensible options. The plan needs to align/conform to the Oxford Cambridge Arc, which will be senior to the WNC plan. The WNC timetable does not have any mechanism to check its draft proposals against this emerging policy; the plan therefore risks being challenged.

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- **Wicken Parish Council** - The projected population increase to 2050 is 57,288 in West Northamptonshire of which 15,106 is estimated to be within South Northamptonshire. Based on ONS statistics the overall number of new dwellings should only be 23,870 (2.4 per dwelling) and South Northamptonshire's housing need is 6,317.
- **Wootton Parish Council** - Biggest concern around this plan is climate change and the impact on natural resources and biodiversity. Building operations and construction account for nearly 40% of global energy-related CO2 emissions; building is often upon natural open green spaces so the natural capital and resources we need to combat pollution and climate change are being depleted. Warehousing development along the M1 is having a devastating impact on our natural environments. A 'climate lens' should be applied to future decisions to ensure we have a longer-term view of prosperity and wellbeing. Natural capital must be at the heart of any development decisions that are made. With regards to option 1e and 1f, concerned the immediate area is seeing so much development, there are problems with congestion, air, and noise pollution. Do not build on flood plains; already experiencing flooding issues which extend from J15a, through the proposed development area and up to Horton. The plan should be delayed allowing the completion of current projects such as The Market Place, The Waterside Development, the Old Bus Station, and the Town Centre regeneration project. Wish to be consulted on any plans which negatively alters the green biodiverse nature of our location adjacent to countryside, and changes to the traffic pollution levels or increased levels of traffic congestion. Consultation period (8 weeks) should be extended. The Covid-19 pandemic has changed the patterns of work and family life and a plan lasting 30 years is too long; it should be reviewed every 5 years instead to give a clearer impression of milestones hit or missed.
- **Yardley Gobion Parish Council** - The approach needs review- possibly take the approach by Milton Keynes council to develop a vision for the area from which spatial options in planning terms can be worked through. The plan needs to align/conform to the Oxford Cambridge Arc, which will be senior to the WNC plan. The WNC timetable does not have any mechanism to check its draft proposals against this emerging policy.

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