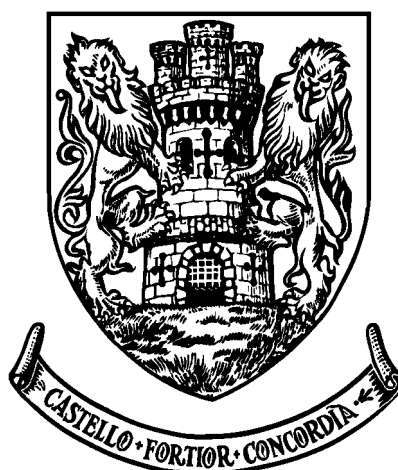


NORTHAMPTON BOROUGH COUNCIL



COUNCIL

Monday, 18 January 2021

YOU ARE SUMMONED TO ATTEND A MEETING OF NORTHAMPTON BOROUGH COUNCIL, WHICH WILL BE HELD REMOTELY VIA ZOOM:

[HTTPS://WWW.YOUTUBE.COM/USER/NORTHAMPTONBCTV](https://www.youtube.com/user/northamptonbctv) ON MONDAY, 18 JANUARY 2021 AT 6:30 PM WHEN THE FOLLOWING BUSINESS IS PROPOSED TO BE TRANSACTED

1. DECLARATIONS OF INTEREST

2. MINUTES.

To approve the minutes of the proceedings of the Meeting of the Council held on 14th September, 28th September and 2nd November 2020.

3. APOLOGIES.

4. MAYOR'S ANNOUNCEMENTS.

5. PUBLIC COMMENTS AND PETITIONS

6. MEMBER AND PUBLIC QUESTION TIME

7. CABINET MEMBER PRESENTATIONS

8. OPPOSITION GROUP BUSINESS

Councillor Stone to make a statement on "Looking Ahead"

9. NORTHAMPTON LOCAL PLAN PART 2: SUBMISSION VERSION

10. COMMUNITY GOVERNANCE REVIEW - NEXT STEPS (A)

11. COMMUNITY GOVERNANCE REVIEW - NEXT STEPS (B)

12. NOTICES OF MOTION

- i) Councillor Cali to propose and Councillor Ashraf to second:

Fireworks have gone from being a once a year, bonfire night event to being used throughout the year to mark many different events. In fact, over Christmas and New year they seem as popular as on Guy Fawkes. While they can bring much enjoyment to some people, they can cause significant problems and fear for animals and other people.

It is not only domestic animals but also farm livestock and wild animals who can suffer psychological distress and injuries, sometimes very serious ones, as they attempt to run away or hide from the noise.

The unpredictable loud and high intensity noises that many fireworks make can cause fear.

The RSPCA believes the law is failing as it does not prevent or sufficiently reduce the risk of fireworks causing distress, injury or anxiety to people, as well as death, injury or distress to animals.

The RSPCA believes that further research is needed to properly understand the impact of noise on animals and a number of things can be done to improve the situation for animals and people by:

- introducing a limit on the public use of fireworks on or close to specific dates and times
- tightening restrictions on the sale of fireworks in the run up to Bonfire night
- reducing the maximum noise level of fireworks sold to the public, ensuring they are labelled accurately
- licensing all public firework displays – and ensuring displays are better advertised to the public.

Whilst we recognise that this is a regulated activity, the regulation of which is via trading standards through the County Council, we believe that Northampton Borough Council can play a part in supporting the RSPCA campaign.

This Council resolves:

1. to require all public firework displays within the local authority boundaries to be advertised in advance of the event, allowing residents to take precautions for their animals and vulnerable people.
2. to actively promote a public awareness campaign via social media and other 'Let's Talk' opportunities about the impact of fireworks on animal welfare and vulnerable people – including the precautions that can be taken to mitigate risks.
3. that the Leader of Northampton Borough Council write to the UK Government urging them to introduce legislation to limit the maximum noise level of fireworks to 90dB for those sold to the public for private displays.
4. to share this information with the local suppliers of fireworks to encourage them to stock 'quieter' fireworks for public display.

13. MATTERS OF URGENCY WHICH BY REASON OF SPECIAL CIRCUMSTANCES THE MAYOR IS OF THE OPINION SHOULD BE CONSIDERED.

George Candler – Chief Executive
The Guildhall
Northampton

Public Participation

1. Comments and Petitions

- 1.1 A member of the public (or an accredited representative of a business ratepayer of the Borough) may make a comment or present a petition on any matter in relation to which the Council has powers. A comment or presentation of a petition shall be for no more than three minutes. No notice of the nature of the comment to be made or of the petition is required except for the need to register to speak by 12 noon on the day of the meeting.

(Public comments and petitions will not be taken at the Annual Council Meeting or other civic or ceremonial meetings.)

NOTES

- i. Comments may be on one or more subjects but each person has no longer than three minutes to have their say.*
- ii. The same person may make a comment and present a petition on different subjects. In such instances that person will have three minutes to make their comment and a separate three minutes to present a petition.*

2. Member and Public Questions

- 2.1 A member of the public (or business ratepayer of the Borough) may ask a maximum of two written questions at each meeting, each limited to a maximum of 50 words, on any matter in relation to which the Council has powers. Each question shall:
- be submitted in writing and delivered, e-mailed to Democratic Services no later than 10.00am seven calendar days before the day of the meeting; and
 - include the name and address of the questioner and the name of the Cabinet member/Committee Chair to whom the question is put.
- 2.2 At the meeting, copies of all questions and the responses to them from the public and Members will be made available to the public and press. The Mayor may allow one supplementary question, without notice, that arises directly from the original question or response.

(Questions will not be taken at the Annual Council Meeting or at civic or ceremonial meetings or meetings called to deal with specific items of business.)

NOTES

In respect of paragraph 2.1 above, questions may be rejected on certain grounds that are set out on page 4-12 of the Council's Constitution and which may be viewed at

www.northampton.gov.uk/site/scripts/download_info.php?fileID=1919 or by seeking advice using the contact details below.

3. Motions

- 3.1 A member of the public may register to speak to a motion under the ‘Notices of Motion’ item on the agenda. Registration to speak must be made to Democratic Services by 12 noon on the day to the meeting. Speaking to a motion is restricted to three minutes per person.

(The ‘Notices of Motion’ item will not be taken at the Annual Council meeting or meetings called for civic or ceremonial purposes.)

4. General

A member of the public may make a comment, present a petition, ask a question or speak to a motion at the same meeting subject to the restrictions set out above.

5. Contacts

Democratic Services: e-mail democraticservices@northampton.gov.uk

Tel 01604 837722

Fax 01604 837057

Mail Democratic Services
Northampton Borough Council
The Guildhall
St Giles Square
Northampton NN1 1DE

MINUTES

OF THE PROCEEDINGS OF A MEETING OF NORTHAMPTON BOROUGH COUNCIL HELD AT THE GUILDHALL, NORTHAMPTON, ON Monday, 14 September 2020 AT SIX THIRTY O'CLOCK IN THE EVENING

PRESENT: HIS WORSHIP THE MAYOR Councillor Sargeant (in the Chair).

COUNCILLORS: Malpas, Ansell, Ashraf, Aziz, Beardsworth, Birch, Bottwood, Cali, Choudary, Duffy, G Eales, T Eales, Eldred, Flavell, Golby, Graystone, Hadland, Hallam, Haque, J Hill, Joyce, Kilbride, King, Lane, Larratt, B Markham, M Markham, Marriott, McCutcheon, Meredith, Nunn, Oldham, Parekh, Patel, Kilby-Shaw, Smith, Stone and Walker

1. DECLARATIONS OF INTEREST

Councillor Stone declared an interest in respect of motion i) by virtue of being involved in various community organisations.

Councillor Patel declared an interest in respect of motion i) by virtue of being involved in various community organisations.

2. MINUTES.

The minutes of the meeting held on 20th July 2020 were agreed and signed by the Chair.

3. APOLOGIES.

Apologies for absence were received from Councillors Russell, Roberts, Chunga and Davenport. It was advised that Councillor Golby would be joining the meeting late and Councillor Hibbert may not be able to join the meeting remotely due to connection issues.

4. MAYOR'S ANNOUNCEMENTS.

The Mayor announced that he visited the United African Association last week who were handing out welfare parcels to those in need during the pandemic. The Mayor thanked councillors who had donated to his charity and advised that there was still time to donate if they had not yet done so. Upcoming events included a meeting with the High Sheriff and Mike Ingram, who was releasing a book on the history of the Guildhall

5. PUBLIC COMMENTS AND PETITIONS

Anne Wankiiri, from United African Association, addressed Council and advised that the organisation was running out of space for their community work, including storage space for food parcels, and asked for the Council's support in acquiring a space. She thanked Councillor Stone for her help supporting residents struggling during the

pandemic.

6. MEMBER AND PUBLIC QUESTION TIME

The Mayor advised that thirteen questions had been received from Councillors and that the answers had been tabled in accordance with the Constitution. Questions and answers were given as tabled unless where stated, supplementary questions were asked as detailed below.

In response to a supplementary question relating to question 1, Councillor Hadland commented that improvements had been made to Victoria Street coach station, albeit limited, and that it remained a priority for the town centre.

In response to a supplementary question relating to question 2, Councillor Hallam advised that additional funds had been added to the 2020/21 budget in relation to maintaining trees. He informed Councillor Meredith that tree officers attended his ward on last week to conduct tree survey assessments.

In response to a supplementary question relating to question 4, Councillor Hallam stated that water refill stations were located mainly on highways which NBC had no remit over.

7. CABINET MEMBER PRESENTATIONS

Councillor Nunn submitted his report as Leader of the Council and highlighted the salient points. In response to questions, Councillor Nunn advised that capacity regarding covid testing was a national issue; he did not regret earlier advice he gave around getting tested if one had concerns but no symptoms, following the Greencore outbreak it was vital to have as many people as possible tested. The capacity issue was a shame and Councillor Nunn, and others, were urging Public Health England to rectify it as soon as possible. He advised that the videos he and Councillor Stone had worked on alongside the Northampton Association of Youth Clubs, were awaiting Councillor Stone's approval prior to being released. Councillor Nunn reassured Council that he and the Deputy Leader were working every day to safeguard the interests of Northampton and its people. With regard to unitary talks, Councillor Nunn advised that cross-party discussions were taking place and would be willing to have them more frequently if Members felt it necessary

Councillor Larratt submitted his report as Deputy Leader and highlighted the salient points. In response to questions asked, Councillor Larratt commented that due to declining footfall, trade on the market was higher during weekdays than weekends; he would pursue with officers and seek to join any campaigns being run by the National Association of British Market Authorities (NAMBA). Councillor Larratt would seek to arrange member briefing on rail issues and the Transport Strategy consultation. With regard to elections, Councillor Larratt advised that the Council was following the government's updated procedures; he was not aware of any online issues but would raise it with the Monitoring Officer. He further advised that the Council had sufficient capacity to carry out enforcement duties, however officers were not making as many visits due to covid-related restrictions. Regarding town council briefings, Councillor Larratt stated that making them publicly available may stifle debate but would consider alternative ways of promoting the work undertaken. Works

to the Gallery car park lighting was scheduled to finish in November and remedial works would continue afterwards. He assured Council that the work would be completed.

Councillor Hallam presented his report as Cabinet Member for Environment and highlighted the salient points and thanked the Neighbourhood Wardens, Park Rangers and officers in the Environmental Health department for the additional work undertaken during the pandemic. In response to questions, Councillor Hallam stated that although the amount of household recycling had reduced in March, the amount being collected had increased when compared to previous years. With regard to the recently introduced E-Scooter scheme, Councillor Hallam explained that he had not been consulted in his capacity as Cabinet Member for Environment, however he and Councillor King were consulting with NCC to suggest improvements to the scheme.

Councillor King presented her report as Cabinet Member for Community Engagement and Safety and highlighted the salient points. She advised that Diwali and Bonfire night celebrations run by the Council would be online. She advised that an app for the town was being developed by AR Media which would include various engagement tools. Michael Ellis recently joined an LGBTQ Forum meeting and would report back the results of a consultation around the Gender Recognition Act. In response to questions, Councillor King advised that the Council promoted good practice by way of "Days/Weeks of Action" that were held throughout the year. She advised that more applications for covid funding had been received since the report was written but encouraged all Members to continue to promote the available funding to the public. Councillor King stated that she wanted the E-Scooter scheme to work well and confirmed that she was working with NCC, alongside Councillor Hallam, to make improvements.

Councillor Eldred submitted his report as Cabinet Member for Finance and highlighted the salient points; graphs previously requested by Members had been included for ease of understanding. Councillor Eldred thanked the Facilities team for their hard work in keeping the Guildhall safe for officers still coming in to work.

8. OPPOSITION GROUP BUSINESS

Councillor Stone made a statement on "Good governance is a democratic issue". She stated that increased public cynicism and suspicion of government and the rise of "fake news" was a concern generally and that it was the job of elected members to build a foundation with residents founded on trust. She noted that since the NTFC loan improvements had been made including the Council investing more in governance, an independent person Chairing the Audit Committee which receives reports on governance strategy and issues. However Councillor Stone stated that the 3-tier audit system was unwieldy and questioned why the audit reports from LGSS did not form part of the internal audit reports. She further stated that an administration could not scrutinise itself and noted that the 2018 Max Caller report into NCC highlighted it as an issue and a failure. Councillor Stone felt that the Overview and Scrutiny Committee should be headed by the opposition and that the Council should be making more use of pre-decision scrutiny. Local government reorganisation would provide the new unitary authority a new start and a new social contract with residents, Councillor Stone stressed the importance of maximising turnout at the polls so that

the administration had a sound democratic base that was accountable to the electorate. With covid, the importance of trust had been highlighted; if people trusted the messengers, they would trust the message and compliance would be high. Councillor Stone commented that governance should be outcome and performance focussed.

Councillor Nunn stated that generally, where larger numbers of people were involved, better decisions were made and supported. He noted that the Governance Acton Plan fed into all aspects of the Council. Councillor Nunn stated that the Council performed well in terms of scrutiny but welcomed any ideas from members about how it might be improved.

Councillor Stone reiterated that whilst Councillor Lane was a highly effective Chair, it seemed good practice for the Overview and Scrutiny Committee to be chaired by a member of the opposition. She suggested that a Finance Scrutiny panel set up to monitor covid implications and the expected income shortfall. Councillor Stone expressed concern around LGSS and the levels of financial information they provided.

9. OVERVIEW AND SCRUTINY ANNUAL REPORT 2019/2020

Councillor Lane, as the Chair of the Overview and Scrutiny Committee submitted a report and thanked every member involved in the work of Scrutiny, specifically the Panel Chairs and members of the public for their suggestions. He thanked the Democratic and Member Services Manager for her continued hard work and noted his appreciation for her dedication to the role over the past 17 years.

Councillor Walker seconded the report.

Members discussed the various panel work that had been undertaken and thanked the officer and the Chair of the Overview and Scrutiny Committee for their dedication, and thanked Cabinet for being receptive to recommendations that the Scrutiny Panels put forward.

RESOLVED:

Council noted the Overview and Scrutiny Annual Report 2019/2020.

10. HOUSING REVENUE ACCOUNT (HRA) CAPITAL PROGRAMME BUDGET

Councillor Eldred presented a report which sought to approve an additional £50M of HRA capital programme expenditure funded through borrowing, for the acquisition of blocks of homes as element of delivering affordable homes on major developments, land and/or existing properties. He noted that over 300 families were in temporary accommodation, as well as homeless families and many on the Council's waiting list for housing. The additional funding would allow the Council to progress with schemes and opportunities for accommodation in the town.

Councillor Nunn seconded the report.

Councillor Stone stated that she was concerned the housing crisis would get worse

due to the moratorium on evictions soon coming to an end. She stated that retaining homes was just as important as building them.

Councillor Beardsworth commented that the Council had been crippled by the Right to Buy scheme and suggested that it be “frozen” so that more council houses were not lost during the pandemic.

Councillor Eldred confirmed that each housing scheme would come to Cabinet for review and approval and borrowing would take place if and when schemes were brought forward.

RESOLVED:

Council:

- a) Approve an additional £50M of HRA capital programme expenditure funded through borrowing, for the acquisition of blocks of homes as element of delivering affordable homes on major developments, land and/or existing properties.
- b) That Cabinet be authorised to approve new capital schemes and variations to existing schemes, subject to a business case, the funding being available and the schemes being in accordance with the objectives and priorities of the Council

11. UPDATE ON CARRIED MOTIONS

Councillor Larratt presented a report on Carried Motions and asked Members to email Democratic Services with questions or further information on specific motions.

Councillor Smith acknowledged that work around the motions had slowed down during the pandemic and stressed the importance of finding ways to keep up momentum where work had been delayed.

Councillor Birch expressed concern around issues relating to libraries in the town.

Councillor Larratt commented that there was 1 library in Northampton that still had issues outstanding and work was being done with the local community to resolve them.

RESOLVED:

1. Council noted the update on Carried Motions.
2. That a further update would be brought to full Council at its meeting on 8 March 2021

12. NOTICES OF MOTION

- i) Councillor Stone proposed and Councillor Ashraf seconded:

“Covid-19 has thrown into relief the need for more, for bigger, for better community hubs.

The pandemic has made already vulnerable households ever more vulnerable. Community groups like Revolution Zero CiC, and Zimwomen with the United African Association, have worked really hard to keep marginalised households fed.

Their success has brought its own pressures. Both organisations need food storage spaces as well as distribution points.

Socially isolated older people need safe spaces where they can engage with each other and carry out activities safely. We need general day centres and specialist day centres, like an African Centre, where the needs of all our communities can be safely met.

Young people need safe spaces where they can engage with each other and carry out activities safely. The need for a youth centre has never been greater. We need to rethink our relationship with the voluntary sector. We need to see them as the warp and weft of our communities. These are the organisations and the people that are keeping our communities going. They all need premises. We call on the council to work with all these agencies to create a community hub with shared storage and safe meeting spaces.”

Council debated the motion.

Upon a vote, the motion was lost.

- ii) Councillor Haque accepted an alteration to the original motion as published on the agenda. The altered motion was seconded by Councillor Birch.

“We are alarmed at the Government’s proposal to give additional development rights to developers. The proposal risks a will bypass of the planning system and potentially leading to development that is neither strategic nor of good quality.

The housing crisis and the climate emergency means we need affordable, good quality, energy efficient homes.

We therefore call on the Council to write to Government expressing our concern at their proposal for deregulation.

We further call on the council to take all necessary steps to ensure that where housing is developed on commercial sites under the new regulations, that 35% of the housing is affordable and all are of a quality consistent with our aspiration to provide the best we can.

We note the cross-Party support from this Council to the substance of this motion and that of the detail in Motion III, and in addition, that the Local Government Association have also raised concerns regarding how it may restrict the decision making that local authorities have in future planning applications and developments.”

Council debated the motion.

Upon a vote, the motion was carried.

- iii) Councillor B Markham accepted an alteration to the original motion as published on the agenda. The altered motion was seconded by Councillor Beardsworth.

Council notes:

1. The publication by Government of the White Paper, 'Planning for the Future' on 6 August 2020, which sets out proposals on reforms to the planning process for the future.
2. That the vast majority of planning applications are given the go ahead by local authority planning committees, with permission granted to around 9 out of 10 applications.
3. That research by the Local Government Association has said that there are existing planning permissions for more than one million homes that have not yet been started.

Council is concerned that the proposals seek to:

1. Reduce or remove the right of residents to have their say on applications in their communities.
2. Grant automatic rights for developers to build on land identified as 'for growth'.
3. Remove section 106 payments for infrastructure and their replacement with a national levy.

This Council Further notes:

1. The Royal Institute for British Architects called the proposals 'shameful and which will do almost nothing to guarantee delivery of affordable, well-designed and sustainable homes'. RIBA also said that proposals could lead to the next generation of slum housing.
2. The reforms are opposed by the all-party Local Government Association.

We note the cross-Party support from this Council to the substance of this motion and that of the detail in Motion II, and in addition, that the Local Government Association have also raised concerns regarding how it may restrict the decision making that local authorities have in future planning applications and developments.

We therefore ask the Chief Executive to write to the Minister of State for Housing & Planning and to our local Members of Parliament expressing our concerns."

Council debated the motion.

Upon a vote, the motion was carried.

iv) Councillor Hill proposed and Councillor King seconded:

“This council supports the Government’s ‘Kickstarter scheme’, helping create jobs for young people in Northampton, putting them at the heart of the town’s economic revival from the Covid-19 pandemic. We call upon local businesses to sign up to providing quality, 6-month, subsidised work placements for those aged 16-24 on Universal Credit, helping give them on the job training and experience to launch them into a career. We cannot allow young people to be left behind as a result of the pandemic, and schemes like this will be vital for creating jobs and giving young people the skills to access them. We encourage local employers to sign up today.”

Council debated the motion.

Upon a vote, the motion was carried.

13. MATTERS OF URGENCY WHICH BY REASON OF SPECIAL CIRCUMSTANCES THE MAYOR IS OF THE OPINION SHOULD BE CONSIDERED.

None.

The meeting concluded at 9:17 pm

MINUTES

OF THE PROCEEDINGS OF A MEETING OF NORTHAMPTON BOROUGH COUNCIL HELD AT THE GUILDHALL, NORTHAMPTON, ON Monday, 28 September 2020 AT SIX THIRTY O'CLOCK IN THE EVENING

PRESENT: HIS WORSHIP THE MAYOR Councillor Sargeant (in the Chair).

COUNCILLORS: Malpas, Ansell, Ashraf, Aziz, Beardsworth, Birch, Bottwood, Cali, Duffy, G Eales, T Eales, Eldred, Flavell, Golby, Graystone, Hadland, Hallam, Haque, Hibbert, J Hill, Joyce, Kilbride, King, Lane, Larratt, B Markham, M Markham, Marriott, McCutcheon, Meredith, Nunn, Oldham, Parekh, Patel, Russell, Sargeant, Kilby-Shaw, Smith, Stone and Roberts

1. DECLARATIONS OF INTEREST

None.

2. APOLOGIES.

Apologies for absence were received from Councillors Chunga, Davenport, Walker and Choudary.

3. PUBLIC COMMENTS AND PETITIONS

None.

4. REALIGNMENT OF THE REVENUE & BENEFITS SERVICE

Councillor Eldred presented the report which sought Council approval for the realignment of the Revenue and Benefits service which was necessary due to the demise of LGSS; this request was approved by Cabinet at a special meeting on 23rd September. It was proposed that a Lead Authority Model be adopted with the Lead Authority being Milton Keynes Council. There would be no change in the level of service provided and staff would not be TUPE transferred to Milton Keynes Council but would, in time, be transferred to West Northamptonshire Council. The most significant change would be that the Head of Revenue & Benefits would report to the Section 151 Officer at Milton Keynes Council.

Councillor Nunn seconded the report.

Councillor Stone thanked the Monitoring Officer for giving Members the opportunity to vote on the proposal and thanked the S151 Officer for his efforts in protecting staff. She noted that the Labour Group submitted a motion calling for a Northampton unitary authority which had cross-party support and further noted that Northampton had a larger population compared to Daventry and South Northants councils, would be providing and requiring around 80% of West Northamptonshire Council's budget. Councillor Stone felt that the report had been imposed upon the Council and commented that Members were being forced into making a rushed decision.

Councillor Beardsworth stated her disappointment that there were no assurances that staff would keep their jobs once transferred to West Northamptonshire Council. She felt that the report had been rushed through and implored the administration to fight harder for Northampton residents.

Councillor Birch stated that whilst she understood the reasoning behind the report, she questioned why it had happened in the way that it had and hoped that the Chief Executive and the administration would finalise the governance and agreements in order to protect staff and retain the culture of customer focus and efficiency.

Councillor Roberts expressed disappointment that the Council were being asked to make a decision so close to the deadline. She referred to paragraph 4.35 of the report and commented that there was not much in the way of guarantees or assurances for affected staff. Councillor Roberts further noted that whilst the realignment was due to the demise of LGSS, LGSS were referenced throughout the West Northamptonshire Council blueprint which she found concerning.

Councillor B Markham commented that his biggest concern related to staff who did a great job for some of the town's most vulnerable residents. He hoped that Councillors Eldred and Nunn would be able to assuage concerns raised by Members and echoed comments made by previous Members regarding how rushed the decision felt.

Councillor Meredith voiced concern around Revenue & Benefits staff being TUPE transferred to West Northamptonshire Council and the risk of redundancies. He disagreed with the decision to run the service from Milton Keynes Council.

Councillor Russell echoed concerns by fellow councillors and stated that the administration had 2 years to understand the issues around Revenue & Benefits and resolve them; now they had 4 days to find a solution.

Councillor Nunn confirmed that the move was a temporary one and that redundancies were not expected. The proposed recommendations were the best way to ensure a smooth continuation of the Revenue & Benefits Service.

Councillor Larratt stated that the Revenue & Benefits Service benefitted from the best staff and a manager at Milton Keynes Council with significant expertise in that area. He echoed Councillor Nunn's comments regarding a smooth continuation in service.

Councillor Eldred stated that the Council's priority was the staff and thanked the Monitoring Officer and Chief Finance Officer for their efforts in protecting staff. He hoped that Members who would be sitting on the West Northamptonshire Council would continue to support staff as they had done as Borough Councillors.

At this point the Mayor called for the report's recommendations to be voted upon.

RESOLVED:

Full Council:

2.1. Noted the recommendations considered and approved by Cabinet on 23rd September 2020 (Appendix 1), reproduced in 3.1.1, 3.1.2 and 3.1.3 below and to agree to the following recommendations.

2.1.1 Specifically considered and approved Cabinet's recommendation outlined in 3.1.3 and thereby agreed:
to change the service delivery model for the Revenues and Benefits Service to a Lead Authority Model, as outlined in this Full Council report and

2.1.2 delegated to the Chief Executive the power to negotiate and finalise the necessary collaboration, governance and legal agreements between the partners, in Consultation with the Leader of the Council and the Cabinet member for Finance.

The meeting concluded at 7:03 pm

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MINUTES

OF THE PROCEEDINGS OF A MEETING OF NORTHAMPTON BOROUGH COUNCIL HELD AT THE GUILDHALL, NORTHAMPTON, ON Monday, 2 November 2020 AT SIX THIRTY O'CLOCK IN THE EVENING

PRESENT: HIS WORSHIP THE MAYOR Councillor Sargeant (in the Chair).

COUNCILLORS: Malpas, Ansell, Ashraf, Aziz, Beardsworth, Birch, Bottwood, Cali, Choudary, Davenport, Duffy, G Eales, T Eales, Eldred, Flavell, Golby, Graystone, Hallam, Haque, Hibbert, J Hill, Joyce, Kilbride, Lane, Larratt, B Markham, M Markham, Marriott, Nunn, Oldham, Parekh, Patel, Russell, Sargeant, Kilby-Shaw, Smith, Stone, Walker and Roberts

1. DECLARATIONS OF INTEREST

None.

