



## CABINET REPORT

<b>Report Title</b>	<b>Northampton Local Plan Part 2 – responses to Sites Consultation</b>
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**AGENDA STATUS: PUBLIC**

<b>Cabinet Meeting Date:</b>	14 <sup>th</sup> March 2018
<b>Key Decision:</b>	NO
<b>Within Policy:</b>	YES
<b>Policy Document:</b>	NO
<b>Directorate:</b>	Regeneration, Enterprise & Planning
<b>Accountable Cabinet Member:</b>	Councillor Tim Hadland
<b>Ward(s)</b>	All

### 1. Purpose

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- 1.1 To inform Cabinet of comments received on the Local Plan Part 2 Sites Consultation, officer responses and next steps.

### 2. Recommendations

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- 2.1 That the comments received on the Local Plan Part 2 Sites Consultation and the officer responses are noted and used to inform production of the Local Plan Part 2.

### **3. Issues and Choices**

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#### **3.1 Report Background**

- 3.1.1 The Council is in the process of producing a Local Plan Part 2 which will provide detailed planning policies to manage and guide development across the borough. It will replace existing saved policies from Northampton Local Plan, June 1997 and the Central Area Action Plan, January 2013. The Local Plan Part 2 will accord with the more strategic policies in the West Northamptonshire Joint Core Strategy and set out more detailed site-specific policies and policies to help guide development management.
- 3.1.2 Cabinet will be aware that the Council has previously carried out public consultation on the scope and key issues that the Local Plan Part 2 should address (Issues Consultation May / June 2016). The Options consultation of September / November 2016 set out a draft vision and objectives for the Local Plan Part 2 and sought opinions on a number of options for matters to be included in the Plan.
- 3.1.3 The Sites Consultation ran from 2<sup>nd</sup> October to 13<sup>th</sup> November 2017. Its purpose was to gather views on potential future sites for housing and employment to deliver the strategy and development targets set out in the West Northamptonshire Joint Core Strategy. The Sites Consultation contained two lists of sites. The first was a set of sites considered suitable for further consideration in putting together the Local Plan Part 2 and the second was a list of sites not being taken forward for further investigation. These two lists were informed by the evidence contained in the Council's Land Availability Assessment. Comments received on the Sites Consultation will be fed into the process of producing the Proposed Submission version of the Northampton Local Plan Part 2.

#### **3.2 Issues**

- 3.2.1 The Council received more than 500 comments from 66 different parties, including members of the public, landowners, developers, agents and statutory consultees including neighbouring councils. These comments have been analysed and officer comments have been made on each one. They are listed at Appendix A and will be posted on the Council's website. Comments that are not site-specific have been grouped at the beginning of the appendix followed by site-specific comments in number order. The Sites Consultation document, which includes site maps, is attached at Appendix B for information. It should be noted that, as well as commenting on sites in the Sites Consultation document, Anglian Water Services have commented on every site that was in the Council's Land Availability Assessment (LAA), including those that were discounted from the Sites Consultation for reasons such as being below the size threshold, having an existing planning permission or being built out already.

- 3.2.2 The comments received fell into a series of broad themes as follows:

- Sites

- Technical evidence
- Housing delivery
- Land Availability Assessment methodology
- Sustainability Appraisal and Habitats Regulations Assessment
- Consultation process

### Sites

- 3.2.3 For the majority of sites for which comments were received, most of the comments were of a technical nature from statutory consultees, such as the Environment Agency and the Homes and Communities Agency, local interest groups and by site promoters and prospective developers. These included comments from developers and / or their agents giving reasons why the sites they were promoting could be developed more quickly than had been estimated in the Sites Consultation Paper or that the site had a different capacity from the one set out in the Site Consultation Paper. Such comments will need to be investigated further as part of the process of site selection. They will clearly have an impact on the potential capacity for new housing identified and the timing of the delivery of that capacity, which are discussed later in this report.
- 3.2.4 Of the 76 sites set out in the Sites Consultation Paper as being worthy of further consideration, only eleven received objections from parish councils, neighbourhood forums and local residents. The main concerns expressed were about the impact on the local community, infrastructure implications (including traffic and services), and the relationship to Neighbourhood Plans' intentions for sites. These concerns will need to be factored into considerations about whether or not sites should be selected for inclusion in the Local Plan Part 2.
- 3.2.5 For a number of sites in and around the town centre, representations were received suggesting that the mix of uses could be widened, to include residential/ student accommodation at the Belgrave House and Eastern Island sites and, additionally, commercial at Eastern Island. For the Railway Station Car Park, representations were made that, alongside residential, retail and leisure should form part of the development of this site. The Council was previously aware of this, but this consultation was only concerned with the residential and Class B (offices, industry and warehousing) elements of development.
- 3.2.6 For several sites that had been assessed as not being taken forward for consideration, further information has been submitted about their availability which means they could be considered for inclusion in the Local Plan Part 2. These sites include land at Rowtree Road, with a potential capacity of up to 131 dwellings, land at Castle Station (to the north of the existing car park), with a potential capacity of approximately 200 dwellings, land close to Teal Close (part of a larger site previously rejected for lack of information about its availability), with a potential capacity of approximately 220 dwellings and land at Bants Lane (part of a larger site, formerly considered only available for Class B uses) with a potential capacity of approximately 195 dwellings.

