



NORTHAMPTON
B O R O U G H C O U N C I L

OVERVIEW AND SCRUTINY VIEWS AND RECOMMENDATIONS TO
Full Council – 8th September 2009

Report Title	RECOMMENDATIONS OF OVERVIEW AND SCRUTINY COMMITTEE ONE (PARTNERSHIPS, REGENERATION, COMMUNITY SAFETY & ENGAGEMENT) – CONSULTATION – WEST NORTHAMPTONSHIRE EMERGENT JOINT CORE STRATEGY
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Agenda Status: PUBLIC

1. Purpose

- 1.1 To present to full Council for consideration, Northampton Borough Council's formal response to the consultation on the West Northamptonshire Emergent Joint Core Strategy, as recommended by Overview and Scrutiny Committee One, (Partnerships, Regeneration, Community Safety and Engagement).

2. Recommendations

- 2.1 Overview and Scrutiny Committee One recommends: -

- 2.2 1) That full Council be informed that the Committee did not have adequate time to undertake a full, comprehensive Scrutiny Review into this issue and it is recommended that further scrutiny work is conducted as the Strategy develops.

Overview and Scrutiny Committee 1 (Regeneration, Planning, Community Engagement and Safety) recommends to full Council that Northampton Borough Council's response to the consultation of the Emergent West Northamptonshire Joint Core Strategy contains the following comments and observations: -

For ease of delivery, the following series of comments and observations are grouped in specific areas: -

The Consultation Process

- 2) Confirmation regarding the progress of Level 2 Strategic Flood Risk for Northampton be ascertained before a full response to the areas of growth is given.
- 3) That disappointment is expressed that the West Northamptonshire Emergent Joint Core Strategy contains jargon and plain English should be used in the next version.
- 4) The six-week consultation period was inadequate, especially as it took place over the summer holidays.
- 5) That it be recommended that the next stages of consultation - Pre Submission and Submission be extended as they are over public holidays, namely Christmas and Easter.
- 6) That an Equality Impact Assessment of the West Northamptonshire Emergent Joint Core Strategy is carried out by the JPU and any actions arising out of this are linked.
- 7) That the pre-submission consultation stage of the West Northamptonshire Joint Core Strategy be referred to the Northamptonshire Countywide Scrutiny Forum for review.

Vision/Options

- 8) That the Council agrees with the Vision as set out in the Emergent Joint Core Strategy.
- 9) That Option B – *it can be focused in a small number of large development areas* - be the preferred Option.

Impact on Northampton

- 10) The Council should challenge the validity of the Government's growth figures that are being imposed on Northampton as part of the Regional Spatial Strategy. In particular in relation to:
 - the number of houses being proposed being in excess of what Northampton requires to meet local needs
 - the target number of houses being undeliverable in the timescales provided
- 11) The figure of 35% for affordable housing is still appropriate but there is a need for more houses rather than additional flatted accommodation, subject to the Strategic Housing Market Assessment.
- 12) That affordable housing should also take into consideration provision for older people and those with disabilities.
- 13) The Council needs to be satisfied that a robust definition of affordable housing is in place.
- 14) That developments on Brownfield sites should be completed first before development on Greenfield sites.

- 15) It is accepted that growth needs to happen but Policies must be in place that allows growth provided that the infrastructure is delivered in a timely manner. It will be necessary to ensure that Policies are in place to require developers to make the necessary contribution to the cost of providing infrastructure.
- 16) That It must be clear within the Joint Core Strategy that the planned development growth will not be allowed without all the necessary infrastructure. Policies within the Joint Core Strategy should identify the key pieces of infrastructure required for each growth location
- 17) That all proposed development sites should have clear access to the town centre, and detail is required as to how this would be achieved.
- 18) The Council cannot comment at this stage on each individual proposed area for development or growth, as there is not enough infrastructure detail provided in the Plan for each site.
- 19) The overall aims and objectives for transport are not contained in the Emergent Joint Core Strategy and this is a key issue for the plan to address.
- 20) That the Council agrees with the comments of the Environment Agency that developments should avoid flood risk areas and the proper mitigation be put in place.
- 21) That the Council needs to ensure that it fulfils its responsibilities regarding preventing flood risks.