2. MINUTES.

The minutes of the meeting held on 28th September 2020 were agreed and signed by the Mayor.

3. APOLOGIES.

Apologies for absence were received from Councillors Meredith, Hadland, McCutcheon, Chunga and King.

4. MAYOR'S ANNOUNCEMENTS.

The mayor thanked Members for their contributions to his chosen charity from their covid empowerment funds which amounted to almost £6,000. He announced that he had visited Brampton Primary School and attended a virtual fundraiser for Go Gold for Alfie which raised £,1000. The Mayor attended a conference held by Northampton Town of Sanctuary and congratulated the organisation for their efforts in helping vulnerable people during such a difficult time. The Mayor also judged posters made by school children supporting work by the Community Engagement team to raise awareness about hate crime in schools.

Upcoming events included:

- Diwali, 7th November starting at 5:30pm, details of the event could be found through the Mayor's Office and Communications team.
- Remembrance Sunday, 8th November: the event would be virtual, and details could be found through the Mayor's Office.

The Mayor urged Members to note any emails regarding new or updated covid regulations, and asked Council to contact the Civic and Mayoral Officer to make

contributions to upcoming online events.

5. PUBLIC COMMENTS AND PETITIONS

The Mayor announced that six members of the public had registered to speak.

Robin Burgess, Anne Wankiiri and Rachel McGrath requested to speak before Motion i was debated, and Alice Whitehead, Joe Cole and Russel Horsey requested to speak before Motion ii was debated.

6. MEMBER AND PUBLIC QUESTION TIME

The Mayor advised that ten questions had been received by Councillors and that the answers had been tabled in accordance with the Constitution. Questions and answers were given as tabled unless where stated, supplementary questions were asked as detailed below.

In response to a supplementary question relating to question 1, Councillor Hallam explained that the Kingdom Enforcement contract was not currently operational due to Covid-19 restrictions, greatly reducing the number of Fixed Penalty Notices issued.

In response to a supplementary question relating to question 9, Councillor Larratt advised that the independent highways inspector was being funded by the Local Highway Authority.

In response to a supplementary question relating to question 10, Councillor Hibbert advised that Covid-19 and unitary elections had caused delays, however updates would be brought to future meetings.

7. CABINET MEMBER PRESENTATIONS

Councillor Nunn presented his report as Leader of the Council and highlighted the salient points. He noted the upcoming Remembrance Sunday and stressed the importance of the public staying at home and watching the virtual event instead. In response to questions, Councillor Nunn stated that the burden on the Environmental Services team was significant, but staff were coping under the circumstances and capacity levels were under constant review. Regarding the E-Scooter scheme, Councillor Nunn advised that progress had been made, they now had registration numbers so that the public could report them if they were found in unsuitable locations. Councillor Nunn stated that a more positive dialogue had been opened with NCC; the Council had made numerous responses, both formal and informal to consultations, including a "delivery robot" initiative.

Councillor Larratt presented his report as Deputy Leader and highlighted the salient points. In response to questions, Councillor Larratt advised that he would raise capacity issues regarding Democratic Services with the Monitoring Officer at their next meeting. The Community Governance Review Cross-Party Working Group would be considering asset transfers in due course. He advised that members of the public were entitled to postal votes and any applications for a postal vote would be duly processed; an all-postal vote election would require a change in legislation and there was no desire in central government for this to be done presently. Councillor Larratt assured Members that a member briefing on rail issues was being worked on.

He also confirmed that Countywide Traveller Unit would continue on a county-wide basis following post-unitary.

Councillor Hallam presented his report as Cabinet Member for Environment and highlighted the salient points. He noted that his report had been written before the latest lockdown announcement and thanked officers in Environmental Health, Neighbourhood Wardens and Park Rangers for their continued hard work. In response to questions, Councillor Hallam advised that parks were maintained and updated on a rolling basis. Stats on missed bin collections and fly tipping were reported to Cabinet in regular monitoring reports. He confirmed that whilst there had been a number of isolated incidents, business compliance regarding Covid guidelines was generally very high. He advised that the Neighbourhood Wardens were effectively doing 2 jobs currently, however their hard work several months prior contributed to keeping Northampton from entering a local lockdown. Regarding fly tipping, Councillor Hallam stated that the evidence suggested a direct link between criminal gangs and organised fly tipping which was a difficult issue to resolve. He echoed comments made by Councillor Russell congratulating the local Park Ranger and community at Bradlaugh Fields on its Green Flag award.

Councillor Hibbert presented his report as Cabinet Member for Housing and Wellbeing and highlighted the salient points.

At this juncture of the meeting, the Mayor announced that the time limited for Cabinet Member reports had been reached and no further Cabinet Members would elaborate on their reports.

8. OPPOSITION GROUP BUSINESS

Councillor Beardsworth made a statement on “Rose of the Shires” and stated that people going above and beyond during the pandemic represented the rose; she highlighted the efforts of a neighbour in providing meals for school children who had given her the nickname “Mrs Hope”. She lamented the fact that MPs had subsidised meals yet voted not to provide free school meals during school holidays. Councillor Beardsworth hoped that Members would contact the MPs for Northampton North and South and ask why they voted against the motion to provide free school meals.

Councillor Nunn stated that nobody wanted to see children to go hungry and advised that by Thursday 29th October, 11,500 families had received vouchers and that by the end of the half-term, almost every eligible family had access, and noted that they could continue to claim for vouchers after the half term ended. This was an issue that had been exacerbated by Covid-19, but there was a determination to make things better for everyone.

Councillor Beardsworth stated that the Government had not listened to the people; 2,000 paediatric consultants had written to the Prime Minister stressing the importance of free school meals throughout the holidays and the advice had not been heeded.

9. COMMUNITY GOVERNANCE AND NEXT STEPS

Councillor Larratt presented a report on Community Governance and Next Steps and

noted the recommendations of the Cross-Party Working Group, contained in Item 2 of the report.

Councillor Nunn seconded the report.

Councillor Stone moved that the item be deferred and the report be sent back to the Cross-Party Working Group for further development; she stated that there had been no further work had been undertaken since the report was taken to the Cross-Party Working Group on 16th September and expressed her disappointment that the report had not been seen by a scrutiny group or Members informed by way of a briefing.

Councillor Roberts echoed comments made by Councillor Stone and commented that there were no references to funding or budgets within the report

Councillor Birch seconded the motion made by Councillor Stone and commented that work should not progress until further details such as costings were detailed in the report.

Councillor B Markham commented that further details regarding assets, budgets, costing, etc., should be considered by the new town and parish councils which would involve a broader spectrum of elected members and allow members of the public to observe any decisions made.

Councillor Beardsworth expressed her disappointment that no work had been made on the report since it was considered by the Cross-Part Working Group on 16th September. She questioned funding figures in the report and stated that further work was needed.

Councillor Malpas voiced concern around the lack of costings within the report and suggested that some of the town's assets would need to be sold in order for the Guildhall to be properly maintained.

Councillor Larratt commented that any delays could cause the Council to risk losing control of implementing the new town and parish councils; the new shadow town and parish councils were the best option to inform the Cross-Party Working Group which would then bring forward satisfactory recommendations.

A vote was taken on the amendment by Councillor Stone to refer the report back to the Cross-Party Work Group for further work.

Upon a vote, the motion was lost.

The recommendations within the report were agreed.

RESOLVED:

1. That the Chief Executive convenes a first shadow meeting of the Northampton Town Council to consider the matters as set out in the draft agenda on page 17 of the Cross-Party Working Group report of the 16th September 2020 (and

marked Appendix A in that report).

2. That the Northampton Town Council be recommended at its first shadow meeting to agree the terms and conditions along with arrangements for the recruitment of a Town Clerk for the Town Council who when appointed will commence duties as soon as is practicable after the 1st April 2021.
3. That the Cross-Party Working Group be delegated power to carry out the interview and appointment of a Town Clerk and have further delegated authority to agree all terms and conditions for such an appointment.
4. That the services proposed to be transferred to the Town Council as set out in the enclosed report from Richard Walden to the Cross-Party Working Group on page 11, section 3.6 (i) be approved in principle subject to further consideration by the Cross-Party Working Group and final recommendations to be brought back to a future meeting of Full Council.

NB. Please note that the Highway verge issue will remain the responsibility of the new unitary authority unless transferred at some future date.

5. That the Cross-Party Working Group be given delegated authority to act as a Parish Council Remuneration Panel with any recommendations submitted for approval to Full Council and then for consideration by the Shadow Town Council.
6. That Full Council approves the transfer of the existing Borough Coat of Arms to the Northampton Town Council with any necessary approvals from the College of Arms.
7. That the governance arrangements for the Northampton Town Council as set out in section 3.12 on page 14 of the Cross-Party Working Group report be approved and recommended to the Shadow Town Council.
8. That agenda item 4 (pages 31 to 68) of the Cross-Party Working Group report dealing with the transfer to the Northampton Town Council of the Borough Council's muniments etc. be noted with any final decision to be made by Full Council once a full list of such items has been agreed by the Cross-Party Working Group.
9. That the transfer of the following properties as referred to in the Cross-Party Working Group report (agenda item 5 on pages 69 to 72).
 - a) The Guild Hall, Northampton to the Northampton Town Council.
 - b) The Far Cotton Recreation Centre to the Far Cotton and Delapre Community Council.
 - c) The appropriate community centre or centres to be identified in the Kingsthorpe are for transfer to Kingsthorpe Parish Council.

Be approved in principle subject to further consideration by the Cross-Party Working Group as the best way forward both in the short and long term for

each of the above proposals with any final decision being made by Full Council before the 31st March 2021.

10. That the report in Agenda item 6 (pages 73 to 76) of the Cross-Party Working Group dealing with the issue of Town /Parish Council precepts be noted with further reports to Full Council after further consideration by the Cross-Party Working Group.
11. That similarly the report in Agenda item 6 (page 77) of the Cross-Party Working Group dealing with the cost to date of the Community Governance Review be noted.
12. That the decision of the Cross-Party Working Group at its meeting on the 16th January 2020 to give further consideration at a future meeting to the proposal to grant the Freedom of the Borough to the National Health Service etc be noted.

10. NOTICES OF MOTION

Robin Burgess addressed Council in respect of motion i) and commented that on behalf of Northamptonshire County Council he was coordinating the administration of the government award towards addressing holiday hunger. He advised that there were a high number of people seeking assistance who had previously not been in receipt of benefits or required the service of food banks, as a consequence of the pandemic.

Anne Wankiiri, of United African Association addressed Council in respect of motion i) and advised that some BAME children were not eligible for food vouchers due to the immigration status of their parents; her organisation provided many of these families with food parcels but stated that they needed assistance from the Council and other organisations.

Rachel McGrath, representing Northamptonshire Food Poverty Network, addressed Council in respect of motion i) and stated that the Food Poverty Scrutiny Panel found there was an expectation that voluntary organisations would “fill the gap” where councils could not meet the needs of hungry families, however voluntary organisations were facing an unsure future. She stated that the motion would provide assurance to families locked in a struggle to make ends meet, noting that the situation would get worse as unemployment rose. Ms McGrath further noted that the End Child Poverty Coalition found 11,721 kids living in poverty in Northampton.

- l) Councillor accepted an amendment to the original motion as published on the agenda. The altered motion was seconded by Councillor Birch.

“1 in 10 children in Northamptonshire receive free school meals. For many of these children this is the only hot and substantial meal they receive.

Free School meals are not customarily available during school holidays. Working parents incur additional childcare costs around the holidays. Families already struggling with low budgets find it difficult to feed their children. Children most at risk

of hunger during the holidays may also suffer from social isolation, loneliness, and inactivity. These factors combined can lead to significant weight loss or gain, and negative impacts on physical and mental well-being.

This is a problem highlighted further with the current pandemic and one that is likely to increase and definitely not go away. Covid-19 is a natural phenomenon, poverty is not, and the containment of the virus will not end this plight.

During recent months, this council has supported a number of charities and groups to deliver food support to the most vulnerable, many of them supporting families with young children in particular, through grants of around £85,000, and is involved with the management of the £330,000 DEFRA grant which is directly supporting food provision and food banks, which is administered by the Hope Centre.

This council therefore resolved to:

- Work with Northampton MPs and the county council to support the extension of the voucher scheme to all school holiday periods and to look to embed the scheme all year round.
- Urge National Government to act to ensure this gap is filled.
- To support calls to protect pupils forced to self-isolate, who will not receive their free school meal and may go hungry.

This council will also:

- Work with Partners to establish Holiday Clubs where children can access social activities as well as food, providing financial relief for parents on very low incomes, so that no child goes hungry over any school holiday.
- To scope and investigate the possibility of harnessing additional funding targeted to identified groups who already do or wish to offer these services.
- Continue to direct a portion of the community fund budget into community organisations, who already do, or wish to, offer these services.
- In continuing to work with the County Council, commit to taking the points in this motion forward into the West Northants authority.”

Council debated the motion.

Upon a vote, the altered motion was carried.

Alice Whitehead, founder of Save Our Street Trees, addressed Council in respect of motion ii) advised that 10 trees were planted in Far Cotton in 2019 and expressed a wish that this would become a blueprint across the county, but noted that a proactive tree policy was needed that properly maintained, protected and replaced urban trees. She highlighted the benefits of urban trees and stated that trees should be at the heart of the Council's target to reach carbon neutrality by 2030.

Joe Cole, representing Woodland Trust, addressed Council in respect of motion ii)

and echoed comments made by Alice Whitehead and explained that people generally went on to lead more sustainable lives after being involved in environmental causes and reiterated the importance of policies that created social equality regarding trees.

Russell Horsey addressed Council in respect of motion ii) and commented that the importance of urban trees had been highlighted during the pandemic since most people were spending more time locally and at home and stated that this was a good time for the Council to review its tree policy with a view of influencing the new unitary authority to plant more trees across the county. He stated that tree planting was essential in order for the country to meet climate targets and noted that bids awarded by the government were to those councils with strong tree policies and positive community engagement.

II) Councillor Roberts proposed and Councillor Joyce seconded:

“Northampton Borough Council’s Tree Policy was written in 2016, with no serious amendments or considerations since that time. The policy is out of date and falls short of those used by other councils.

There are no pictures to show what a good tree in Northampton looks like, and it fails to join up planning policy.

There is a negative bias that over-emphasises the challenges and conflicts without enough content about the benefits or solutions that would lead to improvement of Northampton’s urban forest and community engagement around them.

There are many more positive benefits that trees bring to urban environments. For example, they can increase house prices, improve health and wellbeing. They can also encourage more sustainable lifestyle choices. There is very little on the biodiversity benefit.

We call on this Council to:

1. Note the significant role trees play in enhancing accessible green spaces, improving air quality, restoring and protecting soil health, creating wildlife habitat, mitigating flood risk and benefiting public health;
2. Recognise the contribution trees make to the environment in our towns including shading and cooling, pollution and noise mitigation, as well speeding up floodwater drainage and improving the quality of our street scene.
3. Call for a review of current policies on, and attitude towards, the planting of trees appropriate to our urban areas with a view to introducing a more proactive policy, which looks to increase the number and regularity of trees planted in our town and residential streets and parks and other open spaces;
4. Call for a new strategy to include providing opportunities to educate children in understanding the benefits of trees and to get involved in tree planting;
5. Recommends closer partnership working with the, and landowners seeking sites for new tree planting
6. Recommends a Tree Summit bringing together the Local Councils, Park

Rangers, Landowners and partners responsible for land maintenance, the Woodland Trust and members of the public to work out how to plant more trees in our town, residential streets and in our parks and other open spaces.

7. Culminate this action into a working Tree Policy that includes but is not exhaustive of the following;

- To allow for 'replacement in situ' of valuable urban trees.
- For a regular maintenance plan to be outlined.
- There should be a mapping exercise. This is not just for existing trees, but for planting opportunities.
- Stronger tree policies that informs infrastructure design and prevents conflicts.
- Arboricultural Officer (s) at the heart of plans
- Parameters agreed on what residents can and can't do to trees.
- A clear inclusion of the responsibilities for Trees on Council owned/NPH run land, taking account of the tree size and maintenance requirements
- More information on tree benefits.
- Detail references that reflect the growing research and evidence into the benefits of trees.
- Recognises an opportunity for the council to adopt CAVAT – a way of valuing its stock when the trees need removing for development, so they can get money back for replanting:
<https://www.ltoa.org.uk/resources/cavat.>”

Council debated the motion.

Upon a vote, the motion was carried.

III) Councillor B Markham accepted an alteration to the original motion as published on the agenda. The altered motion was seconded by Councillor Beardsworth.

“During the 2019 General Election Campaign the Prime Minister identified the need for a fundamental reform of Adult Social Care and that a Green Paper on the future of care would be produced.

No green paper has been forthcoming and so far, there have not been the All Party Talks designed to produce a financially sustainable long-term answer to the Social Care Crisis, in England and Wales.

This council believes the need for government to reform social care remains a priority. The future well-being of our residents poses a serious challenge and potential financial risks to the new West Northamptonshire Unitary and the local health economy.

1. This council therefore supports 'The lives we want to lead' – the LGA green paper for adult social care and asks our local MPs and the Government to engage with the Adult Social Care, All Party Parliamentary Group (APPG) to achieve a non-party sustainable long term answer to the future provision of

Adult Social Care.”

This council also notes the progress of Northamptonshire County Council’s Adult Social Care service to focus on improving outcomes for residents while transforming its services. This has resulted in the service being nationally recognised as a high performing service according to the national ASCOF measures.”

Council debated the motion.

Upon a vote, the motion was carried.

11. MATTERS OF URGENCY WHICH BY REASON OF SPECIAL CIRCUMSTANCES THE MAYOR IS OF THE OPINION SHOULD BE CONSIDERED.

None.

The meeting concluded at 9:21 pm

Cabinet Member Report for Leader of the Council

Northampton Borough Council

18th January 2021



Cllr Jonathan Nunn Leader of the Council

Since my last report to Council I have continued to work with the Cabinet, Members, the Chief Executive and Officers across all areas of the Council, albeit once again virtually, in light of the ongoing Government guidance to work from home wherever possible. Many of these activities and issues are referred to in Cabinet colleagues' reports.

Covid-19

Since my last report to Council in early November, the challenges faced across the town in relation to the Covid19 pandemic have been felt by us all. The number of those with Covid have continued to increase rapidly and whilst we stayed in Tier 2 for a few weeks, we soon moved up into Tier 3 and then over Christmas into Tier 4. We are now in the third national lockdown, which is inevitably putting its own strain on the people of Northampton - both residents and businesses alike. However, the excellent work that the organisation has undertaken, alongside the wider Health and local government system and with wider partners, has meant we are far better prepared to manage this current lockdown. The dedication of staff across the council, whether at the frontline of tackling the pandemic or working hard to keep regular services operating, has been tremendous. That said, with the massive number of covid infection cases including very high hospital occupancy due to covid, it is imperative that we continue to observe all of the guidance in relation to this, and most importantly continue to support one another over the coming weeks as, with the roll out of the vaccine, there seems to be some hope for a way through this terrible virus.

As you can imagine, Covid19 has dominated my own workload, continuing with regular briefings, and attendance at the Oversight and Engagement Board (chaired by Cllr Ian Morris of NCC), where we continue to receive detailed updates from the Director of Public Health on how we as a County, plus the respective Local Authority areas, are faring. I have continued to regularly attend the weekly press conference, to support the efforts to share information publicly, and to support the safety messages to residents and businesses.

I have also joined my fellow Leaders and Chief Executives across all 8 Authorities, together with the key Chief Executives of the Health sector, to brief the 7 MPs on the work that is taking place across the County. This covered not just the activities in our hospitals and the roll out of the vaccination programme, but also the support that we are providing to businesses through the Local Restrictions Support Grant and Additional Restrictions Grant that is currently being distributed.

Similarly, with the focus on how the economy looks to respond to the last 11 months, I have continued involvement in the Northampton Town Centre Task Force meetings, coordinated and led by the Town Centre BID, in order that we can continue to ensure that the town centre has been as safe as possible for visitors, and that local businesses feel supported, can operate safely and, following this current lockdown, can reopen

safely. A key part of the work will continue to promote the town and therefore drive footfall back into our town centre.

Future Northants Activity

There are now less than 90 days to go before West Northamptonshire Council comes into being and therefore the level of activity, and my involvement, has continued to increase in the last 8 weeks, and will continue to do so in the run up to Vesting Day on 1st April. Throughout November and December, I was heavily involved in the preparation for the remaining senior appointments at West Northamptonshire Council (Executive Director for Place, Economy and Environment and Executive Director of Corporate Services) and I am pleased that they were concluded successfully just before Christmas.

I have also continued to lead the Communications Task & Finish Group, which I Chair, and in the last 8 weeks we have had a further 3 meetings, culminating in both a presentation to the Full Shadow Executive in November where the new logo and branding guidelines were presented for West Northamptonshire Council, after extensive consultation with staff, residents and Elected Members alike. In December I also provided a further update to the West Northamptonshire Overview & Scrutiny Committee, in which we were able to bring the Committee up to date on the Day One Readiness campaign starting this month and running until March, alerting both residents and businesses of the changes that will be coming. For many residents, who have less frequent contact with their local council, the move to unitary must simply just be seamless, with for example their bins continuing to be collected as normal. Our need is to provide awareness to those in more regular contact, and likely being more vulnerable, along with reassurance on how their services will continue, and how they can contact their council should they need to.

I have also been part of a number of development sessions arranged for the wider Shadow Executive, including on Leadership Development, Finance and Preparation for the Budgets for 2021/22, as well as briefings on the draft Budget that was recently presented to the Shadow Executive on 5th January.

In terms of the development of the new Parishes and Town Council for Northampton, we have met as the two Community Governance Review Cross Party Working Group, but as the new councils have all now met formally, I am delighted that the new councils themselves are now operating with full authority over their respective issues, budgets and futures, and look set to make a great contribution to the quality of life and wellbeing of their respective residents.

Economic Growth

This has continued at a pace, particularly as we had to submit the Town Investment Plan (part of the wider Towns Fund) by 11th December. A number of Northampton Forward Board meetings therefore took place during November and early December, in order to ensure that the deadline was hit, and a bid for £25m was submitted for 10 projects across the town. We expect to hear back in March 2021.

You will also be aware that we were successful in the Future High Street Fund bid, with £8.4m successfully secured. We hope to have formal confirmation of that, subject to some further feedback that we need to provide, in February 2021. This fantastic news will enable us to progress the redevelopment of the Market Square which we consulted residents and businesses on last year, which will be a real catalyst for positive change in terms of the wider regeneration of the town centre.

Kevin Langley (Acting Director of Economy and Assets) and I also took the opportunity to brief the West Northamptonshire Shadow Executive on the wider regeneration activity that is taking place across the town. That was subsequently followed up by a 'walk-around' the town for some of those Members, which again was extremely beneficial as we move towards Vesting Day, as a lot of this work will be continued through by the new West Northamptonshire Council.

I also Chaired the quarterly meeting of the Waterside Enterprise Zone Board meeting, at which we had positive discussions around the 7 key priority sites that have now been agreed by the Board and we are now looking to develop out, some of which will form part of wider Town Investment Plan (referenced above).

Sub-regional Activities

I continue to represent Northampton in the wider region and sub-region, and in the last 2 months have attended a range of meetings including the ARC Leadership Group, the District Councils Network webinars, particularly focussed on the impact of Covid, and also various meetings of Southeast Midlands Local Enterprise Partnership.

Other Activities

In the last 8 weeks I have also managed to meet virtually a range of key stakeholders, including the President, Kevin Rogers and new Chief Executive, Louise Wall of Northamptonshire Chamber of Commerce. We have consistently maintained a strong positive working relationship with the Chamber, so it was good to meet with them both and where we were able to understand and maintain those positive working relationships as we transition into the new unitary authority. We also provided an update on Local Government Reorganisation to them both.

I have mentioned the importance of our Leisure facilities in previous Leader's reports, and along with NBC officers have continued to stay in touch with, and support, Northampton Leisure Trust. This will continue throughout this current third lockdown.

I have also attended a range of other meetings including the Town Centre Business Improvement District meetings, of which I am a Board member, and was also pleased to attend the Youth Forum Q&A session before Christmas, which is also particularly rewarding in meeting the young people of Northampton.

Working with our partners, particularly around the Homelessness agenda for example, is extremely important to the way that we work. It was therefore positive to meet with Board members of the Hope Centre, alongside the Chief Executive, in which we heard of their proposals of a refreshed business model in light of the way that Covid has impacted on their way of working. My view remains that, as with other important areas of our work, effective and permanent solutions to Homelessness can only be achieved by constructive joined up working with our key partners.

I was particularly pleased to once again be one of the judges in the Male Role Model Awards. As with the Inspirational Women awards for which preparations are again now beginning, this is an important annual event, celebrating the many wonderful people we have in our Northampton community.

Similarly I was once again proud to represent members on behalf of the Borough Council at the (virtual) Remembrance activities in November.

During the past few years, I am proud that the council has achieved progress across a wide range of areas, but this has been during a time of very challenging circumstances,

including covid-19, the move to unitary councils, and the most dramatic change in towns centres for generations, to mention just a few.

My firm belief is that the future success of Northampton relies on strong collaboration with Partners, in the broadest of terms, from businesses and residents, to all public and private organisations, public bodies and Government, and across the political spectrum, and so it is my sincere hope that we see a strong thread of collaboration and unified ambitions for our town, and the wider west Northants area, as a hallmark of our future local government.

Cllr Jonathan Nunn
Leader of the Council

As Deputy Leader of the Council, I have continued to play an active role in the establishment of West Northamptonshire Council as a member of the Shadow Executive with the Highways and Waste Portfolio, and as Chair of two Task & Finish Groups – Civic Matters and Equalities. However, I'm continuing to support the Leader and Cabinet colleagues across a variety of areas within this council. I can report on some of my specific responsibilities as below.

Market

The market continued to gain some momentum despite the downturn in footfall until the second national lockdown was enforced. The trading period up to Christmas Eve was encouraging but, in most cases, not up to the same level as last year. As the new lockdown has been introduced there are only fruit / veg and butchers trading.

We suspended rents to assist the traders at this difficult time and have supported them with a further discretionary grant.

During the second lockdown, a deep clean of the market surface was undertaken as well as replacement of most of the stall covers, in addition eight unused stalls were removed to prevent anti-social behaviour in the area.

Councillor Development / Democratic Services

Meetings are continuing to be held virtually over Zoom and are still working very well; they are continuing to attract public interest, and this is being monitored by the number of views on YouTube.

Member briefings are continuing with them being held remotely and programmed in as required. Two Councillor Briefing sessions were held remotely over Zoom, regarding Safeguarding. A Member attended a virtual event hosted by East Midlands Councils regarding Overview and Scrutiny. Members are booked in to attend externally hosted remote events on homelessness and rough sleeping early in the Spring 2021.

