

**LOCAL PLANS  
AND THE  
NATIONAL PLANNING POLICY FRAMEWORK**

**COMPATIBILITY  
SELF ASSESSMENT CHECKLIST  
(PAS Self-Assessment Toolkit)**

**1A: ACHIEVING SUSTAINABLE DEVELOPMENT**

**THE PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT AND CORE PLANNING PRINCIPLES (PARA 6-17)**

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF’s expectations?	How significant are any differences? Do they affect your overall strategy?
<p><b>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</b></p>	<p>The Northampton Local Plan was adopted in June 1997. Following the establishment of the Planning &amp; Compulsory Purchase Act 2004, some of the policies were saved, until such time when more updated development policies are adopted.</p> <p><b><u>Most of the saved policies are considered to be prescriptive and inflexible, which is against the spirit of the NPPF – which seeks to enable development and to undertake a positive approach to decision making and plan preparation.</u></b></p> <p>The policies in the adopted local plan sought to meet the development needs of Northampton as identified at that time. These include a range of development requirements from large scale developments to smaller land use schemes as follows:</p> <p>i. <u>Development Control policies</u> namely H1, H4, H5, H6, H7, H8, H10, H11, H18, H28, H29, H34, B1, B2, B3, B4, B5, B6, B8, B10, B14, B17, B22, B23, R11, R15</p> <p>ii. <u>Site specific policies</u> namely D1, D4, D6, D7,</p>	<p>There are a few key differences between the NPPF and the Local Plan.</p> <p>First, the Local Plan is out of date. The policies were informed by an evidence base that was relevant at that time. It is not as capable of adapting to rapid change as currently identified in both the West Northamptonshire Joint Core Strategy and the Central Area Action Plan.</p> <p>Secondly, the volume of policies in the local plan is such that there are policies for a wide range of proposals. Some of these policies are prescriptive and leave little room for adapting to changing needs and opportunities for growth.</p> <p>The preparation of the Northampton Related Development Area Local Plan provides an opportunity to bring these policies up to date, with an overall strategy that is more adaptable to changing circumstances whilst managing growth.</p>

	<p>D9, D12, D13, D16, D17, D20, D22, D23, D26, D27, D28, D29, D30, D31, D32, D33, D35</p> <p>Some of the above policies have been updated through the Central Area Action Plan, which was adopted in January 2013.</p> <p>The plan meets the needs of the population and investors at that time. As these have now significantly changed, particularly in light of the Objectively Assessed Needs prepared to inform the West Northamptonshire Joint Core Strategy, it can be concluded that the plan does not meet the requirements set out in para 14.</p> <p>Whilst there are no policies that seek to support a presumption in favour of sustainable development, the spirit of this requirement is evident in a handful of policies which seek to promote development and those that seek to meet the requirements of residents, investors and visitors.</p>	
<p><b>The NPPF sets out 12 core land-use principles which should underpin plan-making (and decision-making) (17)</b></p>	<p>The Local Plan was prepared in 1997, and was consistent with the Government's planning policy guidelines at that time.</p> <p>It is considered that the plan was prepared in a manner that is consistent with the ethos of some of the 12 principles set out in the para 17 of the NPPF, including:</p> <ul style="list-style-type: none"> <li>• Seeking high quality design and a good standard of amenity for all existing and future occupants (Policies E7, E14, E19, E20, E28, E29, E36, E40, H14, H18, H21, H23, H24, H26, B7, B9, B11, B13, T22)</li> </ul>	<p>See above response</p>

	<ul style="list-style-type: none"><li>• Support the transition to a low carbon future in a changing climate (E39)</li><li>• Contribute to conserving and enhancing the natural environment and reducing pollution (E1, E2, E4, E6, E9, E10, E11, E12, E17, E18, E38, L16, L17, L29)</li><li>• Conserve heritage assets in a manner appropriate to their significance (E26, E35, E38)</li><li>• Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling (T14) – it should be noted that the local plan did have a policy on pedestrian movement but this was not saved by the former Government Office for East Midlands.</li></ul>	
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## 1B: DELIVERING SUSTAINABLE DEVELOPMENT

### 1. BUILDING A STRONG, COMPETITIVE ECONOMY (PARAS 18-22)

<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<b>Set out a clear economic vision for the area which positively and proactively encourages sustainable economic growth (21).</b>	<p>The Northampton Local Plan was adopted in June 1997, and was informed by the evidence base available at that time.</p> <p>Policies B1, B2, B3, B4, B5, B6 and B14 can be prescriptive and inflexible.</p>	<p>The WNJCS and supporting evidence identifies the amount of development required up to 2029, including development within the Central Area. As the CAAP covers the town centre, it is envisaged that this area will be considered first in terms of a sequential approach and therefore identifies enough land to deliver employment.</p> <p>The preparation of the Part 2 Local Plan will inform implementation of the Core Strategy and update the CAAP.</p> <p>The evidence base for the policy is the West Northamptonshire Employment Land Study and the Joint Planning Unit's Employment Technical Papers (2010, 2011 and 2013). These informed policy which sought to safeguard existing employment sites, identify the jobs that need to be delivered within the plan period and the allocation of a strategic employment site to meet the needs of the Northampton's local operators.</p> <p>In preparing the Northampton Related Development Area, further work relating to the assessment of the long-term development potential of previously allocated sites will be undertaken. Decisions will be made in relation to which sites should remain allocated for employment purposes and which can be released.</p>