Delivery of Infrastructure

- 22) That the Council comments that the Joint Core Strategy must provide a clear and robust framework for infrastructure, including transport, that allows the Central Area Action Plan to be delivered.
- 23) The Joint Core Strategy should provide a policy framework to enable the provision of employment opportunities within the town centre so that employment growth is achieved. These policies must ensure that employment growth is aligned to the Central Area Action Plan.
- 24) The Joint Core Strategy must provide a clear policy framework to ensure that the Council's strategy for the regeneration of Northampton as set out the Economic Regeneration Strategy 2008 – 2026 is deliverable, not only in so far as these relate to the Central Area Action Plan but also for the rest of the town, including those areas for regeneration identified in the EJCS.
- 25) That any regeneration of existing areas must be undertaken with the full involvement of the Community.

Further Scrutiny

- 26) That Overview and Scrutiny undertakes further Scrutiny work at the Pre-Submission stage of the West Northamptonshire Joint Core Strategy.

Background and Issues

3.

- 3.1 Cabinet resolved that the West Northamptonshire Emergent Joint Core Strategy be referred to Overview and Scrutiny for immediate scrutiny with a view to bringing a report to full Council in September 2009. Overview and Scrutiny Committee One agreed to this request and invited all Members of the Council to have an input into the Review, which was held over three meetings – 6th, 12th and 18th August 2009.
- 3.2 Due to the short timescale to undertake this Review, the Committee acknowledged that it could not undertake a full comprehensive piece of scrutiny work and therefore identified four key issues contained in the Emergent Joint Core Strategy to be examined. It was acknowledged that these could only be examined on a very strategic level: -
- The Consultation Process
 - Visions/Options
 - Impact on Northampton
 - Sustainable urban growth
 - Regeneration
 - Delivery of Infrastructure
- 3.3 The purpose of the Review is to recommend to full Council, Northampton Borough Council's formal response to the consultation on the West Northamptonshire Emergent Joint Core Strategy.
- 3.4 Information obtained from the following sources formed the main body of evidence gathered by the Committee:
- Portfolio Holder (Regeneration and Planning)
 - Team Leader and Community Engagement Officer, Joint Planning Unit
 - Senior Planning Officer, Environment Agency
 - Leader of the Council, Northampton Borough Council
 - Head of Planning, Northampton Borough Council
 - Various Members of the Public
 - A number of Members of the Council
- 3.5 In considering the evidence the following conclusions were made: -
- That the Committee had very limited time to undertake a full, comprehensive Scrutiny Review. Given that it had just three meetings allocated, it was agreed that four key issues of the West Northamptonshire Emergent Joint Core Strategy would be investigated: -
 - The Consultation Process
 - Vision/Options
 - Impact on Northampton
 - Sustainable urban growth
 - Regeneration
 - Delivery of Infrastructure
 - It was agreed that the Council should undertake further scrutiny work at the Pre-Submission stage of the Joint Core Strategy.
 - The Council has in the past, and should continue to question the validity of the

Government's growth figures that are being imposed on Northampton as part of the Regional Spatial Strategy. In particular in relation to:

- the number of houses being proposed being in excess of what Northampton requires to meet local needs
 - the target number of houses being undeliverable in the timescales provided
- From the evidence gathered by the Committee it is apparent that there is currently an excess of flatted accommodation in the town and that no further such accommodation is required, there is, however, a need for more houses. The Committee therefore feels that the figure of 35% for affordable housing is still appropriate.

The Consultation Process

- That the consultation process has been inadequate to fully engage with people because of the fixed 6-week period and it being held over the summer holiday period.
- The Committee strongly believes that the six-week consultation period was inadequate and would have recommended that the period should be extended. The Committee therefore considered that further consultation periods avoid key holiday periods. It also recommends that exhibitions are held at times when working people can also attend and that use is made of fixed exhibitions at key venues in the town such as The Grosvenor Centre. The Committee further recommends that the next stages of consultation - Pre Submission and Submission be extended as they are over public holidays, namely Christmas and Easter.
- It was concluded that the Emergent Joint Core Strategy contained jargon and use of plain English should be recommended in future consultation documents.
- It would be beneficial to seek confirmation regarding the progress of Level 2 Strategic Flood Risk for Northampton be ascertained before a full response to the Consultation is given.
- The Committee acknowledged that the lack of an Equality Impact Assessment for the Emergent Joint Core Strategy could mean that the Emergent West Northamptonshire Joint Core Strategy might have an unintended adverse impact on any particular sector of the community.