The Mayor has continued to attend events virtually, attending very few socially distanced outside engagements. Civic events with The Mayor have been honoured with socially distanced and on-line ceremonies. This includes ongoing Remembrance Day planning. Work to support The Mayor's charity continues with online fundraising plans. The Mayor's Civic Service which is usually held in the summer has unfortunately been postponed indefinitely now that we are in lockdown again.

Legal Services

The Property Team have completed several transactional matters in recent times. These have included Right to Buy Sales, the sale of garden land, a lease of a hot food takeaway shop and a licence assignment, whilst continuing to support and progress a number of on-going transactional matters.

Electoral Services

The electoral services team have been working on the final stages of the register canvass and published the register on 1st December. Registers have been sent to the required bodies.

The team have been doing some preparatory work on the Northampton Town Centre BID vote and are currently working on the notices that need to go to businesses.

This month the team supported the Romanian embassy by providing polling booths for their elections.

Initial preparations are being made for the Police Fire and Crime Commissioner, Unitary and Parish elections on 6th May 2021, including booking the polling stations and preparing a project plan. The elections teams covering West Northamptonshire have had their first meeting with the new Returning Officer where she outlined her vision for running this year's election.

Street Lighting

The streetlighting project has now been completed under the terms of the contract. The contractor will continue to snag any issues that come in and following our consultant's final inspection. The new lights at St Crispin's are ready for Western Power to connect as this was not in the original contract (decommissioned by others previously). We have managed to cover the cost from within our budget.

The streetlights at Tudor Court, Wootton, have now been connected and again Western Power are attending to turn them on shortly. These lights were fed from the adjacent shop precinct / Co-operative supermarket site. Unfortunately, they were turned off and decommissioned at some point by the landlord. This may have been a billing issue as our estates team cannot find any invoices for power previously for these.

The maintenance contract for our lights is being finalised and will hopefully be in place in the near future.

Rail Issues

England's Economic Heartland have considered responses received to their Draft Transport Strategy. At its meeting of 27th November EEH considered a report setting out a revised introductory section to the Transport Strategy placing more emphasis on decarbonisation of the transport system, prioritisation of investment in strategic public transport schemes and recognising the ongoing critical role that freight and logistics has to play. As such the report proposed that the Transport Strategy should:

- highlight the importance of using East West Rail and mass rapid transit as the catalyst for the transformation of strategic public transport networks.
- ensure that freight and logistics needs continue to be met whilst lowering the environmental impact of their delivery – making the strongest case for investment in the rail network to accommodate the longer distance movements of freight – not just to the benefit of the Heartland but the UK as a whole.

Flooding

The waste management / grounds maintenance team are now addressing the issue of watercourse management. The team has recently assisted with various issues and awaits our contractor's attendance at Green Lane, West Hunsbury, as the water running off Hunsbury Hill Country Park is still causing issues to the rear of local houses.

Recent flooding events will lead to further flood investigations. By the time these are completed any recommendations will be for West Northamptonshire Council to address.

There is a significant flooding issue that has arisen in Collingtree village affecting the rear of properties in High Street and Watering Lane, and on NCC land. We are pursuing the investigation into this issue. WinVic, the contractor working for the developer of the new Rail Freight Terminal, have thoroughly considered if the works that they are undertaking on the other side of the M1 could be causing the problem. They have been very open and transparent and have reassured us that their activities on the site are not contributing to the problem. The possibility of the works currently being undertaken to the M1, especially piling, causing the problem is now being considered.

Governance Review

The shadow Town Council, shadow Kingsthorpe Parish Council and shadow Far Cotton & Delapre Community Council are up and running.

Meetings of the Cross-Party Working Group took place on 2nd and 9th December 2020 and the outcome of these meetings is the subject of separate reports to this Council Meeting.

Councillor Phil Larratt
Deputy Leader of the Council

Government Funding to Support Rough Sleepers' Rehousing

In my last report, I explained that Northampton was the only local authority in Northamptonshire to apply for funding under the Government's Next Steps Accommodation Programme (NSAP) and that it had been awarded NSAP funding of £607,400 to provide rough sleepers with short-term accommodation (emergency housing) and establish a 'Somewhere Safe to Stay' Hub.

I am delighted to report that, since the last meeting, the Government has assessed Northampton's application for NSAP funding for long-term accommodation and awarded the Council £2m of funding to purchase and refurbish 15 one-bedroom flats and 3 five-bedroom HMOs (with ensuite facilities) that will be used to expand Northampton's Rapid Rehousing Pathway for rough sleepers.

In December, we learned that Northampton has been successful in its application for Public Health England funding to set up a dedicated Rough Sleeper Drug and Alcohol Team. The multi-disciplinary team of seven drug and alcohol specialists, supported by peer mentors, will work intensively with people who are sleeping rough, or have a history of sleeping rough, and have a dependency on drugs and/or alcohol or are using them problematically.

£50,000 Civil Penalty for Criminal Landlord

Working closely with Northamptonshire Police and the Gangmasters and Labour Abuse Authority, the Housing Enforcement Team has been very active, executing a large number of warrants during a crackdown on landlords suspected of operating licensable HMOs without a licence.

Northampton's intelligence-led approach to housing enforcement is helping to tackle serious organised crime and criminal, rogue and irresponsible landlords.

Since April 2020, the Housing Enforcement Team has issued civil penalties totalling £262,000. Although some of these civil penalties are subject to appeal, the Council's investigation of housing offences and its enforcement of civil penalties are very robust. .

Last month, the Housing Enforcement Team presented evidence to the First Tier Tribunal in two cases where the landlords had appealed against the civil penalties imposed on them. Although we are currently awaiting the outcome of the second case, we were very pleased that the Tribunal supported the Council's decision to impose civil penalties on the landlord and it ordered the landlord to pay civil penalties totalling £50,000.

Severe Weather Emergency Protocol (SWEP)

SWEP has been activated on three occasions (and for a total of 10 nights) since 24 December.

Although emergency shelter will be provided for one or two nights if the overnight temperature falls to -1°C or below, SWEP will normally be activated when the Met Office is forecasting that the temperature will be 0°C or below for three consecutive nights. When SWEP is activated, emergency shelter will be provided between 9.00pm and 9.00am.

I am pleased to report that everyone staying in the severe weather shelter has respected, and complied with, the special measures introduced to prevent the spread of Coronavirus.

As always, I would like to express my thanks to all of the Volunteers who have supported SWEP.

Homelessness Prevention and Temporary Accommodation

During the eight months ending 30 November 2020, the Housing Advice & Options Team prevented a total of 589 households from becoming homeless by helping them to remain in their existing homes or to secure alternative accommodation.

Although the severe shortage of affordable housing has meant that homeless households are spending a long time in Temporary Accommodation (TA) and the use of TA is still much higher than we would like, Officers from the Council and NPH are continuing to do everything they can to improve the situation. In November 2020, a total of 46 households were helped to move out of TA and into settled housing, including private rented accommodation.

The team is working proactively with the Department for Work and Pensions to identify households that are experiencing difficulties with their housing due to COVID-19. It is working with tenants and home owners to resolve their housing issues and prevent homelessness.

HMO Licensing

Throughout the pandemic, the Housing Enforcement Team has continued to support landlords with the licensing of their HMOs. It maintains the online HMO Licence Register (a list of all licensed HMOs) and, at present, more than 1,000 HMOs have a licence.

Home Adaptations

The Home Adaptations Team has continued to process applications for mandatory disabled facilities grants, and discretionary grants under the Council's Housing Assistance Policy.

Since April 2020, the team has spent, or committed to spend, more than £680,000 of funding to ensure that adaptations can be made to local residents' homes

Northampton Partnership Homes

Looking after its staff and the Council's tenants and leaseholders remains NPH's main priority.

Maintenance, compliance and safety works

Despite the ongoing challenges of COVID-19, NPH continues to undertake repairs and safety works in tenants' homes. Risk assessments are regularly reviewed and updated strictly following government guidelines and protocols to ensure that works can be completed safely.

The large backlog of non-urgent works that built up during the first COVID-19 lockdown is being addressed and, although it could take up to six months to complete them all, the backlog is reducing. All neighbourhood investment works have resumed.

Neighbourhoods and housing services

The pandemic has caused a spike in requests for support and welfare relating to social isolation, especially amongst people who are aged 70 or over. NPH is also seeing an increase in reports of domestic abuse compared with the previous year.

NPH has continued to support elderly and vulnerable people and those families who have been hardest hit. It continues to provide weekly food parcels and, through very generous donations, it provided more than 300 food parcels and hampers for families over Christmas.

Development of new council homes

NPH has completed Phase 2 of the redevelopment of Toms Close, Collingtree. All 21 family homes have been allocated and the new tenants – selected through a local lettings policy – have all moved in. The new tenants included existing council tenants who had been previously been living in overcrowded conditions or were under-occupying their homes, housing applicants on the Housing Register and homeless households living in TA.

NPH has also completed the redevelopment of former garage sites, including Shockley Street and Fulleburn Court, to provide new homes. After a series of delays, the redevelopment of the former Tanners Pub site is now progressing well with Phase 1 recently completed

Despite COVID-19 delays, the 2020/21 investment works in Southfields and Briar Hill are progressing well, and planned works at Goldings are due to start this month. Landscaping and external 2021/22 works have been fully scoped and a programme of surveying the inside of tenants' homes has commenced in line with all necessary COVID-19 precautions.

NPH's Board has approved a new Sustainability Strategy. This is a significant strategy for NPH in terms of how it operates and the nature and extent of capital investment in existing homes and new homes to meet future decarbonisation targets.

Following the second lock-down, NPH re-opened the paint shop operated by its CIC Happy to Help and appointed a handyman to commence a new service in the year, aimed at supporting vulnerable and elderly tenants to carry out minor works in their homes and gardens.

Councillor Stephen Hibbert
Cabinet Member for Housing and Wellbeing

Environmental Services Contract

In the main all services are running well with little or no disruption or complaints though the second lockdown has impacted services due to some Veolia staff (in particular the drivers) being deemed Clinically Extremeley Vulnerable and having to work from home or stay home. This has been challenging although temporary drivers have been used.

A decision was made to focus on reducing food waste rounds if staff shortages occurred due to the lower tonnages produced. Effective communications were carried out to ensure that as well as customers, all stakeholders, such as members, parishes and partners were kept informed of both the situation and the reasons for any reduction in rounds.

The garden waste subscriptions continue to see a slight increase. A Tree Policy workshop is being arranged and is scheduled for the 21st of January 2021.

Projects are progressing to refurbish the Racecourse basketball court and improvements to Towcester Road Chapel.

Environmental Services (Direct Services) **Parks and Open Spaces**

We are just about to submit the last of our Capital projects for 2020/2021, which should all be completed by 31st March 2021.

- Auckland Close – Refurbishment of play area, plus a couple of extra pieces of play equipment.
- Helicopter Park, Ecton Brook - Refurbishment of play area, plus a couple of extra pieces of play equipment, repairs to Wetpour.
- Miller Meadow, St Andrews Road - Refurbishment of play area, plus a couple of extra pieces of play equipment.
- Victoria Park – Remove old gym equipment and replace with new gym equipment and a couple of extra pieces of play equipment.
- Repairs to Ladybridge Park bridge - Wheel chair access issues and safety railings

Currently happening:

- Racecourse - Refurbishment of play area, plus a couple of extra pieces of play equipment
- Delapre Park Lake – New permit fishing signs being installed around the lake – Hopefully will help stop some of the poaching going on.

Recently completed:

- Parklands – Refurbished play equipment and a couple of extra pieces of play equipment
- Delapre Park – Two new height restrictors at the bottom car park
- Lingswood Park – New skate park installed
- Racecourse - Additional bollards near the Pavilion to help stop the fly tipping issues
- Dallington Park Car Park – Resurfacing and parking bays being marked out

Ongoing:

- Dallington Park Cemetery Extension

Neighbourhood Wardens

The Neighbourhood Wardens continue to assist with the Covid restrictions but are also still tackling persistent fly tipping!

In April/May time, the DVLA suspended the removal of untaxed cars because of COVID-19. However, they have now lifted that suspension and the Neighbourhood Wardens are now removing several cars a day in catch-up.

Accomplishments for October/November

- Investigations started – 269
- CPW's issued – 20
- FPN's issued – 14
- Notices (S46 & S108) – 240
- Vehicles visited at – 120
- Vehicles seized – 65

Environmental Health

Ongoing regulation of business compliance with coronavirus regulations – dealing with enquiries and enforcement of lockdown requirements during November.

Supporting the investigation of covid outbreaks in a range of commercial and educational settings. EHO with teaching experience providing specialist support to schools, Licensing committee approved putting updated Statement of Licensing Policy out for consultation.

Working with taxi trade to provide signposting to grant payments and to carry out ensure that they are aware of proposed changes to taxi rank on Mercers Row to accommodate changes in bus operation.

Working with contractors to progress the installation of electric vehicle charging points

Dealing with service requests across all work areas.

New Licensing Support and Finance Officer started working with team on 26th Oct.

Ongoing work with all partners to deal with covid outbreaks continues to improve understanding of roles and responsibilities and promotes joined up working

Christmas Flooding

Northampton Borough Council staff and contractors provided support to those affected by the flooding over the Christmas period. Members of the team carried out visits to people affected by flooding in Collingtree Park and St James, providing signposting to sources of support on insurance and recovery. Neighbourhood Wardens and Veolia staff assisted with the removal of flood damaged furniture from properties and the wider team assisted with the emergency response, facilitating reception centres and arranging emergency accommodation for many people displaced by the flooding at Billing Aquadrome

Councillor Mike Hallam
Cabinet Member for Environment

Councillor Community Fund

Since 1 April 2020, a total of £63,290.20 has been spent by councillors on supporting the delivery of positive outcomes in their wards. Nearly a third of this funding, £20,450.00 has been used directly for COVID-19 support and recovery. This is in addition to the £90,000 COVID specific grant that has already been awarded by councillors to organisations in the Borough.

Northampton Community Resilience Hub

Continue to support those most vulnerable in our communities – 1,222 referrals have been received by our local community resilience hub, individuals and families continue to receive support in getting access to food, with shopping, getting online, picking up prescriptions, support for loneliness, mental health and wellbeing and financial hardship.

Small charities and food banks in Northamptonshire have applied for funds from the “Local Authority Emergency Assistance Grant for Food and Essential Supplies” funded through DEFRA.

The first round of grants has been awarded through the Northampton Hope Centre. Which has been done on behalf of an oversight board made up from representatives of the County Council and Districts and Boroughs on the West to support food banks and local charities and build resilience into these areas.

This grant is for eligible projects that help and support people struggling to afford food and other essentials due to COVID-19 in Northamptonshire, there will be a final tranche of allocations of the funding next month.

A number of focus groups have been carried out with specific groups, including young people, the University, older people and our BAME communities, to gain a better understanding of attitudes and behaviours, in order to direct our communication and engagement activities more effectively.

Forums

1 December – World Aids Day virtual event

3 December – live virtual International Day of People with Disabilities event – Live streamed over You Tube dealing with autism, dementia, PTSD and disability sports.

5 January – community engagement at Thorplands (police priority area) with partners

Ongoing – Planning for virtual International Women’s Day & Inspirational Woman Award

Ongoing – Planning for month long campaign against Violence and Aggression May 2021 with the visit of the Knife Angel to Northampton

Submission of a stage two application has been made to British Cycling/Sport England for a Bike Trail project in the Town.

Events

The council cancelled all outdoor events on council land to support the Governments lockdown restrictions and help reduce the spread of the coronavirus.

The council has continued to deliver some events virtually this included Fireworks on Sunday 1 November; Diwali on Saturday 7 November and Remembrance Day on Sunday 8 November. There was no formal Christmas Light switch-on event this year, however Northampton has switched on Christmas lights across the town centre, Abington Park, Wellingborough Road and St Leonards Road. The council have installed four 40' Christmas trees with 6000 Christmas lights, 200 x 5' small business Christmas trees; lamp post Christmas lights, cross street Christmas lights and Christmas lights in trees along Abington Street, All saints, Market Square and the Guildhall.

This year we erected two large screens in Abington Street showing our virtual events across the year, messages from senior members of our community, Christmas carols, advertisement for town centre businesses, Covid19 safety messages and of course Santa messages as well. The screens operated from the 30 November – 24 December to help make Christmas a little brighter.

2021 looks to be another interesting year with Covid restrictions likely to be around for a many more months but we continue to look at ways of supporting event organisers in delivering safe events for the public to enjoy.

Culture & Heritage

Abington Park Museum remains closed and the decision to reopen will be kept under review against the changing national Covid situation.

The museum service has continued to develop and deliver a range of online events streamed live from Northampton Museum & Art Gallery. In November a third talk led by local historian Mike Ingram entitled Gunpowder, Treason & Plot attracted an audience of 40 adults. Carmela returned to deliver a Christmas pudding & festive desserts workshop which was enjoyed by 19 individuals. December saw Sharn Matthews, a social history expert deliver a talk on Christmas customs and the festive theme continued with a performance of A Christmas Carol by talented local actor, James Hornsby which proved very popular having sold 87 tickets.

Museum Expansion Project

Exhibition installation is almost complete and will be finished at the end of January. The exact opening date is to be confirmed and is subject to the changing Covid 19 situation and the respective tier Northamptonshire is placed in. The museum has undertaken thorough risk assessments and has achieved the 'We're Good To Go' industry standard consumer mark demonstrating we are adhering to Government and public health guidance, have carried out a COVID-19 risk assessment and have the required processes in place to ensure visitor safety.

Customer Services

We have seen a slight increase in calls in October and November (23,550) compared to August and September (23,246). When comparing with the same period of 2019, there has been a slight decrease in calls. This is mainly due to the reduced service being offered within Housing Repairs where during lock down. However, there is a consistent increase in Housing Solution calls when comparing the same period last year where we received 1061 calls in 2019 and 1922 in 2020 (81% increase). These are due to the increase in enquiries relating to people concerned about being asked to leave their current accommodation. Although evictions are on hold the processes are still in place to ensure customers are being given enough advice to reduce the risk of future evictions. The Customer Service Team meet regularly with the Homeless Reduction

and the Housing Options Managers and have recently reviewed the One Stop Shop (OSS) process and made changes to reduce footfall and wait times. The retrieval of brown bin process has been completed and had little impact on the Contact Centre.

Community Safety and Anti-Social Behaviour (ASB)

The overall crime rate is falling, with decreases in most categories, including both residential and business burglary. The notable exception being violent crime, which continues to increase.

Incidents of anti-social behaviour recorded by Northamptonshire Police increased by 27.8% during the year to the end of September. Police have been recording reports of breaches of the COVID regulations as anti-social behaviour offences and it is this which has been the main driver behind the increase in anti-social behaviour reports in the first four months of 2020/21.

A secondary measure for anti-social behaviour is criminal damage: figures for the Partnership decreased by 8.2% compared with 2019/20.

A Closure Notice extension for a further 3 months on a property which has caused high levels of alarm and distress to other residents due to the many incidents of ASB, crime, drug taking, and drug dealing has been secured by our ASB Team and a 4th 'Cuckooing' injunction was obtained on a prolific offender who had been persistently targeting the most vulnerable residents in Northampton.

We have launched an ASB reporting form on our website, for members of the public to directly report to the ASB Team.

Youth work commenced in the basement of McDonalds on the Drapery. Identified and promoted as a 'safe space' for young people, where they can access 1:1 and group work support.

During December - supported the delivery of, OPFCC led, Safer Streets home and vehicle security packs to 1,900 homes in the residential area surrounding the Wellingborough Road.

16 Dec – Community Engagement on Wellingborough Road (Op Sceptre; knife amnesty) with Northants Police

Councillor Anna King

Cabinet Member for Community Engagement & Community Safety

Planning Policy

The planning team have been working on the supporting documents that need to accompany the Northampton Local Plan Part 2 if it is agreed that the Council should submit it to the Secretary of State.

Heritage

The team has continued to deal with all Development Management consultations relating to heritage and trees to time. All applications relating to Tree Preservation Orders and Trees in Conservation Areas have also been dealt with to time.

A new Article 4 Direction for the Barrack Road Conservation Area was confirmed at the 16th December meeting of Cabinet. This applies to all properties and takes away certain permitted development rights.

Work on the local list continues to be progressed.

Planning (Development Management)

- Planning application N/2019/1055 for the proposed construction of 22 no. self-contained apartments with associated storage and external amenity was approved by the Planning Committee on 27th October 2020.
- Planning application N/2019/1063 for the variation of planning conditions in relation to the development for the erection of 40 no. dwellings including car parking and retail space at the former Sofa King Premise, Tivoli House, Towcester Road was approved in principle for the Planning Committee on 27th October 2020, subject to the finalisation of a S106 agreement to secure planning obligations.
- Hybrid planning application N/2016/0810 for the development of up to 170 new dwellings for the conversion and extension of the existing buildings at the University of Northampton Avenue Campus, St Georges Avenue was approved in principle for the Planning Committee on 24th November 2020, subject to the finalisation of a S106 agreement to secure planning obligations.
- Planning application N/2019/0612 for the erection of purpose built student accommodation comprising 347 rooms with 356 bed-spaces including refurbishment and change of use of listed building to provide ancillary student hub was approved in principle for the Planning Committee on 24th November 2020, subject to the finalisation of a S106 agreement to secure planning obligations.
- 100% performance for major, minor and other applications in September to November 2020.

Building Control

- Received 21 Full plan application between October and November 2020.
- Received 93 Building Notices between October and November 2020.
- Received 14 Regularisation applications between October and November 2020.
- Received and actioned 4 Dangerous Structures reports between October and November 2020.
- Received 186 notifications for the commencement of work between October and November 2020
- Issued 152 completion certificates between October and November 2020
- Carried out 864 inspections (including some virtual inspections) between October and November 2020.
- 100% of inspections booked on the same day have been carried out (including some virtual inspections) between October and November 2020.

Land Charges

We have a standard KPI which we are not required to report on to return local search within 10 working days, which we have met returning searches in 4-6 working days. We make daily updates to the LLPG (local land and property gazetteer) which feeds into all property data bases within NBC and externally to Police, Fire service etc. this is reported on monthly by a central hub. We currently have a rating of Bronze which shows we have made a number of property updates following the addition of new criteria in April 2020.

The ratings are as below

BNS – Below national standard

ANS – Achieving national standard

Bronze

Silver

Gold

Councillor James Hill
Cabinet Member for Planning

Economy And Assets

Economic Growth and Regeneration

- Towns Fund: Submission of the Northampton Town Investment Plan was made on 11th Dec. The Town Investment Plan sets out an ambitious plan which would deliver:
 - 15,600 square metres of new and refurbished commercial floorspace (including shared workspace)
 - 24,900 square metres of new public spaces
 - 2,300 square metres of new or expanded cultural and heritage venues, including new space for skills facilities
 - Remediation and enabling works for key sites in the town centre to create new public spaces, new mixed-use urban quarters, and commercial facilities.
- Northampton has been awarded £1m in advanced funding to remediate the former Marks and Spencer's building on Abington Street in order to prepare the site for redevelopment. A contractor has been appointed to undertake asbestos removal and soft strip out which will commence in January
- Grants to businesses as a result of the latest government lockdowns that have been imposed from November have started to be paid out to businesses with over £1m already distributed to local businesses.
- Northampton Museum and Art Gallery – Snagging work are now complete with the opening of the building to take place imminently.
- Vulcan Works Cultural Hub – Work is still progressing well on site with the main buildings now really taking shape which is changing the feel of that area of the town. Work has progressed well despite Covid with many of the facades now viable and the St Johns Building nearing completion.
- Government announced on Boxing Day that Northampton was successful in its bid into the Future High Street Fund, being allocated £8,44m. Northampton was one of just 73 towns selected from over 300 that put Expression of Interest for the fund and will be a great start to the next phase of investment in our town. This money will be used to transform the Market Square, making the area reflect the ambitions of the town. In the coming weeks we will be making further information available about how the money is to be spent.

Property Maintenance

- Service is running fully with officers working remotely responsive repairs, statutory compliance both being dealt with alongside capital project works
- Streetlight project finished with only snagging left to complete.
- Royal Theatre roof repairs contractor selected and works scheduled to be completed before April 2021.
- The specification for the replacement plant at Mounts, Danes Camp and Lings is complete with the procurement of these works to commence in January to appoint a contractor early in the new year.
- Billing Road cemetery gates contractor appointed and works to start end February 2021
- Billing Lakes phase 2 project complete handover to NBC from contractors early January 2021

Corporate Assets

- Recommendations for disposals approved at December Cabinet which included: -
 - Albion House to be sold at market value to facilitate the creation a major centre for leather to be established, which will incorporate the Leather Museum, the Leather Conservation Centre and crafting workshops.
 - A plot of land for a new electricity supply for the Vulcan works project will be sold to the electricity
 - Northampton Sub Aqua Club to be sold to the leaseholder who intends to invest in the site.
- The community asset transfers approved by Cabinet in May for transfer to Billing, Duston, East Hunsbury, Upton and Wootton Parish Councils are progressing through solicitors.
- The sale of land at Blackthorn has completed and the Abington Park Café lease has completed.
- Assets are supporting tenants who are struggling to pay their rent by reviewing accounts, contacting tenants and working with them to find solutions to resolving arrears which have accrued due to the impact Covid 19 has had on their business. There will be an unavoidable increase in the rent arrears as a result of the pandemic.

Town Centre

- The council continues to work closely with the BID and town centre businesses providing advice and support to businesses forced to close as a result of the Covid pandemic.

Footnote

This is likely to be my last report to Northampton Borough Council . after thirty years' continuous membership of the Council. I thank all colleagues, both members and staff, for their support, good humour and tolerance over the years, and wish you and the new Council well for the future.

Cllr Tim Hadland**Cabinet Member for Regeneration and Enterprise**

Finance

Our Auditors continue to work on the 2018-19 Accounts, with the aim of formal sign off by March 2021 Audit Committee. The draft Statement of Accounts for 2019-20 has been published and the audit will now cross into the new authority. Action is being taken to ensure continuity of service as part of the Unitary Finance Workstream, as this will be required to support the closedown and SoA for 2020-21.