## 2. ENSURING THE VITALITY OF TOWN CENTRES (PARAS 23-27)

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><b>Set out policies for the management and growth of centres over the plan period (23).</b></p>	<p>The adopted Local Plan has policies which identify primary and secondary shopping frontages. It also has a policy which deals with change of use from a shop to alternative uses. These policies do not consider town centre uses as outlined in the NPPF. These policies focus primarily on shops. These are Policies R5, R6 and R7.</p>	<p>The Local Plan is significantly different from the NPPF in that it does not plan collectively for town centre uses. Rather, the focus is on retail being in the town centre and offices being promoted elsewhere as part of the B Use Classes Order categories promoted by Policies B1 and B2. It is also significantly different by virtue of the fact that the requirements of a sequential test and impact assessment for town centre uses are not embedded in the policies.</p> <p>The CAAP defines a town centre boundary, which has been assessed and revised on the basis of independent evidence prepared to support the CAAP, in addition to public consultation. In defining the Town Centre, care has been taken to ensure that the area is large enough to meet future needs but respectful of the edge of centre uses that exist within Northampton's Central Area.</p> <p>Policy 12 also identifies primary and secondary shopping frontages, to provide clarity on the types of uses which are permissible within these areas.</p> <p>The West Northamptonshire Joint Core Strategy contains policies relating to retail and offices and the requirements / application of both the sequential test and impact assessment.</p>

### 3. SUPPORTING A PROSPEROUS RURAL ECONOMY (PARA 28)

<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<b>Policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development (28).</b>	Northampton is a predominantly urban area. This is not applicable.	Not applicable.

#### 4. PROMOTING SUSTAINABLE TRANSPORT (PARAS 29-41)

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><b>Policies that facilitate sustainable development but also contribute to wider sustainability and health objectives (29).</b></p> <p><b>Different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas (29).</b></p>	<p>Car Parking policy was in place but not saved by Government Office for East Midlands.</p>	<p>The policies in the local plan are significantly different to the NPPF in that the strategy focuses on proposals associated with roads, road links, vehicular movements and traffic management.</p> <p>The Central Area Action Plan sought to address this. Policy 10 sets private non-residential parking standards, which are justified locally due to the land constraints within the Central Area and the over-arching strategy to encourage travel by alternative modes. The policy is intended to be applied in conjunction with the other transportation policies within the Central Area, including the over arching aspiration to deliver a coherent walking and cycling network for the town centre and beyond.</p> <p>The policy is not overly restrictive and allows for flexibility if there are particular circumstances where additional private non-residential parking could be justified.</p> <p>The policy approach and evidence has been developed in partnership with Northamptonshire County Council as the relevant transport authority. It is consistent with the Joint Core Strategy movement policy and the wider strategy of encouraging a modal shift across the whole of the West Northamptonshire area.</p>



## 5. SUPPORTING HIGH QUALITY COMMUNICATIONS INFRASTRUCTURE (PARAS 42-46)

There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.

## 6. DELIVERING A WIDE CHOICE OF HIGH QUALITY HOMES (PARAS 47-55)

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><b>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47).</b></p>	<p>The Northampton Local Plan was adopted in June 1997.</p> <p>Housing demand was identified through the then Northamptonshire Structure Plan, and the local plan confirmed that there has not been a problem in identifying a five year land supply of available housing land in Northampton. The plan therefore included a range of allocated housing sites to meet demand.</p> <p>However, the plan does not include phasing related policies and there was no evidence at that time that this was required.</p> <p>Given its time of adoption its targets bear no relation to objectively assessed housing needs that relate to the town. Although housing continues to be delivered, some as identified on allocated sites, the majority is on windfalls. 5 Year Housing Land Supply is now assessed against the trajectory identified in the submitted WNJCS.</p>	<p>The proposals contained in the adopted Local Plan were formulated to contribute to housing need. However, it is significantly different from the local plan in that it is not based on a rolling supply of specific deliverable sites sufficient to provide at least 5 years worth of housing against an identified requirement.</p> <p>The housing policies in the West Northamptonshire Joint Core Strategy were based on a list of updated evidence base including the Objectively Assessed Needs, the SHMA and the SHLAA. They are responsible coordinating the Joint Annual Monitoring Report, although Northampton Borough Council prepares the 5 year land supply.</p>
<p><b>Illustrate the expected rate of housing delivery</b></p>	<p>The end date of the Northampton Local Plan was 2006. There was no trajectory identified or</p>	<p>The CAAP identifies some sites to meet the overall five-year housing requirement for Northampton. However</p>