Vision/Options

- The Spatial Vision – Where we want to be - contained in the Emergent West Northamptonshire Joint Core Strategy has evolved over many years and covered the period up to 2026. Strategic objectives by which the four Local Authorities (Northampton, Daventry, Towcester and Brackley) would deliver that Vision are also contained in the document. The Committee notes that as an aspirational Vision it reflects what the Council would like to see for the town.
- Following consideration of Option A and Option B in relation to the distribution of development, the Committee concluded that: -

- Option B concentrates on developments in and around existing settlements. The Joint Strategic Planning Committee chose Option B as the preferred option for reasons as set out on page 18 of the Emergent West Northamptonshire Joint Core Strategy. This approach would also include urban development sites in Northampton.
- Existing un-built Local Plan Allocations are highlighted in blue on the plans contained in the Emergent West Northamptonshire Joint Core Strategy.
- Brownfield sites should be completed first before consideration is given to development on Greenfield sites.
- Option B – was supported as development can be focused in a small number of large development areas

Impact on Northampton

- The Emergent Joint Core Strategy relates to an area defined as West Northamptonshire and focuses particularly on Northampton as the county town, but there is no evidence that the proposals relate to the whole of Northamptonshire. The Emergent Joint Core Strategy needs to sit alongside plans for the rest of the County and this needs to be evidenced.
- The Committee noted that the Emergent West Northamptonshire Joint Core Strategy in relation to Daventry, Towcester and Brackley is a countywide issue and recommends it should be referred to the Northamptonshire Countywide Scrutiny Forum for review.
- Affordable housing should also take into consideration provision for older people. There is a requirement for a more defined rationale of what denotes affordable, possibly the need for a local definition. The current criteria set for affordable housing is very broad and requires challenging.
- There is a need to find a location for growth that will sustain the infrastructure. It is accepted that growth needs to happen but Policies must be in place that allow growth but not under Developers' terms.
- The Committee confirmed the need to know the types of houses proposed for development, together with the numbers before consideration can be given to the location of developments. Such developments should be built on Brownfield sites before consideration is given to building on Greenfield sites.
- The Committee agreed that comment cannot be made on each individual proposed sustainable urban growth areas as there is inadequate detail concerning the infrastructure required to support these areas. There is also little information about how these growth areas relate to the town centre in terms of transport links and regeneration initiatives.
- 5,400 housing units are proposed for Northampton North – 50% of which will be family accommodation. The figures indication there could be a lot of children to be educated in two or three Primary Schools and a Secondary School, therefore, there is a query regarding the adequacy of the proposed infrastructure. This is one example within the Strategy, which can be seen in other proposed growth areas.
- Based on the evidenced provided by the Environment Agency the Committee

shared residents' concerns regarding flood risks.

4. Options

- 4.1 Full Council will need to consider the whether Overview and Scrutiny Committee One's comments and observations should form the basis for Northampton Borough Council's formal response to the consultation on the Emergent West Northamptonshire Joint Core Strategy.

5. Policy

- 5.1.1 The report and its recommendations may have policy implications for Planning. Full Council will need to consider these issues in detail.

5.2 Resources and Risk

- 5.2.1 None.

5.3 Legal

- 5.3.1 Legal issues will need to be considered as part of full Council's response to the consultation on the West Northamptonshire Emergent Joint Core Strategy.

5.4 Equality

- 5.4.1 Equality issues will need to be considered. In its Equality Impact Assessment (Screening) the Committee reported that it does not appear that the Joint Planning Unit (JPU) has completed an Equality Impact Assessment this consultation process and has detailed the possible impacts on any particular sector of the community. The lack of an Equality Impact Assessment for the West Northamptonshire Emergent Joint Core Strategy could mean that the Emergent Strategy might have an unintended adverse impact on any particular sector of the community.

6. Consultees (Internal and External)

- 6.1 The Committee consulted and took evidence from a variety of sources as detailed in paragraph 3.4 of this report.

7. Background Papers

- 7.1
- Minutes of the meetings of Overview and Scrutiny Committee 1 – 6th, 12th and 18th August 2009
 - Minutes of the informal scoping meeting of Overview and Scrutiny Committee 1 – 22 July 2009
 - Emergent West Northamptonshire Joint Core Strategy
 - Briefing notes – Emergent Joint Core Strategy
 - Briefing note – Daventry Appeals
 - Briefing note – Phasing, Delivery and Funding
 - Report and various appendices – Issues and Options Consultation Stage
 - Executive Summary – Central Area Action Plan
 - Environment Agency's letter dated 18 August 2009 in response to the Committee's concerns and queries regarding flooding issues
 - Report of the Interim Head of the Joint Planning Unit and Community Engagement

Officer – Consultation and Communications Strategy and Action Plan

- Northampton's Local Development Framework – Annual Monitoring Report 2007/08
- Briefing Note – JPU – Exhibition attendance details
- Five year Housing Land Study
- Housing Land Position for West Northants 25.06.09
- Equality Impact Assessment Screening for this Review

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