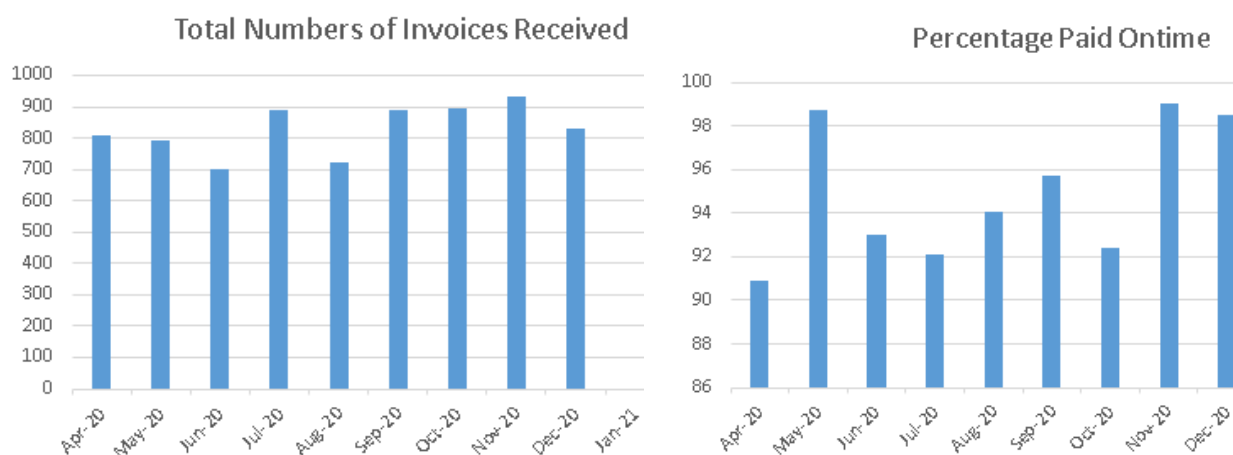
The new shadow authority published its draft budget on 23rd December 2020. Our finance teams are now active in support of the new authority budget and financial planning, in addition to continued support for the Borough in respect of in year management and business cases.

Cabinet received its last report on the current year budget in December which reflected a small underspend, after considering service pressures arising from Covid and the grants that have been provided to support us.

A final Budget Monitoring Report will be provided to Cabinet in February 2021.

NBC currently has £3.096M aged debt, a reduction of £540K from my last report to Council. NBC in accordance with Government Guidance, did not seek to actively pursue debt during the initial three months of the pandemic. Soft reminders have now commenced, with a view to formal actions if required, when the courts open proper. A considered approach is being taken in respect of all debt and the ability to pay.

Although the Accounts Payable/Receivable Team have suffered from reduced resources as a result of the pandemic, along with major involvement with the creation of the new West Northants Council, they continue to operate a good service and seek to pay invoices on time, despite the complexities of remote working and new processes. I am pleased to report that we are returning to a more acceptable level of invoices paid on time, in this new normal environment.



Revenues & Benefits

This service area is perhaps one of the most affected within my portfolio in respect of working to support the Covid19 solutions.

Council Tax collection remains volatile, at present the core collection rate has not dropped materially. However, our forecasts suggest that once the furlough schemes come to an end, the phased reduction commencing now, we can anticipate an increase in benefit claims and a reduction in Council Tax payments received. In addition, we are seeing an increase in Council Tax Reduction Scheme requests.

BEIS Business Grants Schemes from the initial Lockdown have now closed. Final applications have been processed and a reconciliation process has been completed with BEIS, confirming we have accounted for the £36,306,500.00 correctly, that we distributed.

Having successfully implemented new systems to deliver these Business Grants, the Government instructed Local Authorities to administer the Track and Trace payment system.

We continue to administer a range of BEIS Business Support Grants from November and will be making arrangements to activate the Portal to process the new grants announced relating to the current six week lockdown, at the time of writing I am aware our officers are scouring Government sites for guidance and awaiting a funding allocation.

There are now 7 schemes live and active with more due to go live as a result of the new lockdown. Since the start of November we have distributed over 700 grants to businesses worth £1.2M. We continue to ask local businesses to check our website and apply for grants they are entitled to through our portal system.

This will be a payment of £500 for those that have been instructed to self-isolate for two weeks by the NHS Trac & Trace service. There are two schemes, the first is driven by entitlement to specific existing benefits/criteria. The second is referred to as discretionary but is based on a second set of criteria for those that are on low incomes and cannot work from home and will suffer a loss of income. This will be administered by our Revenue & Benefit Service. The numbers of likely claimants is not anticipated to be high, but it is a further pressure on this service and resources.

At the time of writing we had paid 110 claims (£55,000) that met the NHS/Government criteria.

Wider CFO Team

The wider teams continue to actively support the wider front-line services in respect of HR matters, Wellbeing, Health & Safety, ICT, Governance, Risk Management, Audit and general financial support. They are also in the process of launching a revised DSE process with an aim of making our staff more resilient whilst working from home or office. Some of these assessments and measures will also be rolled out to Councillors.

All CFO teams are actively seeking to support Future Northants, whilst maintaining 'Business As Usual' (BAU) and Covid related challenges.

There will be a particular emphasis in this final quarter of 2020-21 on the Governance aspects of 'closing down' the Council in respect of records (paper and electronic), novation of contracts, migration to new accounting and HR systems and closedown of the 2020-21 Financial Year.

Facilities Management

The Facilities Team like many businesses, have suffered income loss for bookings etc. With the lockdown easing, there is a revival of enquiries and with some future bookings being taken.

The Guildhall Team continue to receive enquiries and some bookings in respect of weddings, the reduction from '30' to '15' attendees is deterring some from booking, along with the risk of local lockdown action (a national concern for such events).

The Guildhall Team have also been working with contractors appointed by Asset Management to safely remove asbestos from the basement/boiler areas as part of the boiler renewals.

The teams continue to work hard to support all services with deep cleaning, installed new security doors in the Guildhall, protective screens in the One Stop Shop, maintaining the full post room service, where scanning documents for electronic use is even more critical than normal.

The Guildhall Team are also supporting the wider CFO Governance Group in supporting all services to cleanse basement archives in addition to clear desks and reducing paper stored in cabinets.

Some of the recent achievements include:

- The refresh of the Court Room commenced with the stonework being cleaned and repairs to the bar, including new flooring and a lick of varnish.
- Guildhall roof works went out to tender
- Blue Plaques Panel whittled nominees down to 8 for further research into their contributions to Northampton and to check no skeletons that could come out later.
- 5th deep clean of Guildhall complete and all Porter/Cleaner targets achieved
- A total of 48,407 items of post dispatched
- 1,093 incoming documents scanned onto EDRMS, 993 incoming Revs and Bens documents indexed along with 3,611 incoming Revs and Bens e-mails indexed
- 1,198 planning letters e-mailed in by home workers – printed, enveloped and dispatched
- 603 items of mail usually distributed to departments by Post Room trolley, scanned and e-mailed to departments
- 2 wedding bookings secured for 2021 and an enquiry for a large event in 2022.

Councillor Brandon Eldred
Cabinet Member for Finance

Appendices: 3



Agenda Status: Public

Directorate: Planning and Sustainability

Report Title	Northampton Local Plan Part 2: Submission Version
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1. Purpose

- 1.1 To seek agreement to submit the Northampton Local Plan Part 2 to the Secretary of State for independent examination.

2. Recommendations

- 2.1 That Council approves the submission of the Northampton Local Plan Part 2 to the Secretary of State for independent examination by a Planning Inspector under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended. A copy of the Plan is attached as Appendix 1.
- 2.2 That the Officer responses to the representations made on the Proposed Submission Local Plan Round 2 be agreed (Appendix 2).
- 2.3 That the Proposed Schedule of Minor Modifications be agreed (Appendix 3).
- 2.4 That the Director of Planning and Sustainability may approve any necessary supporting documentation to the Plan required for submission.

3. Issues and Choices

3.1 Report Background

- 3.1.1 On 16th December 2020, Cabinet agreed that the submission version of the Northampton Local Plan Part 2 be recommended for approval by full Council to submit to the Secretary of State for independent examination by a Planning Inspector.

Policy context

- 3.1.2 The Northampton Local Plan Part 2 (the Plan) seeks to deliver the West Northamptonshire Joint Core Strategy including the delivery of 18,870 net additional dwellings from 2011 to 2029 and a significant contribution to the creation of 28,500 jobs. The Plan therefore includes site specific allocations which show where these houses and jobs can be delivered. The Plan also includes development management policies which will be used to determine planning applications.

Plan preparation process

- 3.1.3 The Council went through a series of consultation exercises to reach this stage, which began in May 2016. The stages were: Issues (May 2016), Options (September 2016), Sites (September 2017), Proposed Submission Round 1 (May 2019) and Proposed Submission Round 2 (July 2020).
- 3.1.4 The second round of public consultation on the Proposed Submission version concluded in September 2020. This consultation stage was in conformity with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended. Representations were sought on the grounds of legal compliance and soundness and in accordance with the requirements set out in the National Planning Policy Framework. If, as a result of the responses received to Regulation 19 consultation, only minor modifications are required to the Local Plan, the local planning authority can submit it to the Secretary of State for Housing, Communities and Local Government for independent examination.
- 3.1.5 The content of the Local Plan has been informed by an extensive evidence base which has been kept up to date and reviewed in the light of representations to previous consultations. The Plan, which is accompanied by a Policies Map, is also supported by a Sustainability Appraisal which appraises the social, economic and environmental effects of the plan and to consider choices made in comparison to reasonable alternatives. These documents can be found here: <https://www.northampton.gov.uk/lpp2proposedsubmissionround2> .
- 3.1.6 The Council has worked with neighbouring councils and the County Council during the preparation of this plan in accordance with the Duty to Cooperate.

Northampton Local Plan Part 2 (Proposed Submission Round 2) consultation

- 3.1.7 The Proposed Submission Local Plan Part 2, published in July 2020, contains 44 policies, 6 of which are site specific. The Council received responses from 65 respondents, generating over 800 separate comments.
- 3.1.8 48 respondents stated that the Plan was legally compliant, 6 said it was not and 11 did not specify. 19 respondents said the Plan was sound, 39 said it was not and 7 did not specify.

- 3.1.9 The comments received focused mainly on specific policies and issues. Historic England and Natural England were recommending further changes to the wordings of the relevant policies, but not changing their contents or direction. Objections were received from the housebuilding industry and planning consultants who were concerned about the housing policies including the requirements for self-built and custom-built housing. Objections were received from residents to some of the housing allocations including Great Houghton and Abington Mill Farm.
- 3.1.10 There were expressions of support for some of the policies on the basis that they reflected the outcome of the first round of consultation. Support was received from Historic England as well as matters relating to public health.

Independent Examination

- 3.1.11 Once submitted to the Secretary of State, a Planning Inspector will be allocated to conduct an independent examination on the Plan. If the Plan is submitted by mid-February at the latest, it is anticipated that an examination in public will take place in early summer.

Adoption

- 3.1.12 Once an examination is concluded, there is a likelihood that the Planning Inspector will recommend some major and minor modifications to the Plan. These will need to be released for consultation prior to adoption.
- 3.1.13 It is anticipated that the Plan could be adopted in the autumn of 2021.

3.1 Decision details

- 3.2.1 If Council agrees to the Northampton Local Plan Part 2 being submitted, the Plan and its supporting documents will be submitted to the Secretary of State for independent examination by a Planning Inspector. At this point, the Plan will start to carry greater weight, which means that any decisions for development management purposes made using these policies will be afforded weight on the grounds that it will have been submitted.
- 3.2.2 If Council does not agree to the Northampton Local Plan being submitted, then the Plan will continue to have limited impacts on the development management decisions that need to be made and the outcome of development proposals in Northampton.

4. Implications (including financial implications)

4.1 Policy

- 4.1.1 The Northampton Local Plan Part 2 will replace the 1997 Local Plan Saved Policies and the 2013 Central Area Action Plan. An up-to-date Local Plan will provide greater certainty and allow policies at the local level to address local issues and be fully compliant with up-to-date requirements and the requirements of the adopted West Northamptonshire Joint Core Strategy. Planning applications will be determined in accordance with the development

plan, including this Local Plan, unless material considerations indicate otherwise. It is important to note that both Daventry District and South Northamptonshire Councils have recently adopted their respective Local Plan Part 2.

4.2 Resources and Risk

- 4.2.1 Sufficient financial resources are available for the process of submission to take place as scheduled in the budget for 202/21 and 2021/22. Every effort will continue to be made to ensure that the submission to the Secretary of State and the independent examination are not adversely affected by any redeployment of Planning Policy officers as a result of efforts to tackle the Covid 19 outbreak.

4.3 Legal

- 4.3.1 The Local Plan is a statutory document and was prepared in accordance with the Planning and Compulsory Purchase Act 2004, as amended and the Town and Country Planning Act (Local Planning)(England) Regulation 2012 (as amended); The Environmental Assessment of Plans and Programmes Regulations 2004; and the Conservation of Habitats and Species Regulations 2010.

4.4 Equality

- 4.4.1 An Equalities Impact Assessment has been carried out and it is concluded that none of the policies in the Plan needed to go beyond the screening stage as no unjustifiable negative impacts were identified.

4.5 Environmental Implications (including climate change issues)

- 4.5.1 On 3rd June 2019, the Council declared a climate change emergency, and the objective to make Northampton carbon neutral by 2030. The local plan contains policies that help to address climate change and will help to improve the sustainability of new development.

4.6 Other Implications

- 4.6.1 There are no other implications arising directly from the proposals in this report.

5. Background Papers

- 5.1 National Planning Policy Framework, 2019

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

- 5.2 West Northamptonshire Joint Core Strategy, 2014

<https://westnorthantsjpu.inconsult.uk/connect.ti/website/view?objectId=2737424>

5.3 Central Area Action Plan, 2013

https://www.northampton.gov.uk/info/200205/planning_for_the_future/1748/central_area_action_plan_caap

5.4 Northampton Local Plan, 1997

https://www.northampton.gov.uk/info/200205/planning_for_the_future/1746/

5.5 Northampton Statement of Community Involvement, 2018

https://www.northampton.gov.uk/info/200205/planning_for_the_future/1746/

Appendix 1 - Northampton Local Plan Part 2 Submission, December 2020

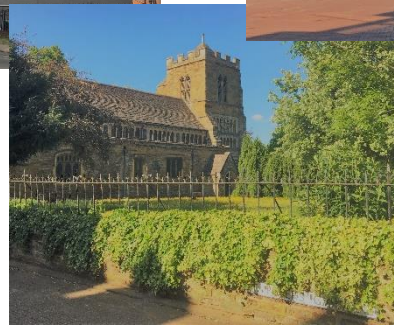
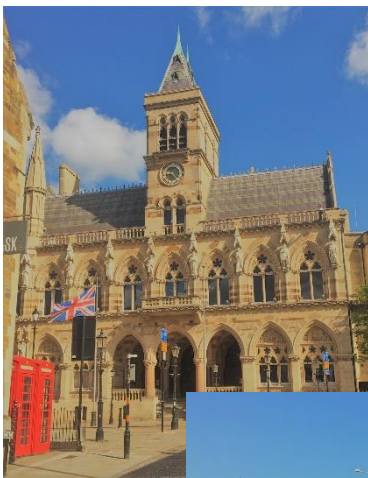
Appendix 2 – Summary of Representations and Officer Responses, November 2020

Appendix 3 – Proposed Schedule of Minor Modifications, November 2020

Peter Baguley
Assistant Chief Executive (interim) and Director of Planning and Sustainability
01604 838921



NORTHAMPTON
BOROUGH COUNCIL



Northampton Local Plan Part 2
2011 – 2029
Submission Version
December 2020

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		
Chapter	Section	Page
1	Introduction and Policy Context	7
2	Northampton Now	12
3	Vision and Borough Objectives	32
4	Sustainable Development	36
5	Quality of New Development	37
6	Northampton Regeneration Strategy	49
7	Residential	57
8	Economy	72
9	Hierarchy of Centres, Retail and Community Services	78
10	Built and Natural Environmental Assets	92
11	Movement	103
12	Infrastructure	110
13	Site Specific Allocations and Policies	114
14	Implementation and Monitoring Framework	133
Glossary		161
Appendix		
A	Trajectory for sites allocated in the Local Plan Part 2 (excluding Sustainable Urban Extensions and housing commitments in the Five Year Housing Land Supply)	175
B	Superseded Policies	181
C	Schedule of planning obligation requirements for Northampton Transport Schemes	188
D	Northampton and NRDA Transport and Infrastructure Schemes	190
E	A45 Northampton Growth Management Scheme projects	192
F	Healthcare infrastructure projects schedule	193
G	Primary education provision requirements	194
H	Secondary education provision requirements	195
LIST OF POLICIES		
1	Presumption in favour of sustainable development	36
2	Placemaking	38
3	Design	39
4	Amenity and Layout	40
5	Carbon reduction, community energy networks, sustainable design and construction, and water use	43
6	Health and wellbeing	46
7	Flood risk and water management	47
8	Supporting Northampton Town Centre's role	52
9	Regeneration Opportunities in the Central Area	53
10	Supporting and safeguarding the University of Northampton Waterside Campus	54
11	Managing hotel growth	55
12	Development of main town centre uses	56

13	Residential and other residential led allocations	62
14	Type and mix of housing	67
15	Delivering Houses in Multiple Occupation	70
16	Gypsies, travellers and travelling showpeople	70
17	Safeguarding Existing Employment Sites	75
18	Supporting New Employment Developments and Schemes Within and Outside Safeguarded Sites	77
19	New Retail Developments and Retail Impact Assessment	80
20	Hot food takeaways	82
21	Residential Development on Upper Floors	83
22	Neighbourhood Centres	84
23	Sports facilities and playing pitches	86
24	Community facilities	88
25	Childcare Provision	90
26	Sites for Burial Space	91
27	Sustaining and enhancing existing, and supporting the creation of, Northampton's Green Infrastructure	93
28	Providing Open Spaces	95
29	Supporting and enhancing Biodiversity	98
30	Upper Nene Valley Gravel Pits Special Protection Area	100
31	Protection and enhancements of designated and non-designated heritage assets	102
32	Designing Sustainable Transport and Travel	105
33	Highway network and safety	106
34	Transport schemes and mitigation	108
35	Parking standards	109
36	Electronic communication networks	111
37	Infrastructure Delivery and Contributions	112
38	Development Allocations	115
39	Northampton Railway Station (LAA0288), railfreight and adjoining sites (LAA0333)	118
40	Martin's Yard extension (LAA1005)	121
41	The Green, Great Houghton (LAA1098)	123
42	Greyfriars (LAA1113)	126
43	Ransome Road (LAA1139)	128
44	Sites in Tanner Street, Green Street, St Peter's Way and Freeschool Street (LAA0167/ 0818/ 0931/ 1010)	131
LIST OF FIGURES		
1	Northampton Borough Boundary	7
2	Key stages of the Northampton Local Plan	9
3	Northampton Communications	12
4	Northampton Central Area	14
5	County visitors	17
6	County expenditure on tourism	18
7	Heritage and Historic Landscapes in Northampton	21
8	Locations of Air Quality Management Areas	24

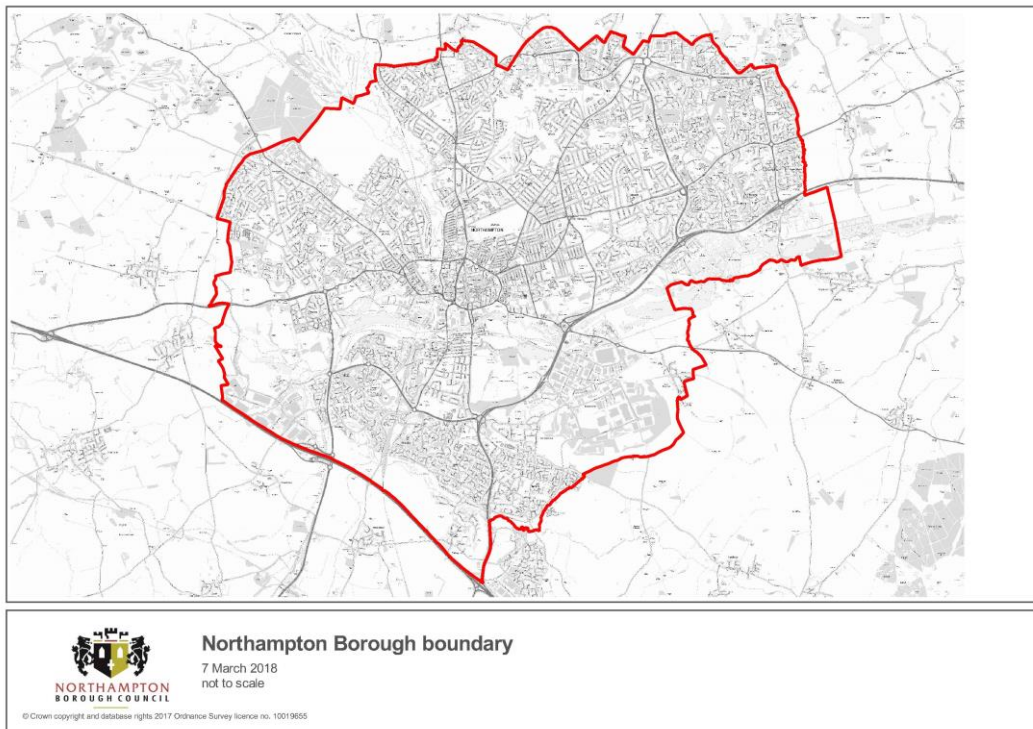
9	Sustainable Urban Extensions within the Northampton Related Development Area	30
10	The Central Area and the Town Centre boundaries	50
11	Northampton Waterside Enterprise Zone	73
12	Existing neighbourhood centres	84
13	Village and community hall locations in Northampton and its adjacent area	87
14	Meeting community needs	88
15	Open spaces classification for Northampton	94
16	Open spaces in Northampton (all typologies)	97
17	Locations of Air Quality Management Areas	105
18	Development principles for Northampton Railway Station and railfreight sites	120
19	Development principles for land north of Martin's Yard	122
20	Development principles for land at The Green, Great Houghton	125
21	Development principles for Greyfriars	127
22	Development principles for Ransome Road	130
23	Development principles for Tanner Street, Green Street, St Peter's Way and Freeschool Street	132
LIST OF GRAPHS		
1	Housing delivery in Northampton against the Joint Core Strategy housing delivery trajectory	58
2	Northampton Local Plan Part 2 housing delivery trajectory	62
LIST OF TABLES		
1	Housing completions and delivery in Northampton (2011-2019)	15
2	Northampton Hotel Supply (May 2016)	19
3	Northampton Hotel Performance 2013 – 2015	19
4	Northampton projected requirements for new hotel development 2016-2029	20
5	Public Health England's population profile for Northampton July 2018	25
6	Housing commitments (including Joint Core Strategy allocation) proposed allocations and windfall	59
7	Local Plan Part 2 Housing Delivery Trajectory	61
8	Housing mix of objectively assessed need for market and affordable housing, 2016 to 2029	66
9	Specialist Housing Requirements	67
10	Net job changes in West Northamptonshire	76
11	Retail floorspace capacity	79
12	Local Plan Implementation and Monitoring Framework	136

CHAPTER 1 INTRODUCTION AND POLICY CONTEXT

a. PLANNING POLICY CONTEXT

1.1 Northampton Borough Council is preparing a new Northampton Local Plan Part 2, which will cover the 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 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.

b. PLAN PREPARATION PROCESS

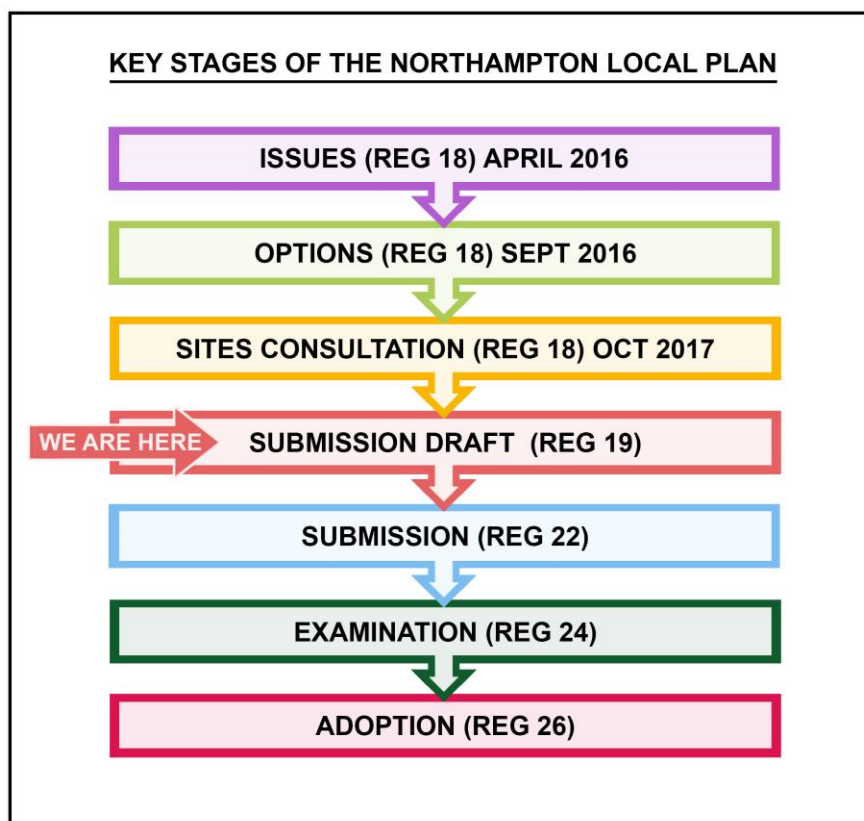
1.6 The National Planning Policy Framework (February 2019) sets out the requirements for the preparation of the local plan. Plans must be prepared in accordance with legal and procedural requirements and be sound. Plans are sound if they are:

- 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 consultation on the Submission Draft Round 2, the Council will update the Local Plan to take into account the comments received. The Plan will then be submitted to the Planning Inspectorate for an independent examination.

c. 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 Council worked closely with partners in Daventry District, Northamptonshire County and South Northamptonshire Councils in preparing the West Northamptonshire Joint Core Strategy Local Plan Part 1. The Council has continued to work closely and engage with Daventry and South Northamptonshire, as well as other authorities including Wellingborough 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.

d. SUSTAINABILITY APPRAISAL AND HABITATS REGULATIONS ASSESSMENT

1.14 In line with legislative requirements, each successive stage in the production of LPP2 has been the subject of a sustainability appraisal. 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 accompanies this local plan round 2 consultation.