<p><b>through a trajectory and set out a housing implementation strategy describing how a five year supply will be maintained (47).</b></p>	<p>implementation strategy describing how a 5 year supply will be maintained.</p>	<p>the need and overall requirement is set within the Joint Core Strategy.</p> <p>Much of the housing land identified within the CAAP is brownfield, which is consistent with the role of the CAAP to regenerate and draw investment into the centre of Northampton.</p>
<p><b>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50), and caters for housing demand and the scale of housing supply to meet this demand (para 159)</b></p>	<p>The Northampton Local Plan has policies that cater for a mix of housing (NPPF para 50 compliant) through the following saved policies H6, H17, H30, H32, H34 – which includes provision for affordable housing, housing for people with disabilities and dwellings in multiple occupation.</p> <p>Housing demand was identified through the then Northamptonshire Structure Plan, and the local plan confirmed that there has not been a problem in identifying a five year land supply of available housing land in Northampton. However, the plan does not include phasing related policies and there is no evidence at that time that this was required.</p> <p>Policy H32 states that the Council will negotiate an element of affordable housing, the level of which will depend on the identified need for such housing in the vicinity and site / market conditions.</p> <p>An Interim Planning Policy Statement on Affordable Housing has been approved by the Council's Cabinet, which provides further guidance on affordable housing based on Policy H32 and more up-to-date evidence base on local needs.</p>	<p>These policies are not dissimilar to the requirements of the NPPF in that they seek to provide a range of units to meet differing requirements, including affordable housing.</p> <p>The difference lies in the objectively assessed need. As the plan was prepared some time ago, it was prepared in accordance with a Government Circular which guided development policies at that time.</p> <p>In delivering the West Northamptonshire Joint Core Strategy, the West Northamptonshire Joint Planning Unit has completed the Objectively Assessed Needs. The findings were subject to Examination in March 2014. The findings resulted in dwelling provision being increased for the Northampton Related Development Area and the plan period timeline extended to 2029.</p> <p>The preparation of the Northampton Related Development Area Local Plan will take this requirement forward through site allocation and phasing.</p>
<p><b>In rural areas be responsive to local circumstances and plan</b></p>	<p>Northampton is an urban area and the existing adopted policy and interim statement provides information about thresholds, definition and</p>	<p>This is not significantly different to the NPPF as the Interim Statement includes principles which take into account the requirements of the NPPF. This means</p>

<p><b>housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</b></p>	<p>delivery.</p>	<p>that the policy and principles are responsive to local circumstances.</p>
	<p>Policy H10 of the adopted Local Plan provides policy direction on backland developments. These will be resisted unless it can be evidenced that the character and amenity of the locality, or privacy of residents, will not be adversely affected.</p>	<p>This is not significantly different to the NPPF.</p>
<p><b>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</b></p>	<p>Northampton is an urban area so this is not applicable.</p>	<p>Not applicable.</p>

**7. REQUIRING GOOD DESIGN (PARAS 56-68)**

There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.

**8. PROMOTING HEALTHY COMMUNITIES (PARAS 69-78)**

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><b><i>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</i></b></p>	<p>The Local Plan includes policies which aim to provide for community facilities and local services including childcare facilities, recreational and leisure, and community use of existing schools and colleges.</p> <p>The policies are: H35, L1, L2, L3, L4, L6, L10, L12, L13, L20, L24, L25, L26</p>	<p>The policies focus primarily on land use and safeguarding but do include some reference to management.</p> <p>The West Northamptonshire Joint Core Strategy includes policies which are based on up-to-date evidence base for community facilities and these include Policies RC1 and RC2.</p> <p>The Northampton Related Development Area (NRDA) Local Plan will take these policies forward through site allocations and development management policies. Further updated evidence base has been completed to inform policy direction within the NRDA Local Plan.</p> <p>The adopted CAAP proactively plans for a range of services and regeneration projects for the wider benefit of Northampton.</p> <p>The CAAP does not specifically plan for community facilities explicitly as it is principally focused on the regeneration of the Central Area. As such, the whole plan is concerned with the delivery of facilities for the public and enhancing the overall sustainability of the town centre.</p>