- 3.2.7 For the Ransome Road / Nunn Mills site, further information has been submitted which may alter the extent of the developable area and means that potential capacity could change, though precise details had not been submitted at the time of writing this report. Information submitted by the agent about land west of the allocated Northampton South (Collingtree) SUE suggests that the site capacity should be revised down from 264 to 100 dwellings.
- 3.2.8 Two new housing sites in the borough have been submitted to the Council. The first is at Wootton Fields on land adjacent to Caroline Chisholm School with a potential capacity of approximately 90 units. The second is on land south of Bedford Road close to The Limes, with a potential capacity of 40 units. Two further sites were also submitted, both outside the borough boundary, one west of Ecton and the other at Overstone Farm, as part of a proposed alternative approach to dealing with the slower than predicted rate of housing delivery at the sustainable urban extensions within Northampton.

#### Technical evidence

- 3.2.9 There were a number of comments on technical matters by statutory consultees to the effect that further technical work would need to be done when sites were considered in more detail for inclusion in the Local Plan Part 2. Highways England commented that there is a need to assess the impact of developments proposed within three miles of the strategic highway network (the A45 and the M1), including specific junctions. The assessment process for determining the suitability of sites for allocation will include technical work to assess the impact of additional traffic on the strategic road network.
- 3.2.10 Sport England raised concerns about potential losses of open space, both incidental and sports pitches. These concerns will be considered, alongside the Council's latest evidence on open space and sports provision, as part of the assessment process for determining the suitability of sites for allocation.
- 3.2.11 The Environment Agency and Anglian Water both made submissions to the effect that new and updated site-specific information on flooding and wastewater impacts would be needed in the process of assessing sites for allocation in the Local Plan Part 2. Northamptonshire County Council made specific comments on impacts on wildlife and archaeology, making the point that there will need to be appropriate mitigation for wildlife if development occurs on a number of sites, particularly those within three kilometres of the Upper Nene Valley Gravel Pits Special Protection Area. They also commented that further evaluation will be need to assess potential impacts on heritage assets, including archaeology.
- 3.2.12 Northampton Borough Council's Environmental Protection Team made a number of submissions on many sites around the borough highlighting the need to factor noise, vibration, air quality and land contamination into the Council's assessment process in determining whether or not sites should be allocated in the Local Plan Part 2. These points will need to be included in further technical work at that stage in the plan-making process, along with those made by others. It may be the case that these issues could be capable

of mitigation with the implementation of appropriate measures and addressed at the planning application stage through the use of planning conditions.

3.2.13 Historic England raised concerns that the analysis carried out in the LAA was insufficient to deliver the Government's objectives for the historic environment. However, they noted that the Sustainability Appraisal addressed this issue more fully, but they noted that there was still uncertainty in relation to potential impacts on heritage assets and the implications of heritage considerations on the developability and capacity of development sites. It is important to note that no firm decisions have been made about which sites might be allocated in the Local Plan Part 2. The comments made by Historic England will be used to inform the next stages of plan making. The analysis carried out as part of the Sustainability Appraisal is only an initial screening. More detailed evaluation will be required as sites are taken forward.

#### Housing delivery

3.2.14 Both South Northamptonshire Council and Daventry District Council welcomed the identification of sufficient housing capacity in the borough.

3.2.15 South Northamptonshire Council (SNC) and a developer raised concerns about the windfall assumptions set out in the Site Consultation Paper stating that there was an over-reliance on windfalls. SNC's view was that windfall assessments should be based on longer term data and that more detail will be needed on expected delivery rates, particularly on the Sustainable Urban Extensions. They also suggested that all sites, including smaller sites should be allocated in the Local Plan Part 2 to speed up delivery and that capacity in the borough needed to be maximised. These issues will need to be factored in to further work on how the requirement will be delivered during the plan period.

3.2.16 Developers also commented that there was a need to build flexibility into allocations and that a number of sites do not need to be allocated because they would come forward through the permitted development rights or the planning applications. These points are noted, but it is important that sites are allocated to enable development to take place with an element of policy control.