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 (Directive 92/43/EEC) to assess the impacts of the Local Plan proposals against the conservation objectives of the SPA.

e. 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

1.19 Further information can be found in the Consultation Statement which accompanies this Proposed Submission round 2.

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.

b. 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.

c. Geology

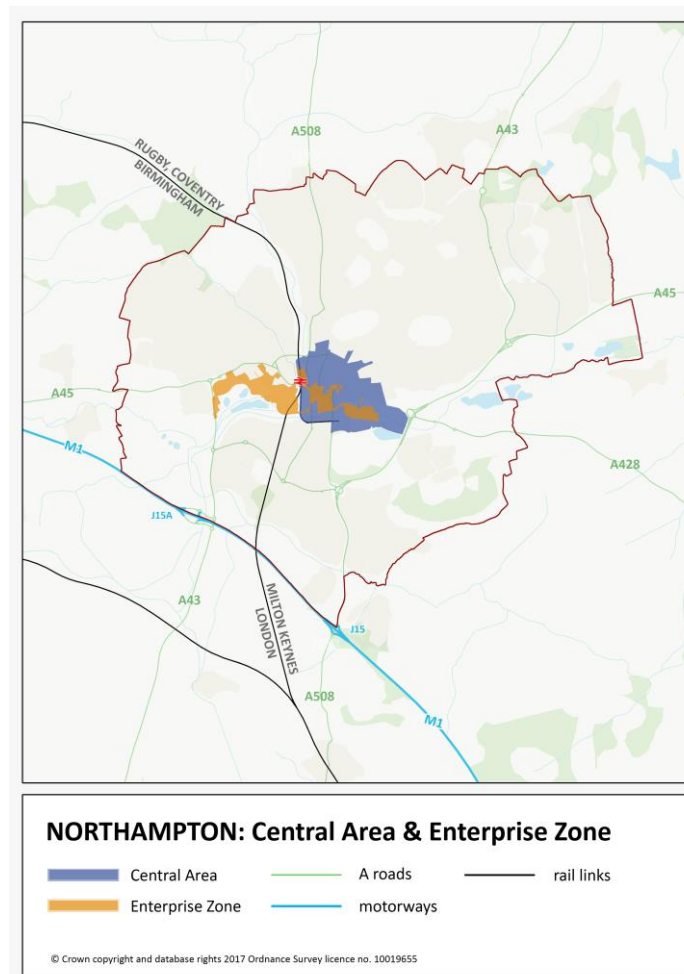
2.6 Northampton is located on the edge of the band of Oolitic limestone, which runs north-south through England. It lies at the junction of several types of limestone and the adjacent clay, which creates a complex geology for the area. The most well known of the Oolitic limestones are the "Northampton 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.

d. 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).

e. 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 – 2019)

	JCS Requirement 2011 – 2019	Actual Housing Completions (Net Additions)	Delivery of Dwellings compared to the requirement
Total dwellings	8,157	5,727	-2,430

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.

² Land Registry House Price Index

[https://landregistry.data.gov.uk/app/ukhpi/compare?in=avg&location\[\]=E07000154&location\[\]=E12000004&location\[\]=K02000001&st=all](https://landregistry.data.gov.uk/app/ukhpi/compare?in=avg&location[]=E07000154&location[]=E12000004&location[]=K02000001&st=all)

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

f. 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 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.

2.15 The borough's importance as a centre for employment is reflected in the fact that overall there is net inflow of about 12,000 commuters to the 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.

³ <https://www.nomisweb.co.uk/reports/lmp/la/1946157159/report.aspx>

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)

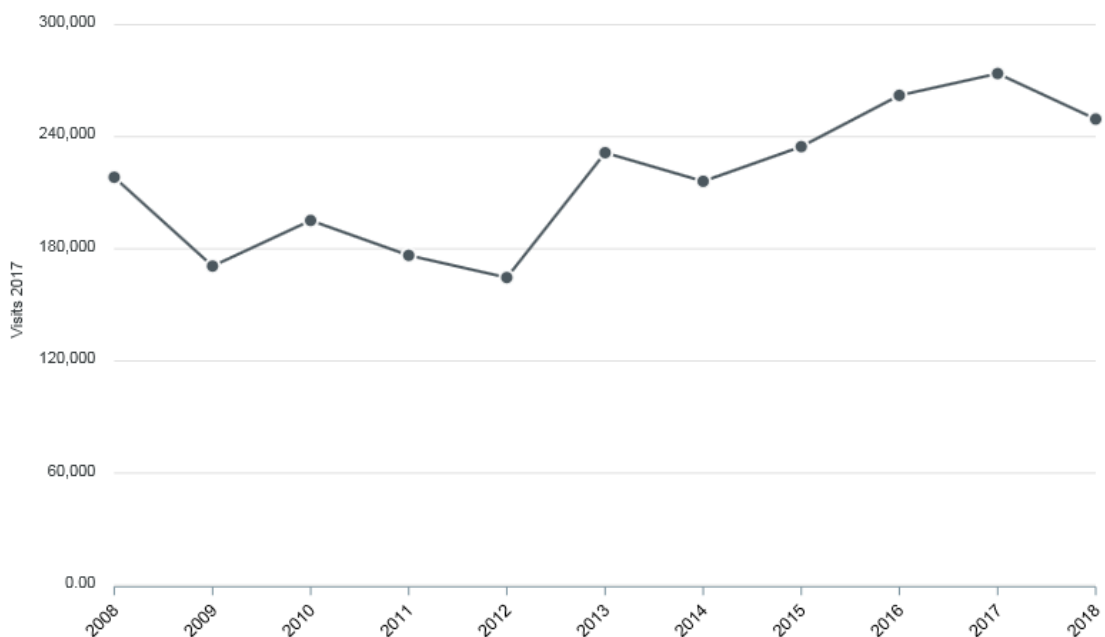
2.17 Over the last 25 years, the town centre has not seen the level of retail investment that would be expected for a centre of its size. Although there has been some small-scale retail investment, this has not addressed the needs of modern town centre retailers.⁶

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

g. 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%.

Figure 5: County visitors



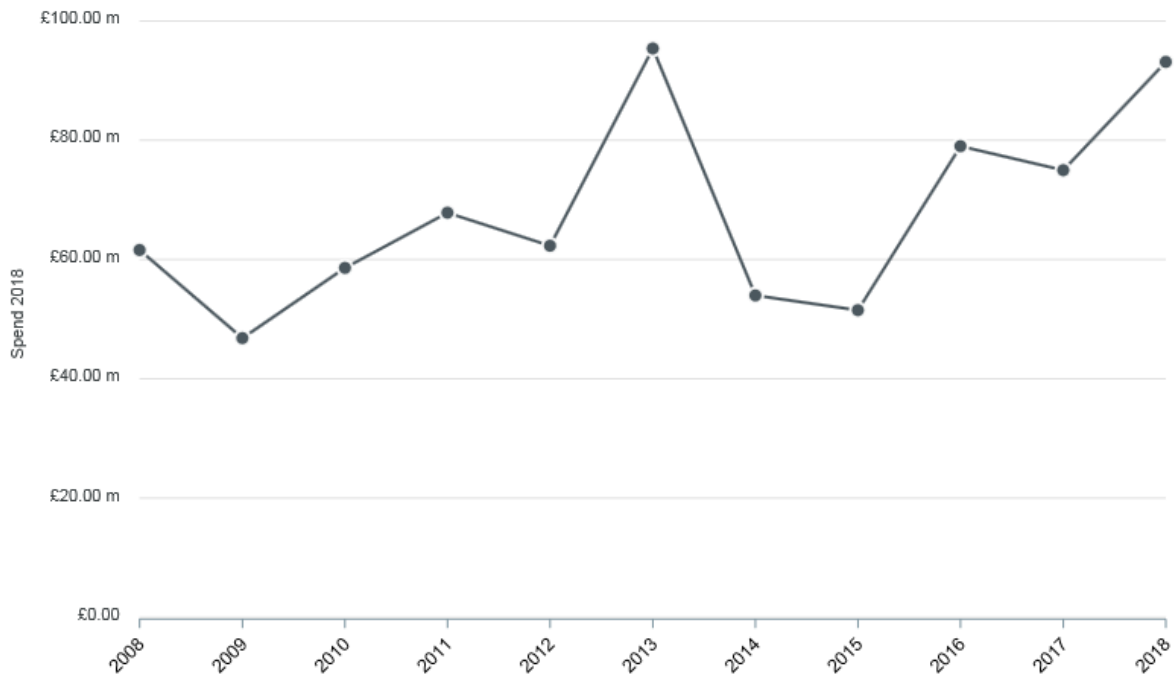
⁶ Northampton Town Centre Masterplan Cabinet Report, October 2019

⁷ Northampton Town Centre Masterplan Cabinet Report, October 2019

⁸ <https://www.visitbritain.org/nation-region-county-data?area=1570>

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.

⁹ Northampton Hotel Futures: hotel audit and demand assessment (Hotel Solutions, May 2016)

Table 2**NORTHAMPTON HOTEL SUPPLY – MAY 2016**

Category/ Standard of Hotel	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.

Table 3**NORTHAMPTON HOTEL PERFORMANCE 2013-2015**

Standard of Hotel	Average Annual Room Occupancy %			Average Annual Achieved Room Rate ⁶ £			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
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

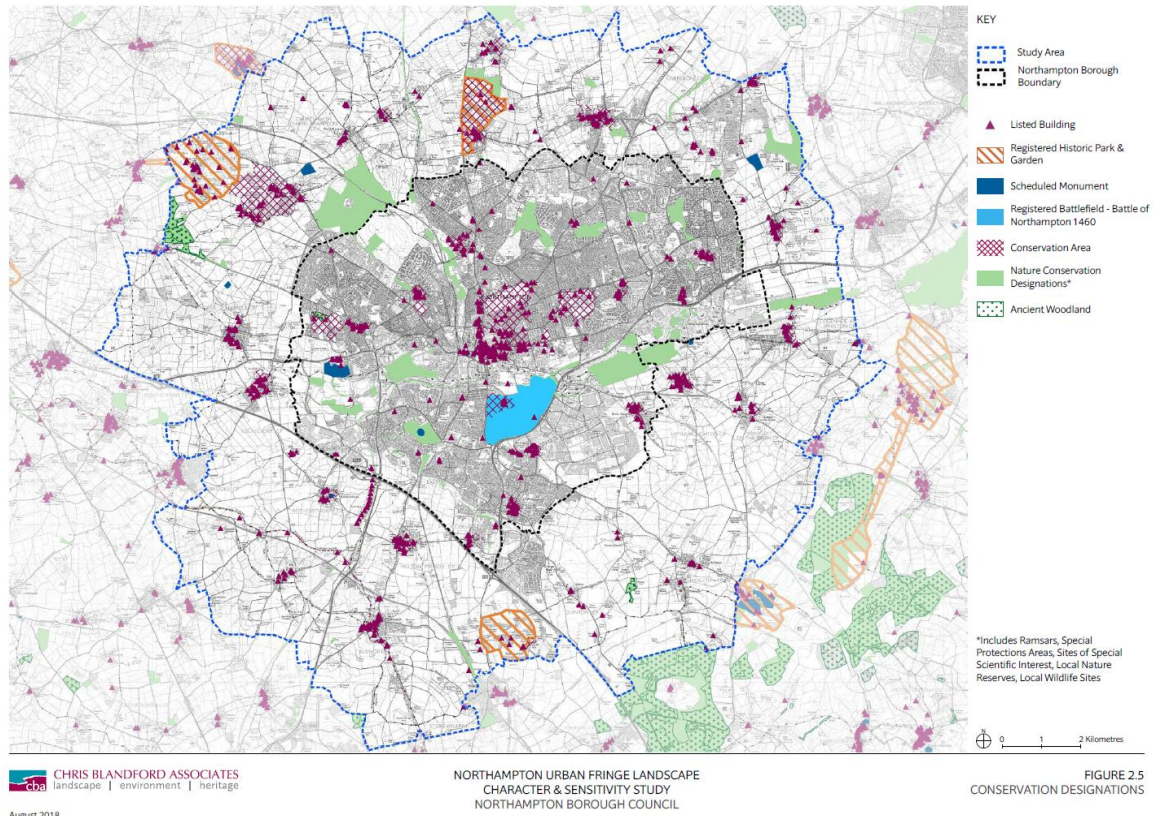
STANDARD OF HOTELS/YEAR ¹¹	PROJECTED NEW ROOMS REQUIRED		
	LOW GROWTH	MEDIUM GROWTH	HIGH GROWTH
3/4 Star Hotels			
2016 – 2019	45	56	67
2020 – 2024	83	109	137
2025 – 2029	123	168	216
Budget Hotels			
2016 – 2019	9	27	46
2020 – 2024	88	134	182
2025 – 2029	175	254	337
TOTAL NEW HOTEL ROOMS			
2016 – 2019	54	83	113
2020 – 2024	171	243	319
2025 – 2029	298	422	553

h. 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. Other heritage sites of interest includes 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)



i. 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.

¹⁰ Northampton Urban Fringe Landscape Character and Sensitivity Study (Chris Blandford Associates, 2018)

2.30 In addition, Northampton also has significant leisure provision, including commercial leisure centres, such as the centres run by the Leisure Trust (Danes 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.

i. Transport and Movement

2.31 80% of people who work in the Borough live in the Borough, 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 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 has a high level of car ownership, which is the dominant mode of travel.

2.32 The Borough 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.

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

¹¹ West Northamptonshire Joint Core Strategy Local Plan (Part 1)

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.

k. 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.

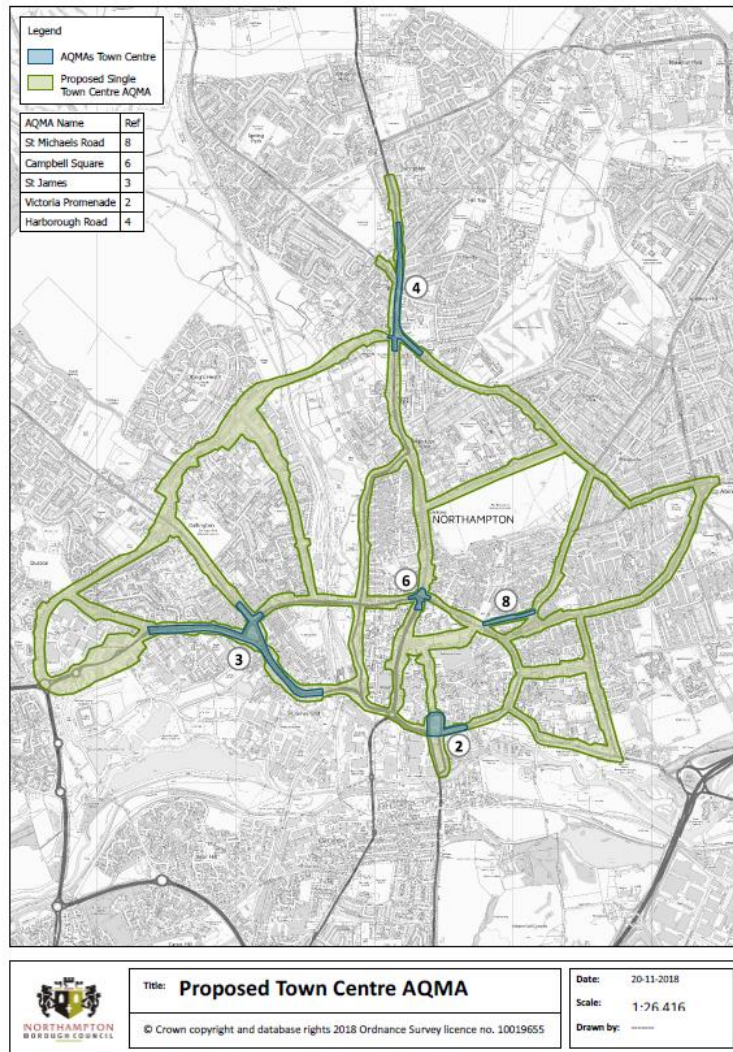
2.40 There are currently 7 Air Quality Management Areas (see Figure 8). These are areas which exceed the Government's air quality objective and where there is relevant exposure to the public. A consultation is presently underway to amalgamate all the central AQMAs into one large AQMA covering the town centre to promote consistency in applying the LES.

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. 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.

¹² Northampton Low Emission Strategy 2017 – 2025 (Northampton Borough Council, December 2017)

**Figure 8:
Air Quality Management Areas**



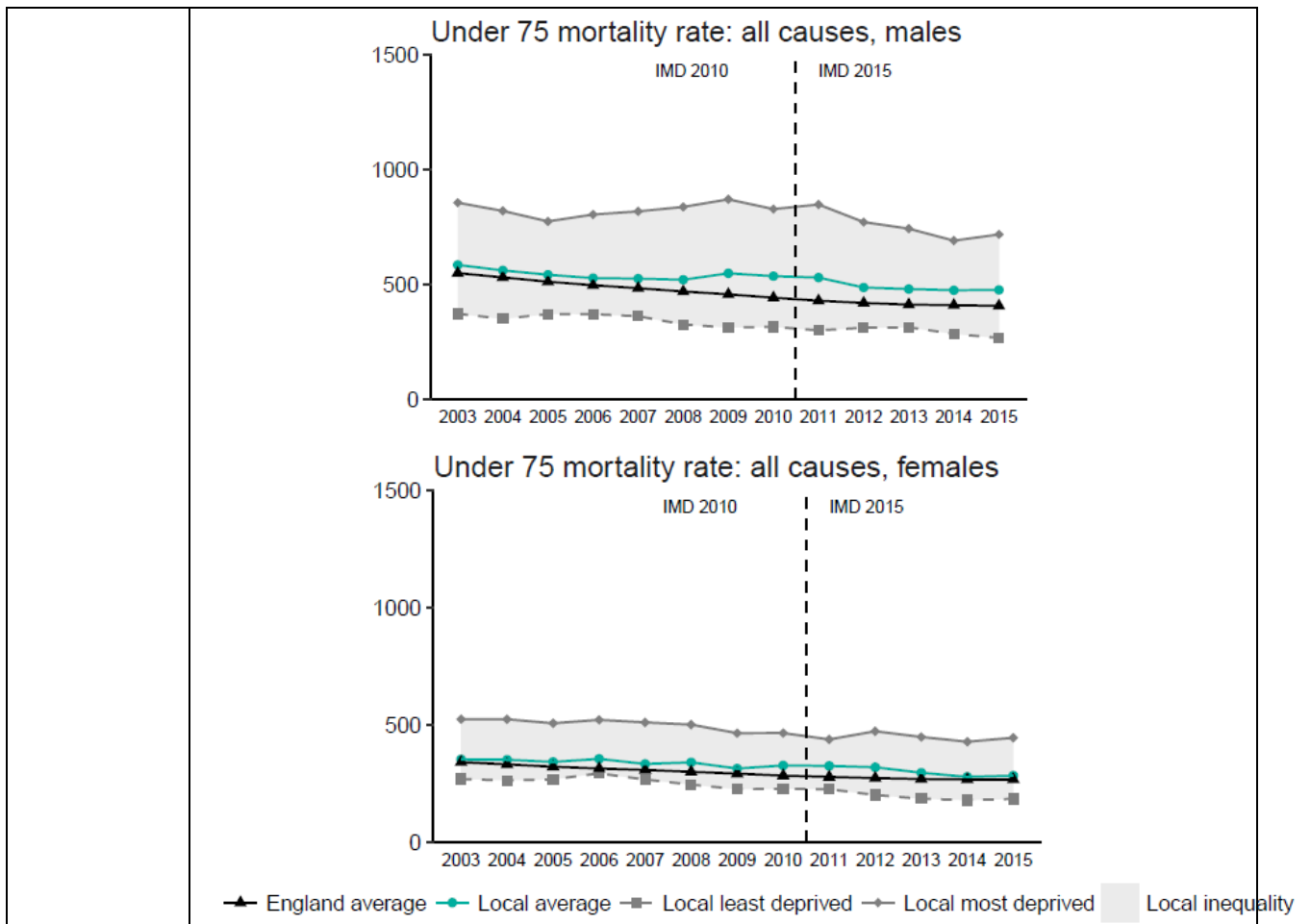
I. Health and Wellbeing

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.

¹³ Public Health England Northampton profile July 2018

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).
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	<p>The charts below show that Northampton has a larger gap in life expectancy for males and females compared to Northamptonshire.</p> <p align="center">Northampton</p> <p align="center">Northamptonshire</p>
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.

2.46 There is a need to ensure that 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

¹⁴ Public Health England, September 2019 - <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132696/pat/6/par/E12000004/ati/101/are/E07000154/iid/90366/age/1/sex/1>

Northampton General Hospital, GP surgeries, dentists, pharmacists and other health care providers.

B. KEY CHALLENGES AND OPPORTUNITIES FOR NORTHAMPTON

a. Challenges

i. 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 Council has declared a Climate Emergency in Northampton and is committed to a target of making Northampton carbon neutral by 2030.

ii. 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 does not have a 5 year housing land supply, though the Borough passed the Government's Housing Delivery Test in February 2020.

iii. 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

iv. 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. 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.

b. Opportunities

i. 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.

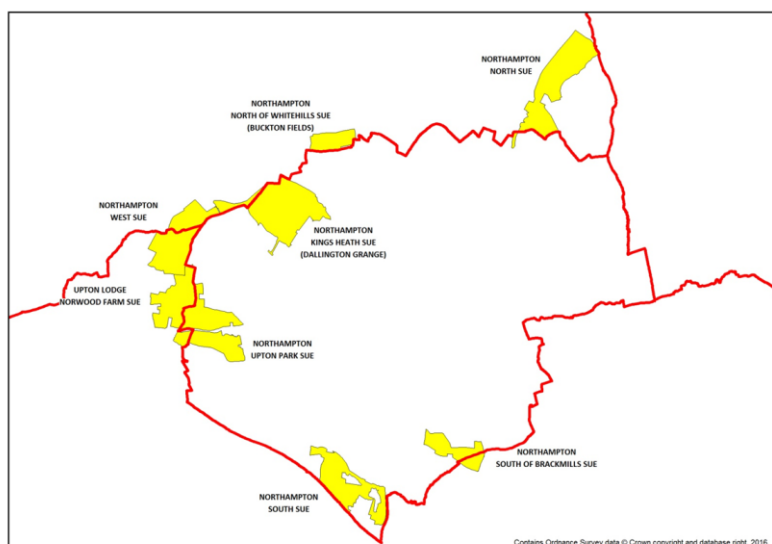
ii. Economic Opportunities

2.56 There is a further economic development opportunity in developing a co-ordinated approach to emphasise the historic identity of the borough, 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'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.

iii. 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



iv. 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 Council is seeking to maximise opportunities to increase the connectivity and range of destinations served by rail. Outside the Borough, 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 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/key-projects/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

a. 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 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 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.

b. 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.

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 these 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, 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

a. 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

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.

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.

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 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

a. 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. 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 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 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 National Design Guide¹⁶. The Council also believes that meeting Building for Life criteria helps achieve urban design principles. Building for Life (BfL) is a national

¹⁵ Design Companion for Planning and Placemaking (Urban Design London 2017)

¹⁶ National Design Guide (Ministry of Housing, Communities & Local Government, 2019)

standard for well-designed homes and neighbourhoods. The Council supports use of 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.

POLICY 2 PLACEMAKING

Development should be designed to promote and contribute to good placemaking through high quality, innovative and sustainable design which encourages the creation of a strong, locally distinctive sense of place by:

- Being well designed for the intended use(s), attractive and adaptable to future requirements.
- Incorporating a mix of easily accessible facilities for day to day living and enabling community interaction and cohesion, or providing easy access to those facilities nearby
- Creating healthy environments that prioritise people walking and cycling to reach local facilities and facilitate recreation
- Responding to and enhancing locally distinct townscape, landscape and historic environment characteristics
- Retaining, enhancing and creating important views and vistas into, out of and through the site responding to topography and landform where such opportunities arise
- 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

¹⁷ <http://www.sportengland.org/facilities-and-planning/design-and-cost-guidance/active-design/>

- 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
- Including 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
- Incorporating mixed-use buildings, taking amenity into account
- Ensuring plans for long-term maintenance are in place

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)**

b. 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:

- New development is not overbearing upon existing buildings or open spaces

- 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
- 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
- Shared circulation space and routes to private entrances within flatted development should be welcoming, and be naturally lit wherever possible
- Provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards, or successor guidance
- There is adequate access to both high quality recreational and semi-natural green spaces for all residents
- That large developments include high-quality public realm
- 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)

c. 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 Council has declared a Climate Emergency 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. 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.

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.

**POLICY 5
CARBON REDUCTION, COMMUNITY ENERGY NETWORKS, SUSTAINABLE
DESIGN AND CONSTRUCTION, AND WATER USE**

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:

- Adaptation to climate change
- Carbon reduction
- Water management
- Site waste management
- Use of materials
- How the proposals meet all other policies in this plan that relate to sustainability including:
 - Biodiversity and ecology;
 - Land, water, noise and air pollution;
 - Transport, mobility and access;
 - Health and wellbeing;
 - Culture, heritage and the quality of the built form

All development proposals should:

- Where possible, incorporate decentralised energy networks
- Ensure that new buildings and refurbishment of existing building stock

- adopt sustainable construction methods
- Actively promote energy efficiency and use of renewable energy sources where there is opportunity to do so

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 WJCS:
Policy S10 (Sustainable Development Principles)
Policy S11 (Low Carbon and Renewable Energy)

d. 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 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 Council’s Corporate Plan 2018-2020¹⁹ has 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.

¹⁸ [https://www3.northamptonshire.gov.uk/councilservices/health/health-and-wellbeing-board/Documents/NCC149648 Health Wellbeing Board Report A4 24pp AW2 NoBleed-Singles.pdf](https://www3.northamptonshire.gov.uk/councilservices/health/health-and-wellbeing-board/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>

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:

- 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. 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 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.

POLICY 6 HEALTH AND WELLBEING

The health and wellbeing of communities will be maintained and improved by requiring development to contribute to creating an age friendly, healthy and equitable living environment through:

- Creating an inclusive built and natural environment;
- Promoting and facilitating active and healthy lifestyles;
- Preventing negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality;
- Providing access for all to health and social care facilities; and
- 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.

The Council will support the provision of health facilities to accommodate primary and secondary needs in sustainable 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 WJCS:
Policy RC1 (Delivering Community Regeneration)
Policy RC2 (Community Needs)

e. 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 Northamptonshire County Council (NCC) is the lead local flood authority (LLFA) and is responsible for the coordination and management of flood risk. 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.

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 sets out the circumstances in which SUDs features would be adopted by Anglian Water.

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.

For all major development:

²⁰ <https://www.floodtoolkit.com>

²¹ <https://www.floodtoolkit.com/wp-content/uploads/2017/09/Local-Standards-for-publication-v1.3-September-2017.pdf>

- Suitable access must be provided and maintained for water supply and drainage infrastructure
- Sustainable drainage systems must be incorporated into the design

**Delivering WJCS:
Policy BN7 (Flood Risk)**

CHAPTER 6

NORTHAMPTON REGENERATION STRATEGY

a. 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.