		<p>The plan does identify the redevelopment / regeneration of some facilities of community value, such as the Fish Market, the existing Central Library and the bus interchange. However, in all cases, an opportunity for replacement facilities has been formulated to ensure that the service remains within the Central Area. Furthermore, it is recognized that the regeneration and revitalization of the town is necessary to secure the long-term future of the shops and facilities within Northampton and to allow Northampton to perform as the county town.</p> <p>The Central Area Action Plan, through a number of policies seeks to increase the attractiveness of key infrastructure (transport)- such as an improved Rail Station and Bus Interchange to benefit the wider town.</p> <p>Furthermore, there are policies within the plan (such as Policy 24: Spring Boroughs) that seek to positively and proactively work with the communities who live within the Central Area to deliver local facilities, including convenience retailing or other community spaces, to meet the needs of those living within the Central Area of Northampton.</p>
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## 9. PROTECTING GREEN BELT LAND (PARAS 79-92)

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82)</p>	<p>No Green Belt Land within the plan area.</p>	<p>Not applicable.</p>

## 10. MEETING THE CHALLENGE OF CLIMATE CHANGE FLOODING AND COASTAL CHANGE (PARAS 93-108)

What NPPF expects local plans to include to deliver its objectives	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).</p>	<p>The challenge of coastal change does not apply.</p> <p>In relation to challenge of climate change, including impacts of flooding, the Northampton Local Plan includes generic policies which seek to avoid effects on the environment, plan for mitigation and the use of renewable energy. These include saved policies E39, B31 and B32.</p> <p>The Council is in the process of preparing an Energy Efficiency and Design SPD which will build on these policies, the West Northamptonshire Joint Core Strategy and the CAAP</p>	<p>These policies are significantly different from the NPPF in that they focus on mitigation rather than provide clear directions on a wide ranging set of measures and considerations.</p> <p>These differences are addressed in the West Northamptonshire Joint Core Strategy and the CAAP which contain policies on flooding, flood risk and infrastructure requirements (to include water supply). There are no immediately identifiable differences as developments coming forward within the CAAP area will need to be consistent with Policy 1 and the JCS which contains a policy relating to overarching sustainability matters including water resources, sustainable design and codes to deliver low carbon buildings.</p> <p>Relevant policies in the JCS includes S10 and S11 on</p>

		<p>sustainable development principles, and low carbon and renewable energy; policies NB7a and BN7 on water supply and flooding.</p> <p>The CAAP applies the sequential test to development as a means to take account of the flood risk within Northampton's Central Area. Policy 5 also seeks to address flooding from Surface Water sources.</p> <p>The Central Area Action plan has been drafted to encourage development within the centre of Northampton, which is accessible by more sustainable modes of transport.</p>
<p><b>Help increase the use and supply of renewable and low carbon energy (97).</b></p>	<p>The Northampton Local Plan includes a generic policy, supporting developments which involve renewable energy installations designed to generate energy from the sun, wind, water or waste material. It does not allocate/ identify areas which are considered suitable for renewable and low carbon energy sources or supporting infrastructure to help secure these.</p>	<p>There is a significant difference in that the Northampton plan policy is too generic and does not provide enough details or guidelines to ensure that sustainable means of development are promoted.</p> <p>This is addressed by the Joint Core Strategy (policy S11 in particular).</p> <p>CAAP policy 1 (point 5) requires new development proposals to design for energy and resource efficiency within new developments.</p> <p>Neither the JCS nor the CAAP identify areas suitable for suitable and renewable low energy sources. This could be incorporated in the Northampton Related Development Area Local Plan.</p>

**11. CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT (PARAS 109-125)**

<p><b>What NPPF expects local plans to include to deliver its objectives</b></p>	<p><b>Does your local plan address this issue and meet the NPPF's expectations?</b></p>	<p><b>How significant are any differences? Do they affect your overall strategy?</b></p>
<p><b>Planning policies should minimise impacts on biodiversity and geodiversity (para 117).</b></p> <p><b>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).</b></p>	<p>The Northampton Local Plan includes policies affecting the natural environment – which themselves help to minimize impacts on biodiversity. These include the policies relating to the environment, recreational and landscaping.</p>	<p>The difference is that the Local Plan policies does not deal specifically with biodiversity, rather they seek to address the protection and management of the sites where biodiversity is an issue.</p> <p>These have been addressed in the JCS (BN2, BN3 and BN4) and the NIA is also shown in the CAAP Proposals Map.</p> <p>The Nature Improvement Area was identified following plan preparation. The development proposed either within or adjoining the area is considered to be appropriate and would not unduly impact on biodiversity within the river environment.</p> <p>Due to the Special Protection Area at the Upper Nene Gravel Pits, both the JCS and the CAAP has undergone rigorous assessment through the Habitat Regulations Assessment process and the existing proposals are not considered to have a negative impact.</p>



**12. CONSERVING AND ENHANCING THE HISTORIC ENVIRONMENT (PARAS 126 – 141)**

There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.

**13. FACILITATING THE SUSTAINABLE USE OF MINERALS (PARAS 142-149)**

<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<b>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142).</b>	Not relevant to the CAAP.	Not relevant