

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
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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>