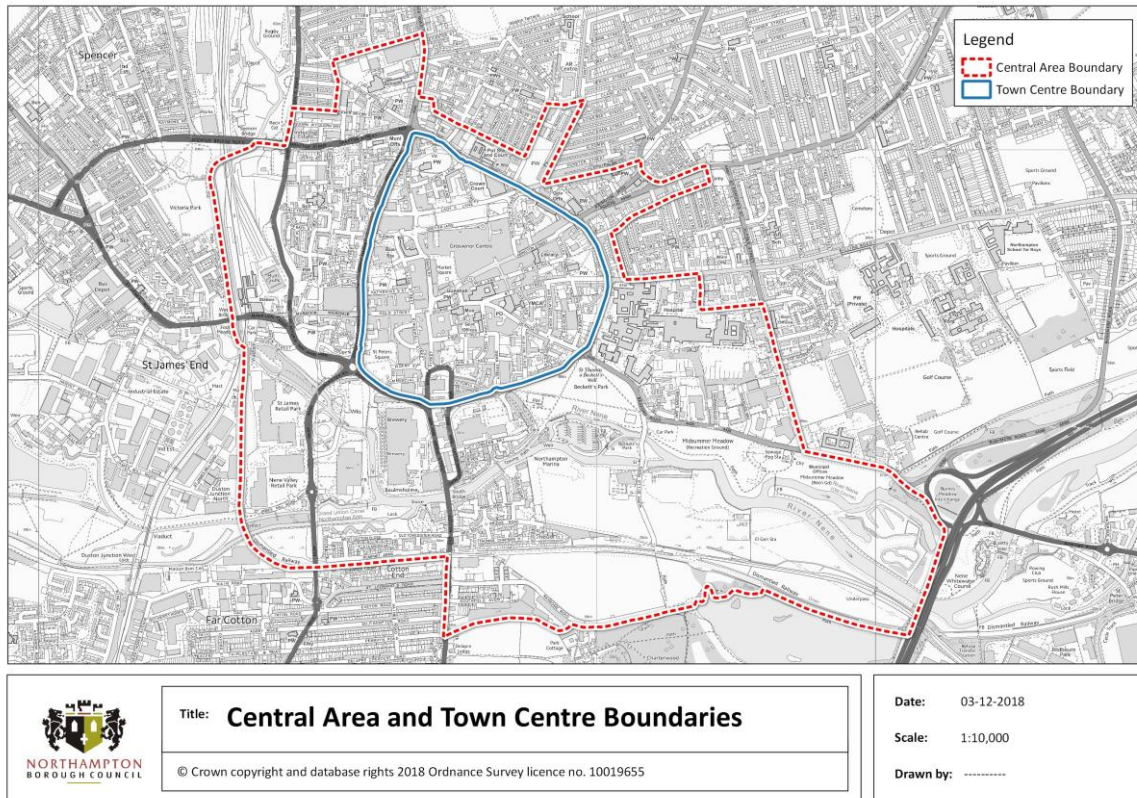
6.2 Planning policies should therefore take a positive approach towards town centre growth, management and adaptation. This emphasises the critical point that the roles of town centres are changing and the plan needs to provide a degree of flexibility which will allow the town centre to adapt accordingly 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



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 to both the resident population and the wider region. As a primary designated centre within 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

²² Northampton Retail and Leisure Study, Nexus Planning, (September 2018)

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.

b. 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, Dergate, 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.

²³ The Great British Brain Drain (Centre for Cities, November 2016)

6.13 In addition, 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
- 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 country.²⁴ 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

²⁴ Health on the High Street – Royal society for public health, 2018

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.

Delivering WJCS:
Policy S2 (Hierarchy of Centres)
Policy N1 (The Regeneration of Northampton)

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:

- Northampton Railway Station – any proposals should conform to Policy 39 of this Local Plan
- Four Waterside
- St Peter's Way – to the south of Gas Street roundabout
- Ransome Road – to the south of the University of Northampton Waterside campus. Any proposals should conform to Policy 43 of this Local Plan

Delivering WJCS:
Policy N1 (the regeneration of Northampton)
Policy N2 (Northampton Central Area)

c. 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.

<p>POLICY 10 SUPPORTING AND SAFEGUARDING THE UNIVERSITY OF NORTHAMPTON WATERSIDE CAMPUS</p> <p>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.</p>
<p>Delivering WNJCS: Policy E6 (Education, Skills and Training)</p>

d. 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 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.

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

²⁵ <https://www.northampton.ac.uk/news/new-jobs-for-northamptonshire-residents-thanks-to-waterside-campus/>

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**

Proposals for new hotel development including aparthotels and serviced apartment complexes will be supported in the following locations:

- Within the town centre boundary as defined in the Policies Map
- 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.

**Delivering WJCS:
Policy E7 (Tourism, Visitor and Cultural Industries)**

e. 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.

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

²⁶ Hotel Study (Hotel Solutions, 2016)

regeneration. So far, three 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). 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 straddle the borough boundary) 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.

**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

A HOUSING DELIVERY

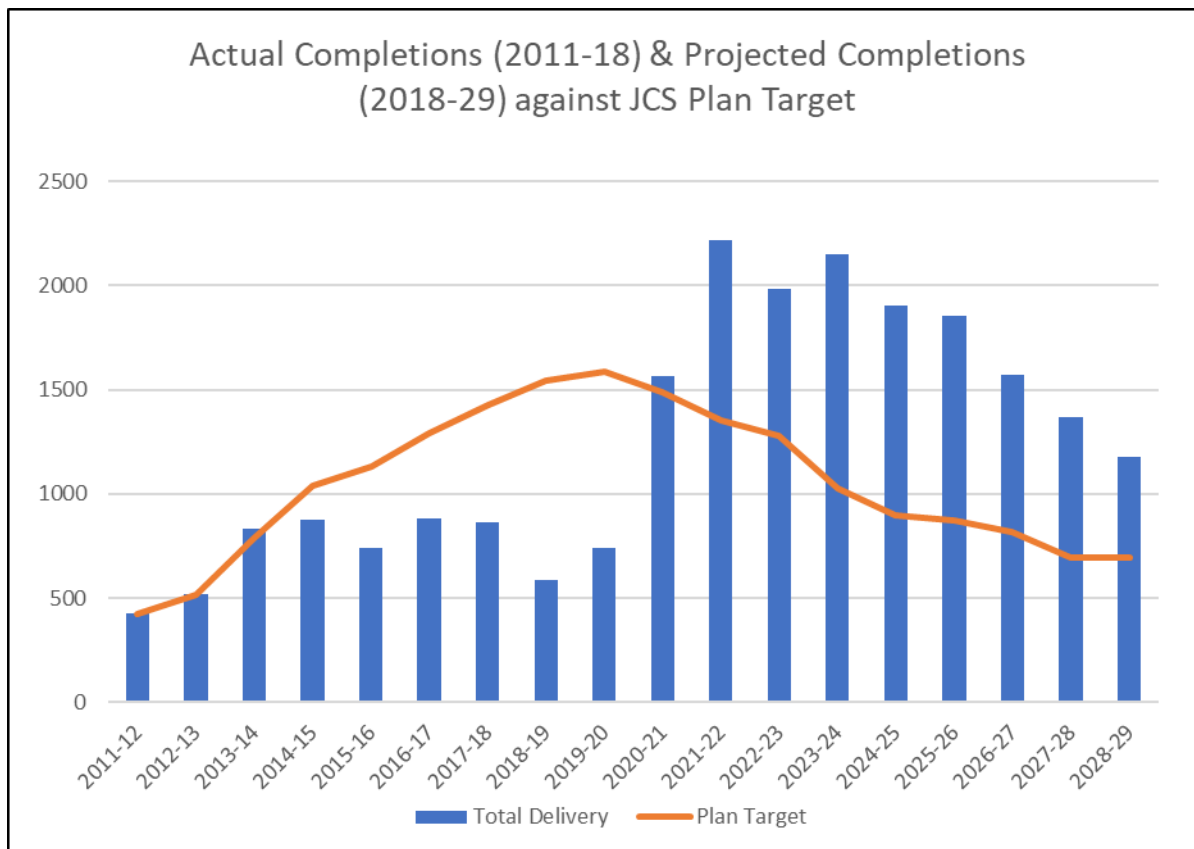
a. Current Provision

7.1 The West Northamptonshire Joint Core Strategy (JCS) established an objectively assessed need of 25,758 dwellings for Northampton between 2011 and 2029. 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, 5,727 dwellings had been delivered, against a JCS requirement to allocate sufficient sites (allowing for windfall) to accommodate 8,157 new dwellings in Northampton by that time. The number of dwellings delivered by 1st April 2019 falls some 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.

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).

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)

Table 6: Housing commitments (including Joint Core Strategy allocations), proposed allocations and windfall

	JCS requirement 2011-2019	Net completions 2011-19	Delivery of dwellings compared to JCS requirement
Total dwellings	8157	5727	-2430

Site name	Status as at 1st April 2019	Dwellings completed as at 1st April 2019	Remaining capacity to 1st April 2029	Remaining capacity forecast to be delivered after 1st April 2029
N5 (Northampton South SUE)	Not implemented. N/2013/1035 (outline permission) Reserved matters for phase 1 – 349 dwellings approved	0	636	364
N6 (Northampton South of Brackmills)	Not implemented. N/2013/0338 (appeal allowed)	0	1115	0
N7 (Northampton Kings Heath SUE – Dallington Grange)	Not implemented. N/2014/1929 (live application)	0	2000	1000
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	861	0
N9A (Northampton Upton Lodge SUE)	N/2017/0091 (live application for 1,400 dwellings)	0	1347	53

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						
3,394						

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 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

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).

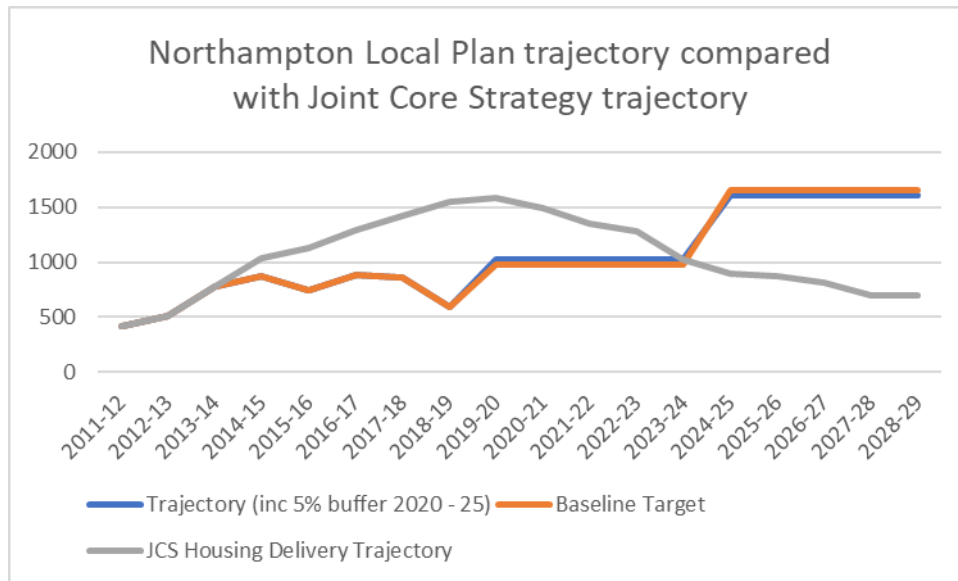
7.9 Taking into account the fact that delivery rates have proven to be low since 2011, particularly in Sustainable Urban Extensions, this surplus of 3,394 dwellings has been deducted from the requirement for 2019 – 2024 and a flat rate delivery rate of 1,030 dwellings per year has been applied to those years. This is a conservative approach which allows some contingency in case the SUEs continue to under-deliver, 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 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:

Ref	Location	Indicative Dwelling Capacity
0168	Rowtree Road	131
0171	Quinton Road	19
0174	Ransome Road Gateway	24
0193	Former Lings Upper School, Birds Hill Walk	60 (5YHLS)
0195	Hunsbury School, Hunsbury Hill	73 (50 in 5YHLS)
0204	The Farm, Hardingstone	100
0205	Parklands Middle School, Devon Way	132 (5YHLS)
0288*	Northampton Railway Station car park	68 (5YHLS)
0333*	Northampton Railway Station (railfreight)	200
0335	Chronicle & Echo North	42 (6 in 5YHLS)

		Net 36
0336	Chronicle & 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)
0657	Fraser Road	140
0685	Adj 12 Pennycress Place, Ecton Brook Road	12
0719	Car garage workshop, Harlestone Road	35
0720	Ryland Soans garage, Harlestone Road	62
0767	Spencer Street	25 (5YHLS)
0903	Hawkins Shoe Factory, Overstone Road	105 (5YHLS)
0910	379 Harlestone Road	14
0932	Site 1 Southbridge Road	44 (5YHLS)
0933	Site 2 Southbridge Road	50 (5YHLS)
1006	Pineham	106
1007	Land south of Wooldale Road, east of Wootton Road	22
1009	Land west of Policy N5 Northampton South SUE (site 1)	100
1010*	Land at St Peter's Way/ Court Road/ Freeschool Street	5
1013	University of Northampton Park Campus	653 (5YHLS)
1014	University of Northampton Avenue Campus	200
1022	Belgrave House	99 (5YHLS)
1025	Land to the west of Towcester Road	180
1026	Eastern Land Parcel, Buckton Fields	14
1036	Derwent Drive garage site, Kings Heath	8
1037	Swale Drive garage site and rear/ unused land	6 (5YHLS)
1041	Newnham Road, Kingsthorpe	15
1048	Stenson Street	6
1049	Land off Arbour Court, Thorplands garage block	11
1051a	Land between Waterpump Court and Billing Brook Road	8

1052	Land rear of garages in Coverack Close	13
1058	Land off Oat Hill Drive, Ecton Brook	11
1060	Hayeswood Road, Lings	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 Holmecross Road	15
1096	Land off Mill Lane	14
1097	Gate Lodge	30
1098*	The Green, Great Houghton	800
1099	Upton Reserve Site	40
1100	Hill Farm Rise, Hunsbury Hill (50% of the site)	80
1102	Site east of Towester Road	50
1104	Watering Lane, Colingtree	265
1107	Former Abington Mill Farm, land off Rushmere Road	125
1108	Former Dairy Crest depot, Horsley Road	35
1109	Mill Lane	6 (5YHLS)
1113*	Greyfriars	400
1114	Cedarwood Nursing Home, 492 Kettering Road	2 (5YHLS)
1117	133 Queens Park Parade	6 (5YHLS)
1121	Upton Valley Way East	34 (5YHLS)
1123	83-103 Trinity Avenue	9 (5YHLS)
1124	41 – 43 Dergate	7 (5YHLS)
1126	5 Primrose Hill	6 (5YHLS)
1127	32 Connaught Street	6
1131	The Leys Close, 39 Mill Lane	6 (5YHLS)
1133	Eastern District Social Club	5 (5YHLS)
1134	St Johns Railway Embankment	12
1137	Wootton Fields	74
1138	Land south of Old Bedford Road	7
1139*	Ransome Road	200 (500 in 5YHLS)
1140	Land north of Milton Ham	224
1142	Land west of Northampton South	130

	SUE (site 2)	
<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 S4 (Scale and Distribution of Housing Development) Policy S4 (Northampton Related Development Area)</p>		

B. 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.

b. Affordable housing

7.13 JCS Policy H1 sets criteria for the density, mix and type of dwellings for 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%.

c. 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.

³¹ West Northamptonshire Joint Planning Unit – Housing Market Evidence 2017, Opinion Research Services

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

d. 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 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.

e. 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:

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

f. Specialist Housing

7.20 Accordingly, a significant proportion of new dwellings will need to be accessible and adaptable dwellings to Category 2 standards in Building Regulations. 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 be built to wheelchair user dwelling standard (Category 3 of the Building Regulations) and 8% of all affordable housing.

**POLICY 14
TYPE AND MIX OF HOUSING**

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.

Housing mix

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-social-care/policies/Documents/Transforming%20Care%20Accommodation%20Plan.pdf>

³³ NCC JSNA - <https://www3.northamptonshire.gov.uk/councilservices/health/health-and-wellbeing-board/northamptonshire-jsna/Pages/default.aspx#GlossaryGroupOverview>

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

On sites of more than 100 dwellings, 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.

Plots which have remained vacant for 3 years can revert to other forms of housing provision.

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

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.

To meet the needs of 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.

4% of all new market dwellings and 8% of affordable dwellings should be constructed to Building Regulations Part M4(3) (Wheelchair user dwellings) standards, or their successor, to enable wheelchair accessibility.

**Policy H2 (Affordable Housing) Delivering WNJCS:
Policy H1 (Housing Density and Mix and Type of Dwellings)
Policy H2 (Affordable Housing)**

g. Houses in Multiple Occupation

7.21 Houses in multiple occupation (HMOs) continue to contribute towards 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 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 within the Borough.

³⁴ A Study of Houses in Multiple Occupation Policy (Loughborough University, November 2018)

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)

**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)**

C. GYPSIES AND TRAVELLERS

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**

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.

Applications for planning permission must meet the following criteria:

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)

- 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.

Replaces Policy H6 of the Joint Core Strategy

CHAPTER 8 ECONOMY

a. 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. In

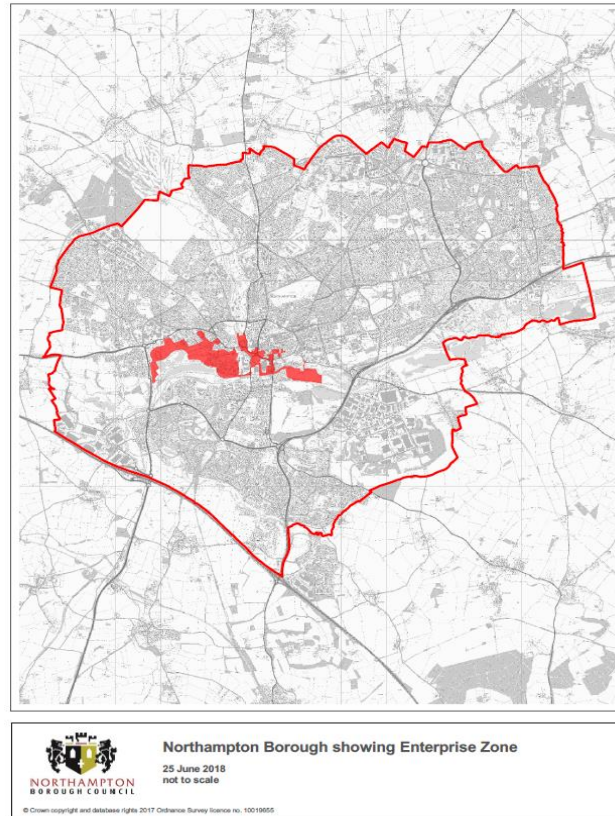
³⁹South East Midlands Local Industrial Strategy - <https://www.semlep.com/industrial-strategy/>

⁴⁰ <https://www.gov.uk/government/publications/the-oxford-cambridge-arc-government-ambition-and-joint-declaration-between-government-and-local-partners>

⁴¹ Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes-Oxford Arc (National Infrastructure Commission, November 2017)

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 the Borough, 79% employ 0 to 4 people, 28% have a

⁴² <https://www.centreforcities.org/wp-content/uploads/2019/01/19-01-28-Cities-Outlook-2019-Full.pdf>

turnover of £50,000 to £99,000 and 31%, a turnover between £100,000 and £249,000⁴³.

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.

b. 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

⁴³ UK Business: activity, size and location (Office of National Statistics, 2019)

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.

**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:

- 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.
- 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 marketing undertaken over a 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)

c. 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 Borough (+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.

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 2008 – 2017	+3,500	+11,000	+7,000	+21,500

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

⁴⁷ West Northamptonshire Joint Annual Monitoring Report (2017/18)

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 the proposed uses and associated employment activities can be carried out without causing harm to residential amenity;
- ii. The site can demonstrate good accessibility by walking, cycling and public transport.

Delivering WJCS:

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

a. 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.

b. NEW RETAIL PROVISION

9.5 The Council aims to maintain and enhance the vitality and viability of the borough's town centre, district centres and local centres. Focusing investment in the borough's existing centres will help to promote their economic prosperity as well as help to ensure that economic activity takes place in the most sustainable locations easily accessible by modes of travel other than the private car.

⁴⁸ Northampton Retail and Leisure Study (Nexus Planning, October 2018)

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
2036	8,900	11,300	12,900	17,600

c. 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

⁴⁹ Northampton Retail and Leisure Study (Nexus Planning, September 2018)

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.

d. 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 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 the Borough.

**POLICY 19
NEW RETAIL DEVELOPMENTS AND RETAIL IMPACT ASSESSMENT**

The Council will support the provision of between 7,000 sq.m and 8,900 sq.m net of convenience retail floorspace and between 5,300 sq.m and 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

The Council will support proposals which meet the following criteria:

- 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

- 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
- Within the defined Primary Shopping Area, development proposals should:
 - i. 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
 - ii. Provide an active frontage and be open for business during the day
- 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)

e. 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 report ⁵⁰referred to the following as being linked to the rise in obesity:

⁵⁰ Obesity and health and wellbeing in Northampton (Public Health Northamptonshire, March 2020)

- 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 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 school.

**Delivering WJCS:
Policy**

⁵¹ Using the planning system to promote healthy weight environment (Public Health England, 2020)

f. 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.

**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.

**Delivering WNJCS:
Policy S2 (Hierarchy of Centres)**

g. NEIGHBOURHOOD CENTRES

9.17 In addition to ensuring that 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.

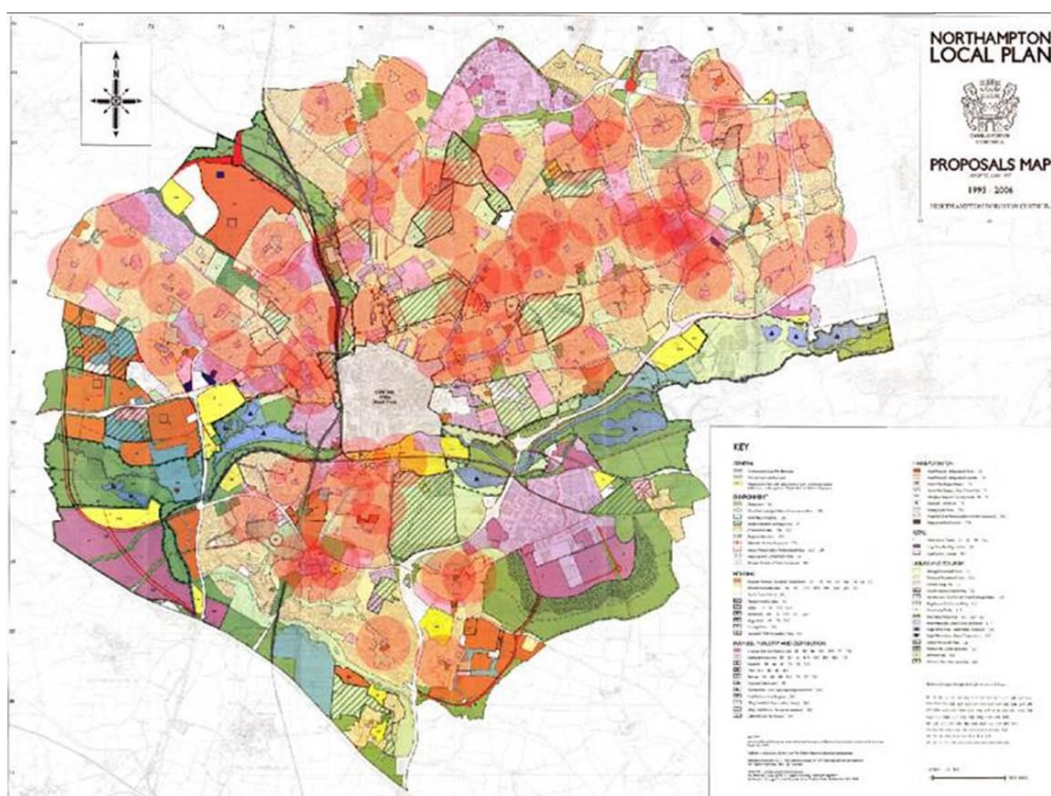
9.18 There are around 60 neighbourhood parades in Northampton which cater for the day to day needs of the local community. They are smaller in size than the local centres defined through the West Northamptonshire Joint Core Strategy. However, they vary in terms of success, sizes, occupancy and facilities.

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:

- There is an existing neighbourhood centre within a 400m radius
- 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)

h. 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.

i. 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.

i. 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 pitches used by communities across Northampton, the Sustainable Urban Extensions as well as Daventry and South Northamptonshire. Examples of playing pitches in Northampton include those in secondary schools (such as Northampton

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)

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, hockey, baseball, rugby league and gaelic football.

POLICY 23
SPORTS FACILITIES AND PLAYING PITCHES

- Sports facilities and playing pitches, as defined in the justification text, should be safeguarded from development unless:
 - a) An assessment has been undertaken which has clearly shown that the facility is surplus to requirements;
 - b) 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
 - c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use

- 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:
 - Adequate alternative provision exists within 800m (10 minutes) walking distance; and
 - All reasonable efforts have been made to preserve the facility but it has been demonstrated that it would not be economically viable or feasible

Major developments are expected 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.

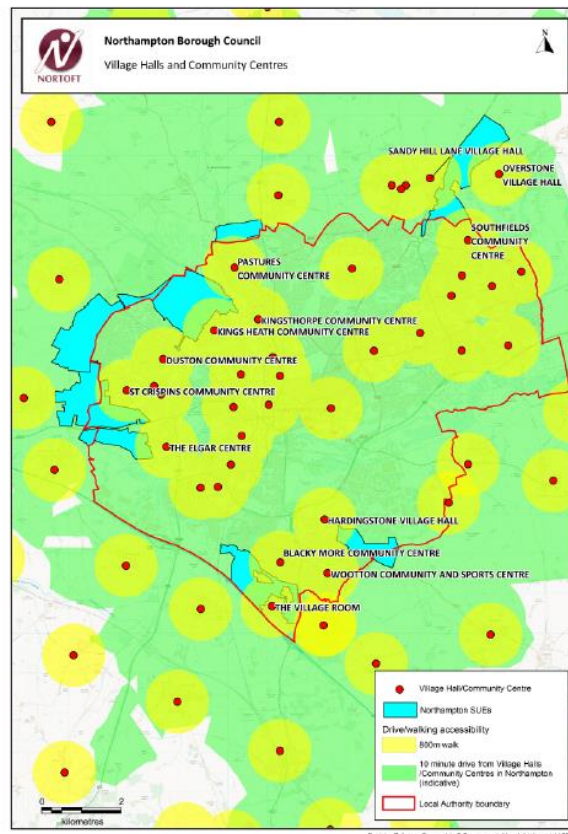
Delivering WNJCS:
Policy RC2 (Community Needs)

k. 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.

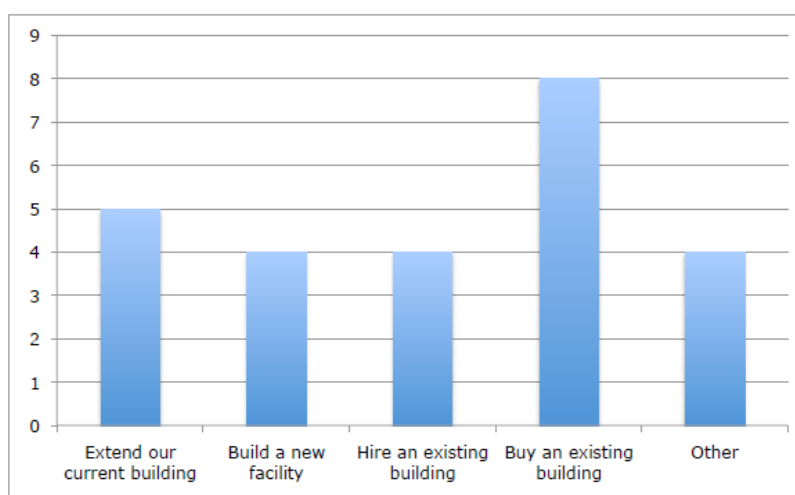
Figure 13: Village and community hall locations in Northampton and its adjoining area



9.29 The Built Facilities Study⁵⁷ 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 commissioned⁵⁸ 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.