#### Land Availability Assessment methodology

3.2.17 South Northamptonshire Council commented that it was unclear why some sites, particularly leisure and open spaces and potential extensions to villages on the edge of Northampton had been included as sites for further consideration, and some not. However, the sites were considered on the basis of a clearly stated methodology. Further, more detailed, consideration of sites will be given in working towards site selection for the next phase of plan-making.

#### Sustainability Appraisal and Habitats Regulation Assessment (SA and HRA)

3.2.18 Natural England indicated their support for the approach taken for mitigating the possible effects of development on the Upper Nene Valley Gravel Pits

Special Protection Area. A site promoter disagreed with the appraisal and a housebuilder said was concerned that, because the SA and HRA only assessed sites that were being taken forward for further consideration, the Council's approach was limiting. The SA and HRA processes are iterative, however, and all sites that go forward to the next stages of plan-making will be the subject of further analysis in this regard.

### Consultation Process

3.2.19 One member of the public thought that the Council had not raised sufficient awareness about the Sites Consultation. It should be noted that the consultation accorded with the Council's Statement of Community Involvement, which sets out how the Council will engage with the local community and other stakeholders throughout the preparation of the Local Plan. The consultation also complied with statutory requirements.

### Next steps

3.2.20 Theoretically, the new information about potential housing sites would increase the housing capacity identified for the borough from 2011 to 2029 from 22,587 dwellings to 22,884 dwellings. It also suggests a substantial increase in the number of dwellings that could be built within the next five years, rather than later in the plan period. However, it needs to be borne in mind that more detailed analysis needs to be carried out for all of the sites submitted to the Council, as well as those already set out as worthy of consideration in the Sites Consultation document.

3.2.21 Over the coming few months, all of the comments submitted at all stages of Local Plan Consultation will be considered, alongside the existing evidence base and further research and evidence. This will be used in the selection of sites for allocation in the Proposed Submission version of the Local Plan Part 2, which will address the supply of sites in the Borough to deliver more homes, maintain and expand employment opportunities, enhance the town centre, protect the historic and natural environment, and provide detailed development management policies for the Borough as a whole.

## **3.3 Choices (Options)**

### **Option 1: Agree**

3.3.1 If Cabinet agree to note the comments received and the officer responses, this will give officers a firm basis for proceeding with the tasks involved in producing the Proposed Submission version of the Local Plan Part 2.

### **Option 2: Do not agree**

3.3.2 Cabinet could defer or decide not to note the comments received and officer responses to the Local Plan Part 2 – Sites Consultation. However, these comments would still have to be taken into account in preparing the Local Plan Part 2.

## **4. Implications (including financial implications)**

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### **4.1 Policy**

- 4.1.1 The Sites Consultation is an important part of the process of putting together the Local Plan Part 2 as it will inform the process of allocating new housing and employment sites. The Local Plan Part 2 will help to deliver the strategy set out in the West Northamptonshire Joint Core Strategy, which is Part 1 of the Local Plan for Northampton, Daventry and South Northamptonshire. As such, it will address the supply of sites in the Borough to deliver more homes, maintain and expand employment opportunities, enhance the town centre, protect the historic and natural environment, and provide detailed development management policies for the Borough as a whole.

### **4.2 Resources and Risk**

- 4.2.1 There are no financial implications arising directly from the contents of this report. The need to commission more evidence to support the next stages of plan production has been foreseen and can be financed out of existing budgets.

### **4.3 Legal**

- 4.3.1 In accordance with Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations, the Local Plan Part 2 Sites Consultation was carried out in line with Council's Statement of Community Involvement. This regulation requires the Council to take into account any response made to a Local Plan consultation.

### **4.4 Equality and Health**

- 4.4.1 The comments received and the officer responses do not, in themselves, constitute policies and, accordingly, an Equality Impact Assessment is not required.

### **4.5 Consultees (Internal and External)**

- 4.5.1 The Council consulted members of the public, landowners, developers, agents and statutory consultees including neighbouring councils and the Council's Environmental Protection team. Information and adverts were placed in the Northampton Chronicle & Echo as well as on the Council's website, information was made available in the Guildhall One Stop Shop and local libraries and everyone currently listed on the local plan consultation database was notified about the consultation.

## **4.6 How the Proposals deliver Priority Outcomes**

4.6.1 The Local Plan Part 2 will include policies to protect the environment, provide for new housing and facilitate economic growth.

## **4.7 Other Implications**

4.7.1 There are no other implications arising from this report.

## **5. Background Papers**

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5.1 Appendix A – Northampton Local Plan Part 2 Sites Consultation – Comments Received and Officer Responses, February 2018.

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