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

⁵⁷ Northampton Open Space, Sport and Recreation Study – Part 2 (Nortoft, March 2018)

⁵⁸ Northampton Faith Communities Profile and Places of Worship Audit and Needs Assessment (CAG, June 2013)

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:

- The property/ site should be accessible by public transport and other sustainable transport modes including walking and cycling
- Any proposal should not result in any significant, adverse impact on the residential amenity of the area including impacts associated with noise and traffic

Development resulting in the loss of an community facility, which is well used and valued, will only be acceptable in the following circumstances:

- Adequate alternative provision exists within 800m (10 minutes) walking distance; and
- 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)**

I. 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:

- Locate premises within sustainable locations, with good public transport facilities, access to cycling and walking routes, and away from major roads
- Maximise the use of current educational establishments
- Ensure that new developments are accessible and inclusive for a range of users, including disabled people
- 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)**

m. 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.⁵⁹

9.36 The Borough 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 Council⁶⁰ 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.

⁵⁹ Northampton Faith Communities Profile and Places of Worship Audit and Needs Assessment (CAG, June 2013)

⁶⁰ Northampton Burial Space Need and Provision Study (Enzygo, 2018)

**POLICY 26
SITES FOR BURIAL SPACE**

To meet the need for future burial spaces, the following sites, as indicated on the Policies Map, will be allocated for this use:

- Land adjoining Kingsthorpe cemetery
- Land adjoining Dallington cemetery
- Land adjoining Towcester Road cemetery

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.

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 biodiversity.

**Delivering WJCS:
Policy RC2 (Community Needs)**

CHAPTER 10 BUILT AND NATURAL ENVIRONMENT

A. THE NATURAL ENVIRONMENT

a. 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 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

New developments must ensure that existing green infrastructure assets will be protected, managed, maintained and connected to enhance their multi-functionality.

All housing developments of 15 dwellings or more will be expected to deliver and / or contribute to the green infrastructure projects. Applications must be accompanied by a site-specific green 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 network beyond the site boundary.

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)

b. 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 churchyards⁶¹. Figure 12 provides a snapshot of their locations with 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 Plan⁶². There is a significant variation in the distribution, quality, accessibility and connectivity of these open spaces.

10.9 The Open Space, Sport and Recreation Study⁶³ (OSSR) outlined the baseline of open spaces in Northampton, determined the classification and set the quality, quantity and accessibility standards for the Borough. The types were 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

⁶¹ Open Space, Sport and Recreation Study (Northampton Borough Council, with technical evidence supplied by Nortoft, March 2018)

⁶² Northampton Green Infrastructure Plan (Fiona Fyfe Associates, 2016)

⁶³ Open Space, Sport and Recreation Study (Northampton Borough Council, with technical evidence supplied by Nortoft, March 2018)

	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 wellbeing⁶⁴.

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 in the Planning Obligations Supplementary Planning Document 2013. Any updates to the SPD will incorporate the formulae.

**POLICY 28
PROVIDING OPEN SPACES**

New major developments must ensure that open spaces defined on the Policies Map are sustained or enhanced.

Major developments will be required to contribute to open space provision as per the standards below.

Open space type	Planning standards for new developments		
	Quantity per 1,000 population	Maximum distance of provision from all parts of proposed development	Reference quality standard to be applied
Parks and Gardens	1.43ha per 1,000	710m	Green Flag standard in association with the Local Quality Vision Statement
Amenity Green Space	1.45ha per 1,000	480m	NBC Assessment Framework in association with the Local Quality Vision Statement
Natural and Semi Natural Green Space	1.57ha per 1,000	720m walk	NBC Assessment Framework

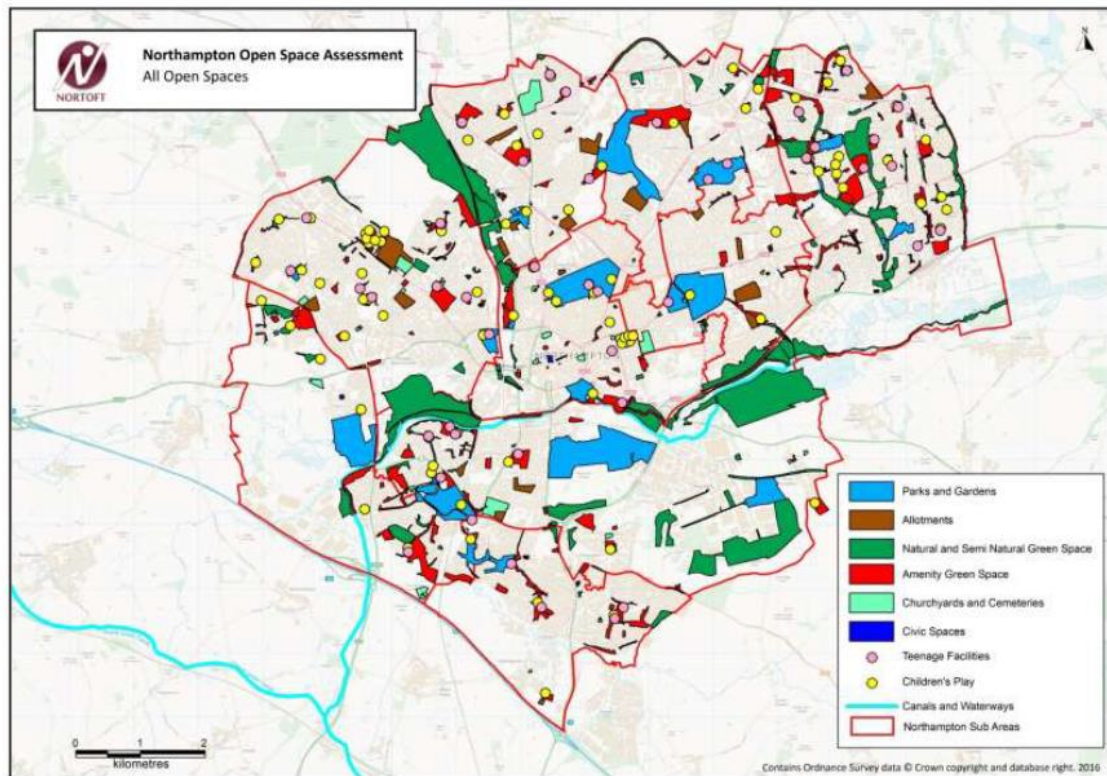
⁶⁴ Green Space and Health (Parliamentary Office of Science & Technology, POSTnote 538 October 2016)

Children's Play and provision for young people	0.25ha per 1,000 of Designated Equipped Playing Space including teenage provision	400m for LEAP 1,000m for NEAP 1,000m for teenage facilities	New LEAPs and NEAPs should meet the Fields in Trust 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	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		
Cemeteries and closed churchyards	Specific to the locality. No set standard required		

Where standards cannot be met on site, developers are required to contribute towards off site provision.

Delivering WJCS:
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)



c. Biodiversity and Geodiversity

10.12 The Borough of 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.

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.
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.

Delivering WNJCS:
Policy BN2 (Biodiversity)

d. 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 non-breeding 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 Document⁶⁵ (SPD) was adopted by 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 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.

10.18 Since the adoption of the WNJCS, Natural England has continued to monitor visitor pressure on the SPA. Evidence⁶⁶ 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.

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 routes

⁶⁵ Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document (Northampton Borough Council, August 2015)

⁶⁶ Natural England consultation response (June 2016)

- 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. 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 importance 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.

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.

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.

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 WJCS:

Policy BN4 (Upper Nene Valley Gravel Pits Special Protection Area)

B. 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.

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 man-made 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 study⁶⁷ 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 NON-DESIGNATED 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:

- 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
- Ensuring that this enhanced understanding has been considered and incorporated into the development proposal demonstrating how the scheme preserves and/ or enhances the asset
- Requiring a clear and convincing justification for any harm or loss of an asset, supported by demonstrating how harm is outweighed by public benefits
- Supporting high quality proposals which positively considers Northampton's local distinctiveness including aspects associated with siting, scale, massing, layout, form, materials and architectural detailing
- Being consistent with guidance from Historic England and heritage best practice

Proposals which will result in an increased and/ or improved accessibility to heritage assets will also be supported.

Delivering WJCS:

Policy BN5 (The Historic Environment and Landscape)

⁶⁷ Northampton Urban Fringe Landscape Character & Sensitivity Study (Chris Blandford Associates, November 2018)

CHAPTER 11 MOVEMENT

A. OVERVIEW

11.1 The transport network within and connecting to 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 Plan⁶⁸ 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.

⁶⁸ Northamptonshire Transport Plan: Fit for Purpose (Northamptonshire County Council, 2012)

11.6 Northampton Borough 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.

B. MANAGING NORTHAMPTON'S TRANSPORT AND MOVEMENT

a. 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 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 Strategy⁶⁹ (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 has revoked two Air Quality Management Areas designations where NO₂ levels have improved.

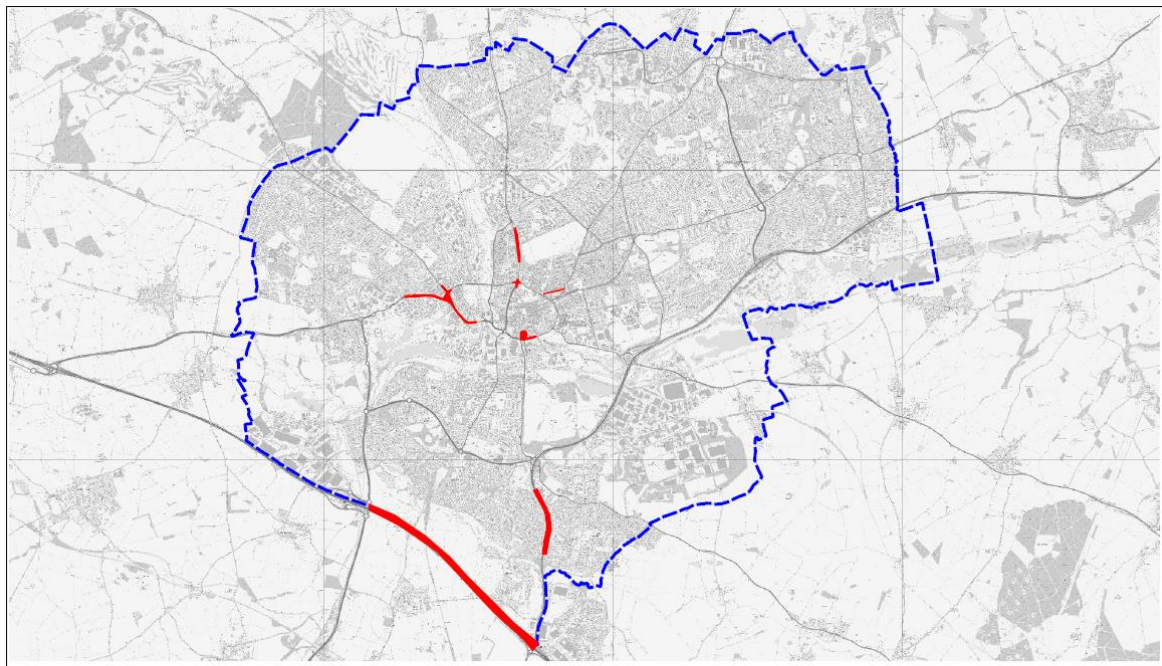
11.10 There are currently seven Air Quality Management Areas (see Figure 17). These are areas which exceed the Government's air quality objective and where there is relevant exposure to the public. NBC and NCC will also undertake a detailed assessment of current and future air quality to 2025, taking into account predicted traffic growth in the Borough. In addition, the 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.

⁶⁹ Northampton Low Emission Strategy 2017 – 2025 (Northampton Borough Council, December 2017)

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 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.

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.

Developments should be designed to incorporate, demonstrate and achieve the following sustainable travel principles:

- To promote, improve and encourage active lifestyles and health and well-being
- To promote modal shift away from and reduce car usage
- To improve accessibility by, and usability, of sustainable transport modes including public transport
- To maximise opportunities for integrated secure and safe walking and cycling routes which connect to the existing network, as well as open spaces and green infrastructure
- To secure a high quality design of the street scene which creates a safe, secure and pleasant environment
- To upgrade and improve the existing street scene
- 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
- 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.

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)**

b. 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:

- There would be no adverse impacts on the local and/or strategic transport network which cannot be mitigated against. Major planning applications and

development proposals that generate a significant number of traffic movements must be accompanied by a Transport Assessment

- They are designed to allow safe and suitable means of access and site operation

**Delivering WNJCS:
Policy C2 (New Developments)**

c. 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 & 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 Oxford-Cambridge 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.

11.17 A safeguarded corridor between Brackmills and Castle 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.

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 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 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**

The route of the former Northampton to Market Harborough railway line, as shown on the Policies Map, is safeguarded for future transport use.

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.

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.

Transport schemes which provide an element of environmental protection will be prioritised. In some cases, it may be necessary to provide mitigation in line with table 10 of the Northampton Low Emission Strategy 2017 or the appropriate part of a successor document.

**Delivering WNJCS:
Policy C3 (Strategic Connections)**

d. 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 the principles set out in the Parking Standards SPD, including the provision of facilities for electric vehicle charging points. Transport 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

a. 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 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 Plan⁷⁰ 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 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.

b. 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 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 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

⁷⁰ Infrastructure Delivery Plan (West Northamptonshire Joint Planning Unit, 2017)

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 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.

c. 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 Northampton 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 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.

d. EDUCATION

12.11 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 County Council 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. 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.

12.13 The funding provision for education is provided through a number of mechanisms including from the Government, the Education Funding Agency and through securing funding from developers via Section 106 Agreements and the Community Infrastructure Levy. 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, where it is to be located and the associated cost.

e. LIBRARIES

12.14 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.

f. 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**

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.

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.

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.

Funding provision will be sought from a number of mechanisms including from developer contributions and the Community Infrastructure Levy.

Delivering WJCS:

Policy INF1 (Approach to Infrastructure Delivery)

Policy INF2 (Contributions to Infrastructure Requirements)

CHAPTER 13

SITE SPECIFIC ALLOCATIONS AND POLICIES

a. 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.

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 Holmecross 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, Horsley 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.

B. SITE SPECIFIC POLICIES

a. 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, 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 Assessment⁷¹ 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

⁷¹ Heritage Impact Assessment (Iceni, June 2020)

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.

POLICY 39

NORTHAMPTON RAILWAY STATION (LAA0288), RAILFREIGHT AND ADJOINING SITES (LAA0333)

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.

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.

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.

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.

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 uses.

On site LAA0333, the Council will support the delivery of at least 200 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).

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.

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).

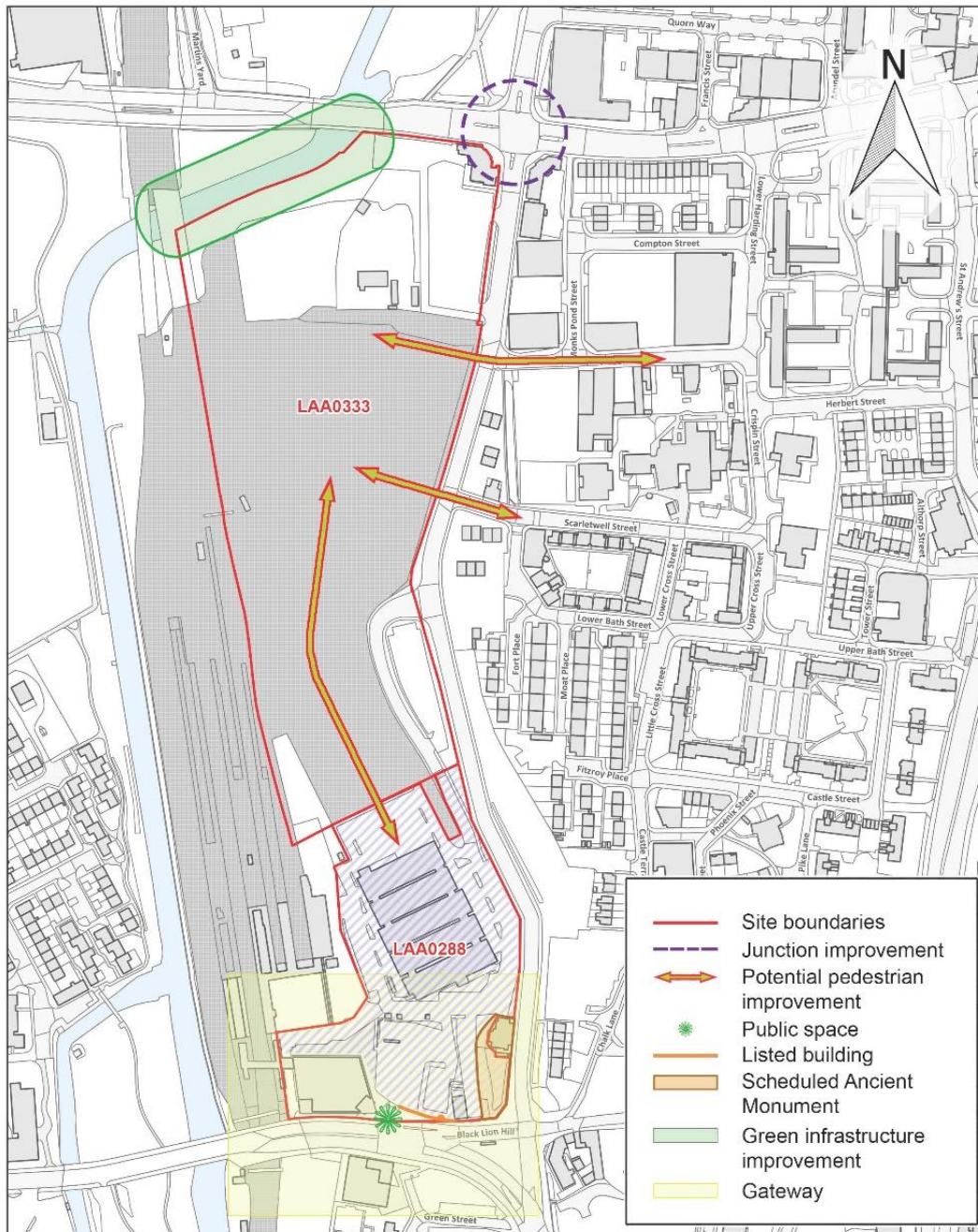
The following design principles are to be incorporated into any master planning and/or planning application proposals for the two sites:

- A high quality development that preserves and enhances the significance of the former castle site and in particular the scheduled monument and listed Postern Gate and the setting of these heritage assets. The proposals should provide opportunities to enhance the significance of the identified heritage assets
- Development across the whole area needs to be considered in an integrated manner
- This high-quality development must secure permeability within the site for pedestrians and cyclists
- 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
- Opportunities should be explored for development to enhance the site's relationship to the Brampton Arm of the River Nene.

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.

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 18
DEVELOPMENT PRINCIPLES FOR NORTHAMPTON RAILWAY STATION AND
RAILFREIGHT SITES





NORTHAMPTON
BOROUGH COUNCIL

LAA0288 - Railway Station car park
LAA0333 - Castle Station (Rail Freight)

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b. 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)

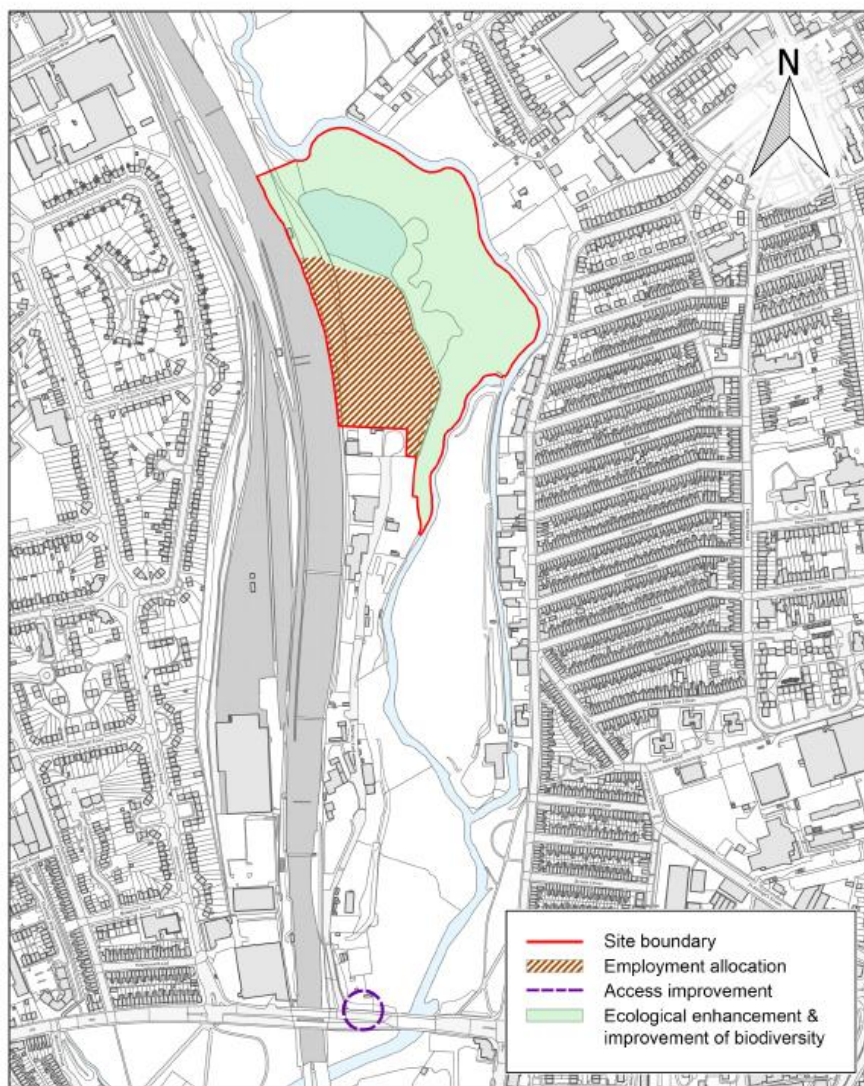
The Council supports the extension of the Martin's Yard employment area for employment purposes to meet local demand, subject to the following criteria and principles shown in Figure 19:


- The extension for employment use will be restricted to the area shown
- 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
- 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.
- A landscape barrier will be required between the employment area and the residual land
- The layout of the development should be designed to take into account any existing sewers and water mains within the site.
- Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS).

- Any application must demonstrate how it will improve water quality in the surrounding area.

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
Land north of Martins Yard, Spencer Bridge
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c. 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.

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 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 determining the presence/ absence, nature and extent of any such remains. This should inform a mitigation strategy for any subsequent development.

**POLICY 41
THE GREEN, GREAT HOUGHTON (LAA1098)**

Housing development of up to 800 dwellings, which comply with the development principles shown on Figure 20 will be supported, subject to the following criteria being met:

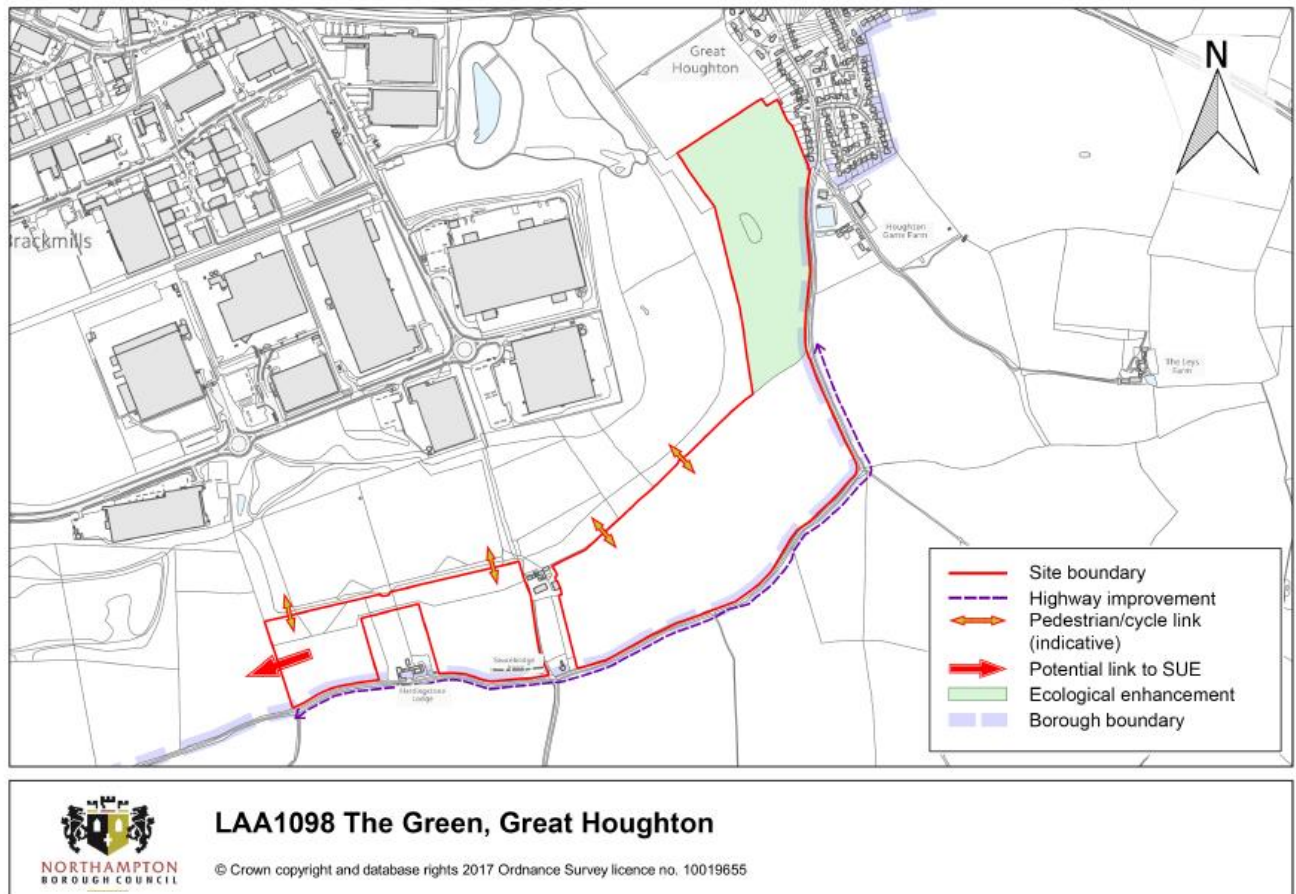
- Surveys are undertaken to identify whether the site is used by over-wintering Golden Plover / Lapwing i.e. to be carried out in the winter. If significant

numbers of Golden Plover or Lapwing are identified at the site, offsite mitigation 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 area shaded green in the diagram
- The scheme 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
- 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
- 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
- The development provides suitable transport links to neighbouring developments, including neighbourhood centres and community facilities
- 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
- Any proposal that comes forward should include suitable measures to mitigate the impact of additional traffic generated by the development
- Any proposal should also include air quality and noise impact assessment from the Brackmills Industrial Estate
- Any application on the site will need to be accompanied by an archaeological investigation that considers any archaeological potential on the site
- 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 20
DEVELOPMENT PRINCIPLES FOR LAND AT THE GREEN, GREAT HOUGHTON



d. 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)**

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.

Any proposals should conform to the development principles shown in Figure 21 and will need to ensure that they:

- 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
- 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
- Be outward looking towards maximising external active frontages particularly at ground floor level
- Ensure that new development is well related, sympathetic and responsive to the character and heritage assets of the surrounding areas
- 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

- Ensure the provision of appropriate levels of secure and safe vehicle parking which are consistent with parking requirements
- 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

The layout of new development should be designed to take into account existing sewers and water mains within the site.

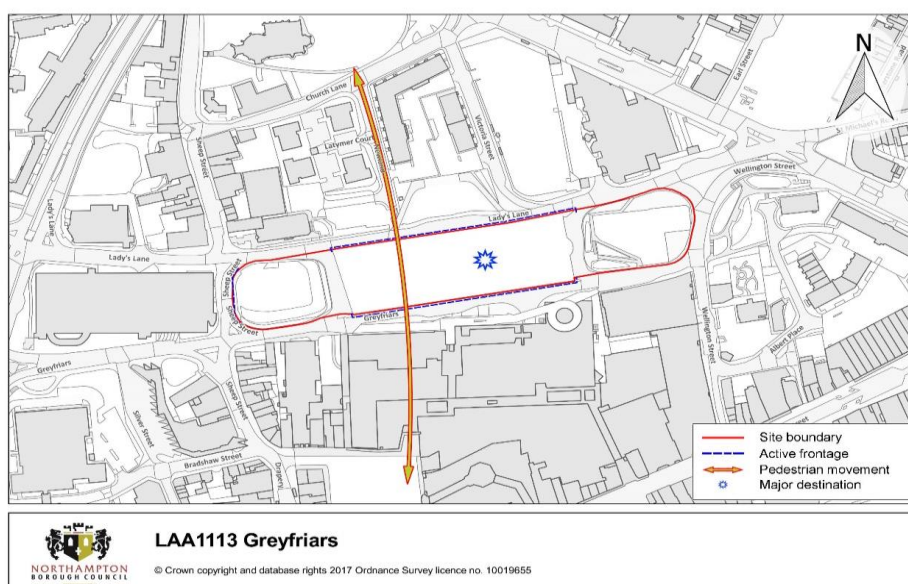
Any application must demonstrate how it will reduce surface water run-off in the surrounding area.

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 application must demonstrate how it will improve air quality in the surrounding area.

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**



e. 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, Becket's 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)**

Ransome Road will be developed for at least 200 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:

- 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
- 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

- 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
- Any development should not compromise the integrity of the habitat to the north-east of the site
- 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

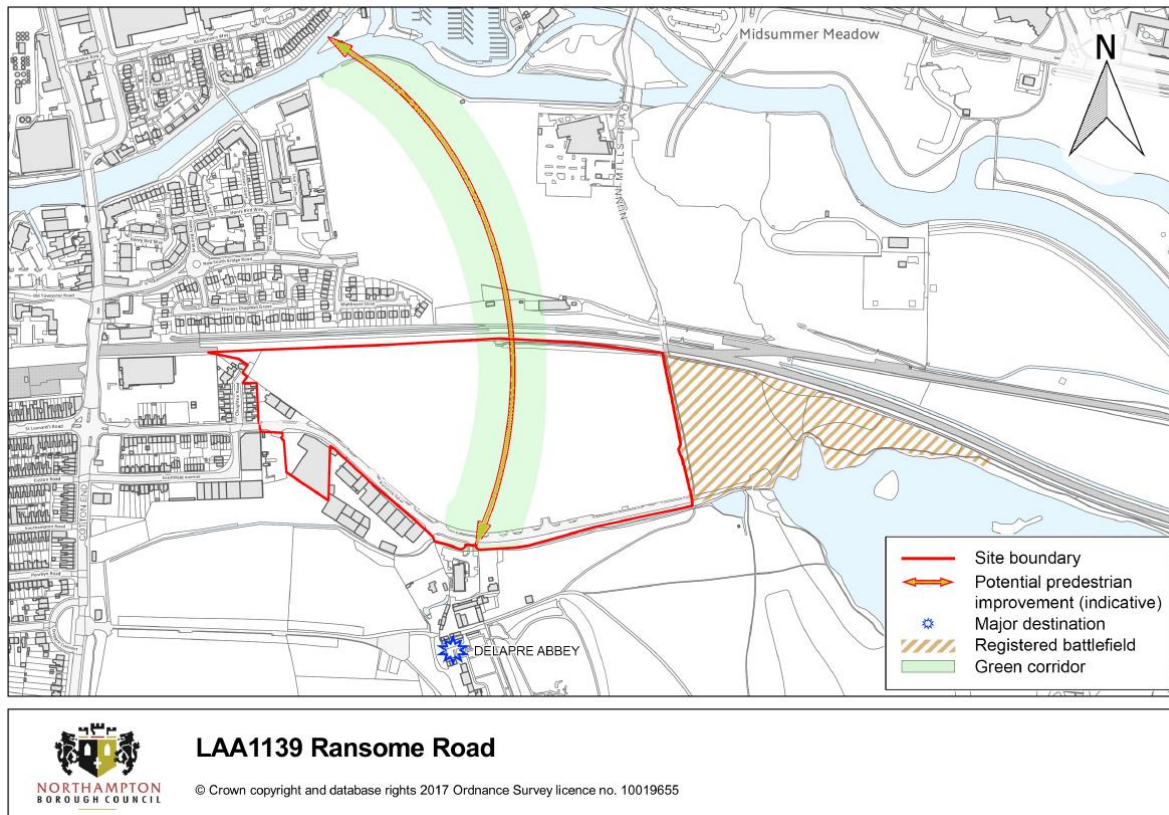
The layout of any development should be designed to take into account existing sewers and water mains within the site.

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.

Any development will be expected to contribute to provision of woodland and wet grass stepping stones (connected habitats).

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**



f. 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)

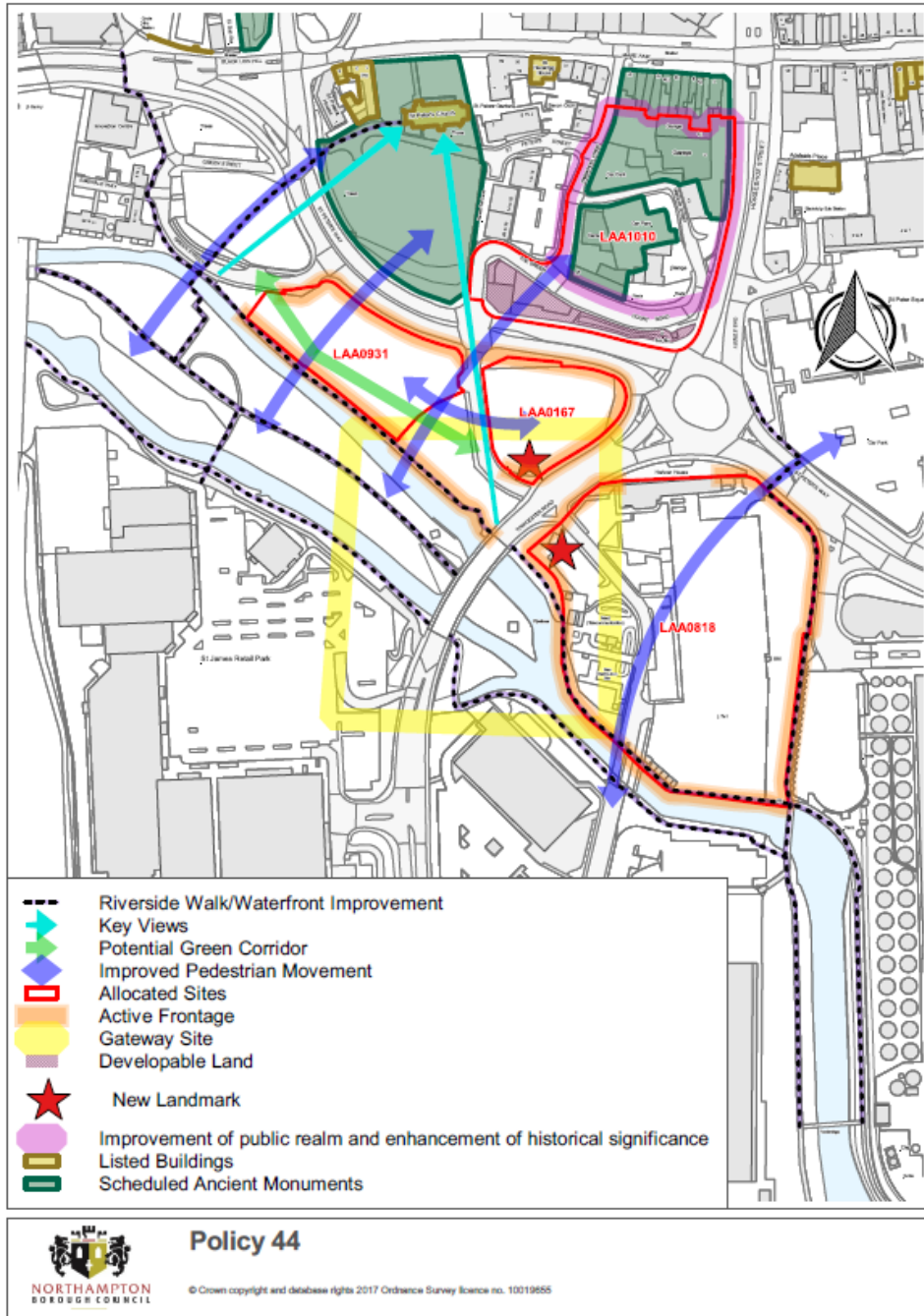
Any proposal that comes forward for any of these sites should be designed in an integrated manner, taking into consideration the impacts on each of these sites, the impacts on the heritage assets within the sites and the impacts on the setting of the heritage assets within the vicinity of these sites. 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:

- 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.
- 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.
- 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 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.

Any proposal forwarded for these sites should be accompanied by a site-specific Flood Risk Assessment.

FIGURE 23
DEVELOPMENT PRINCIPLES FOR SITES IN TANNER STREET, GREEN
STREET, ST PETER'S WAY AND FREESCHOOL STREET
(LAA0167/ 0818/ 0931/ 1010)



CHAPTER 14 IMPLEMENTATION AND MONITORING FRAMEWORK

a. 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

b. 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.

c. 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).

d. 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 plan is the key element in delivering the spatial vision and strategic objectives for 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 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.

e. 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
Building for life - 100% of new residential development to achieve Built for Life Certification	Applies to all residential development	2	3, 4	SA4, SA5, SA11	LPA (DM) / NCC / Developers	Where relevant permissions granted contrary to 'Built for Life' Panel	Consider barriers to implementation. Further discussions with developers.
Space standards –	Applies to all residential	3	6	SA1, SA2, SA8	LPA (DM) / NCC /	>10% of development	Consider barriers to

100% of residential should provide at least the minimum space standards as set out in Nationally Described Space Standards	development				Developers	fails to achieve standard	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

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	Delivery of housing in accordance with the housing	13, 41, 42, 43, 44		SA1	Developers – liaise on individual site trajectories. Monitoring data	Annual monitoring of planning permissions and trajectories	Review trajectories if necessary. Identify barriers

13, 41, 42, 43, 44	trajectory				from DM and West Northamptonshire Joint Planning Unit	show +/- 25% of predicted rate of delivery over a 3 year rolling period.	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 15% 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
- Gross AH completions

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 and delivery of new employment sites in accordance with identified demand that is sustainably located	17	18	SA6	LPA / developers / business owners	Loss of safeguarded employment land without justification. No new net employment floorspace within 5 years of LPP2 adoption	Consider barriers to implementation. Review evidence and consider policy review.
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.

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 community facilities, sports facilities, playing pitches and public open space	Meet standards 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	Identify barriers to implementation with developers. Consider evidence and potentially review policy.

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.
<p>Note: The following is monitored via the West Northamptonshire Joint Core Strategy Monitoring Framework (Pg 272 -273):</p> <ul style="list-style-type: none"> • 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 5% per year	6	20	SA8	PHE / NCC	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	Enhancements to already implemented scheme	10		SA6	University of Northampton / LPA	No delivery of enhancements 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

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 infrastructure and supporting the creation of new green infrastructure	Housing developments of 15 or more dwellings to deliver or contribute to projects identified in Northampton Green Infrastructure Plan	27	28	SA9	Developers / LPA / NCC	No new Green Infrastructure projects delivered within 5 years of adoption of LPP2	Consider barriers to implementation. Consider DM practices. Consider review of policy

Development on different types of open space	Development on land identified as surplus in the Open space, sport and recreation study	27	28, 29	SA10	LPA / planning policy	Development on land that has been identified as having a deficit of open space.	Consider why this is happening with DM. Review evidence.
Biodiversity net gain	Major developments must offset and secure a net gain in biodiversity	29	27	SA9	Developers / LPA	Loss of biodiversity	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	Delivery of sustainable schemes identified in Policy 34 and aligned to Policy 32	32, 34	2, 5	SA2, SA3, SA4	Developers / LPA / NCC	No progress towards delivery of new schemes within 5 years of adoption of LPP2	Consider barriers to implementation. Consider review of CIL

Progress towards NCC's modal shift objectives as set out in Policy 32	5% reduction in share of private care 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	<p>Travel to work surveys to understand why modal shift is not happening.</p> <p>Review Travel Plans and why they are not being implemented. Understand barriers such as suitable infrastructure / services to allow for modal shift.</p>
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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:							
<ul style="list-style-type: none"> • 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	All units in major development will be required to demonstrate how they are	5	3	SA8, SA12, SA13, SA16	Developers / LPA (development management)	Low adoption of measures identified through granted major planning	Identify barriers to delivery with developers and DM. Consider whether viability is an

	increasing efficiency in line with policy 5					applications	issue.
Development is accordance with Policy 7 (Flood risk and water management)	No applications granted contrary to flood management documents referenced in Policy 7	7		SA14	Developers / LPA DM / planning policy	Permissions granted contrary to advice.	Discussions with partner organisations, developers and DM.
Increase in number of electric-vehicle charging points	All new dwellings in residential major development should have EVCPs	35	5	SA8, SA12	Developers / LPA / NCC	No annual increase in EVCP installations	Discuss barriers to delivery such as viability, utility network capacity
Parking standards	To meet Northampton car and cycle parking and standards	35	4	SA12	Developers / NCC / LPA	Planning applications which exceed car parking standards and fail to provide suitable and safe cycle parking.	Discussions with DM and developers to reduce occurrences.

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	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 Built 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 that 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).

b) 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 center 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.

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.

Habitat 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).

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.

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.

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	T
0168	Rowtree Road	131	5	10	10	10	15	15	15	15	15	21	131
0171	Quinton Road	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, Hardingstone	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
0338	Countess Road 5YHLS (64) Additional capacity 4	68 (64 in HLS)		4									4

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
0403	Allotments, Studland Road	23		11	12								23
0629	British Timken 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, Harlestone Road	35			11	12	12						35
0720	Ryland Soans Garage, Harlestone Road	62			20	21	21						62
0767	Spencer Street	25 (HLS)											
0903	Hawkins Shoe Factory, Overstone Road	105 (HLS)											0
0910	379 Harlestone Road	14				7	7						14
0932	Southbridge Site 1	44 (HLS)						15	15	14			44
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 Wootton Road	22				11	11						22

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
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
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

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
1049	Land off Arbour Court, Thorplands garage block (exclude woodland)	11				5	6						11
1051 a	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 Oat 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
1086 a	2 parcels of land in Sunnyside Estate (Cosgrove Road)	6				3	3						6
1086 b	2 parcels of land in Sunnyside Estate (Chalcombe Road)	7				3	4						7
1094	Land off Holmecross 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

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
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 of Rushmere Road	125		25	30	30	30	10					125
1108	Horsley Road	35		15	20								35
1109	Mill Lane	6 (HLS)											0
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

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
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	Wootton	74			25	25	24						74
1138	Land South of Old Bedford Road	7			7								7
1139	Merge Homes England plots in Ransome Road	200 (HLS)											0
1140	Land north of Milton Ham	224		25	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

APPENDIX B
SUPERSEDED POLICIES

a. 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	2 / 3	Placemaking / 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 / 3	Placemaking / Design
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 / Design
E30	Shop front: external security protection	2 / 3	Placemaking / Design
E35	Advertisements: in conservation areas	31	Protection and enhancements of designated and non-designated heritage assets
E36	Advertisement hoardings: express consent	3	Design
H10	Other housing development: backland development	2 / 3	Placemaking / Design
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 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 / Design / Amenity and Layout
H21	Conversion to flats	2 / 3 / 4	Placemaking / Design / Amenity and Layout
H23	Conversion to flats	2 / 3 / 4	Placemaking / Design / Amenity and Layout
H24	Conversion to flats	2 / 3 / 4	Placemaking / 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
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 / Design
B8	Northampton Cattlemarket	17	Safeguarding Existing Employment Sites
B9	Pineham and Milton Ham: landscaping zone	2 / 3	Placemaking / Design
B10	Pineham and Milton Ham	17	Safeguarding Existing Employment Sites
B11	Milton Ham: height considerations	2 / 3	Placemaking / Design
B14	Development for non-business uses in business areas	2 / 3	Placemaking / 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 / 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 / Design
B32	Environmental impact of business development: amelioration	2 / 3	Placemaking / Design
B33	Environmental impact of business development: hazardous development	2 / 3	Placemaking / 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 / 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 disability	2 / 3 / 4	Placemaking / 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 / 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	Alternative 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		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		Not required. Part of site now developed.

	public house/ hotel		
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

b. 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 / Design / Amenity and Layout
2	Tall buildings	2 / 3 / 4	Placemaking / Design / Amenity and Layout

3	Public realm	2 / 3 / 4	Placemaking / 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 / 18	Safeguarding Existing Employment Sites / 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	38 / 42	Development Allocations / Greyfriars
18	Abington Street East	12 / 19	Development of main town centre uses / New Retail Developments and Retail Impact Assessment
19	Castle Station		Policy implemented
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	38	Development Allocations
24	Spring Boroughs		Not required. The site is covered by Spring Boroughs Neighbourhood Plan (made 2016)
25	The Waterside	38	Development Allocations
26	The Waterside: Brampton Branch St Peter's Way	38	Development Allocations
27	The Waterside: Southbridge West	38	Mostly developed. Remaining sites covered by Development Allocations
28	The Waterside: Avon / Nunn Mills / Ransome Road		Policy implemented
29	The Waterside: Becket's Park	38 / 27 / 28	Development Allocations / 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	38	Development Allocations

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

APPENDIX C

NORTHAMPTON INFRASTRUCTURE REQUIREMENTS

i. 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 pursues 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/HE	2019 Start	£12.24m	Developer
T2/ T3	Northampton (West)	North West Relief Road (A428 to A5199)	Northampton Kings Heath / Northampton West	Developer/NCC	2020 Start, 2022 complete	£35m	Developer/ SEMLEP/ 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/Grant Funded
T7	Northampton (West)	Kingsthorpe Corridor Improvements	Northampton (West)	NCC	2017 Start	£2.2m	NCC/ Developer/ Grant Funded
T9	NRDA	Plough Junction Improvements	Northampton St John's Area	NCC	Not known	£3m	Grant Funded
T12	NRDA	Bedford Road Bus Priority Improvements	Town Centre	NCC	Not known	£2.2m	NCC/ Developer
T13	NRDA	Wellingborough Road Bus Improvements	Northampton	NCC	Not known	£1.4m	NCC
T14	NRDA	Inter Urban Bus Service Improvement	Northampton	NCC	2010 ongoing	£1.2m	NCC
T15	NRDA	Cycle and Walking Routes, and Crossing	Northampton	NCC/ Sustrans	2010 ongoing	£14m	NCC/ Sustrans/ Developer
T16 b	Northampton (North)	A43 Corridor Improvements: Phase 1 b – Round Spinney to Moulton roundabout	Northampton North SUE	NCC	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	2020 - 21	£20m	SEMLEP/ Developer/ NCC
T18	Northampton (North)	Local Multi Modal Interchange and Bus Route Improvement/Provision	Northampton North SUE	NCC	2015 ongoing	£2m	Developer
T19	Northampton (North)	Kettering Road Bus Priority	Northampton North SUE	NCC	2020 start	£1.5m	Developer/NCC/ Grant funded
T20	Northampton (North)	Walking and Cycling Improvement	Northampton North SUE	NCC	Not known	£0.34m	Developer
T21	Northampton (West)	Potential Junction Provision/ Improvements	Northampton West SUE	NCC	2020 start	Not known	Developer
T22	Northampton (West)	Bus Route Improvement	Northampton West SUE	NCC	2020 start	£1.8m	Developer
T23	Northampton (West)	Walking and Cycling Improvement	Northampton West SUE	NCC	Not known	£0.23m	Developer
T24	Northampton	Towcester Road Bus	Northampton	NCC	2019	£0.12m	Developer/

Ref	Growth Location	Infrastructure Requirement	Required for Growth at	Delivery Body	Broad Phasing	Cost Est.	Funding Sources
	(South)	Priority related to Northampton South	South SUE		start		NCC
T25	Northampton (South)	Bus Route Improvement related to Northampton South	Northampton South SUE	NCC	Not known	£1.4m	Developer
T26	Northampton (South)	Walking and Cycling Improvement	Northampton South SUE	NCC	2019 start	£0.5m	Developer
T27	Northampton (South)	London Road Bus Priority	Northampton South of Brackmills SUE	NCC	2019 start	£2.7m	Developer/ NCC
T28	Northampton (South)	Bus Route Improvement	Northampton South of Brackmills SUE	NCC	2019 start	£1m	Developer
T29	Northampton (South)	Walking and Cycling Improvement	Northampton South of Brackmills SUE	NCC	2019 start	£0.5m	Developer
T30	Northampton (West)	Harlestone Road/Mill Lane Junction Improvements	Northampton Kings Heath SUE	NCC	2019 start	£3.7m	Developer
T31	Northampton (West)	Dallington to Kings Heath Road Improvements	Northampton Kings Heath SUE	NCC	2019 start	£3.6m	Developer
T32	Northampton (West)	Bus Route Improvement	Northampton Kings Heath SUE	NCC	2019 start	£4.3m	Developer
T33	Northampton (West)	Walking and Cycling Improvement	Northampton Kings Heath SUE	NCC	2019 start	£0.9m	Developer
T34	Northampton (North West)	Bus Route Improvement	Northampton North of Whitehills SUE	NCC	2019 start	£1.6m	Developer
T35	Northampton (North West)	Walking and Cycling Improvement	Northampton North of Whitehills SUE	NCC	2018 start	£2m	Developer
T36	Northampton (South)	Bus Route Improvement	Northampton Upton Park SUE	NCC	2019 start	£1.5m	Developer
T37	Northampton (South)	Walking and Cycling Improvement	Northampton Upton Park SUE	NCC	2019++2 start	£0.2m	Developer
T64	NRDA	Spencer Bridge Road Corridor Improvements	Wider Area	NCC	Not known	£3.5m	Not known
T66	NRDA	St James Mill Link Road	Northampton Waterside Enterprise Zone	NBC	2018 start	£2m	NBC/SEML EP
Sub Total NRDA Transport Infrastructure Known Costs						£155.47	

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	2022	£8m	NCC/ Developer
E3b	Northampton	One two form entry Primary School at Upton Lodge	Upton Lodge	NCC	2022	£6.5m	NCC/ Developer
E5	Northampton NRDA	New two form entry Primary School at Northampton South SUE	Northampton South SUE	NCC	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	2021	£7m	NCC/ Developer
E7	Northampton NRDA	Two x new two form entry Primary Schools at Northampton Kings Heath SUE	Northampton Kings Heath SUE	NCC	1 st by 2020	£14m	NCC/ Developer
E8	Northampton NRDA	New two form entry Primary School at Northampton Upton Park SUE	Northampton Upton Park SUE	NCC	2022	£7m	NCC/ Developer
E9	Northampton NRDA	New two form entry Primary School at Northampton North of Whitehills SUE	Northampton North of Whitehills SUE	NCC	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	1 st by 2021/2	£15m	NCC/ Developer
E11	Northampton NRDA	Two new two form entry Primary Schools at Northampton West SUE	Northampton West SUE	NCC	2022	£14m	NCC/ 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	2022 onwards	£30m	NCC/ Developer
E30	Northampton NRDA	New eight to ten form entry Secondary School to serve the South of Northampton	Northampton	NCC	2021	£10m	NCC/ Developer
E33	Northampton NRDA	Extensions to existing Schools in the Northampton Town Centre area totalling three forms of entry.	Northampton	NCC	2018/19	£8m	NCC/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	2020 onwards	£30m	NCC/ Developer
E40	Northampton NRDA	New eight to ten form entry Secondary School in the West of Northampton (Upton area)	Northampton	NCC	Post 2020	£30m	NCC/ Developer



NORTHAMPTON
BOROUGH COUNCIL

**NORTHAMPTON LOCAL PLAN PART 2
PROPOSED SUBMISSION ROUND 2 CONSULTATION
REGULATION 19**

SUMMARY OF REPRESENTATIONS
December 2020

Representation reference: 35/1/1 Name: Historic England	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective - not consistent with national policy	Comments: Thank you for providing the Heritage Impact Assessment and the amendments to the policies, it is considered that our comments can be addressed by Statement of Common Ground.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 62/1/11 Name: Northamptonshire County Council / North Northants JPU	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: General. We note that there are a number of other policies that can significantly contribute to health and wellbeing and we support their inclusion and effective implementation, recognising the contribution they can make to health and wellbeing, notably policies on; <ul style="list-style-type: none"> • Placemaking • Design • Neighbourhood centres • Sports facilities and playing pitches • Community facilities • Green infrastructure • Open spaces 	Suggested changes: None.	Officer comments: Noted.
Representation reference: 97/1/3 Name: Clayson Country Homes	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: At the outset, our client commends the efforts of the Borough Council up to this point in progressing their Part 2 Local Plan, particularly in light of the acute housing land supply issues which are faced within the Borough and the significant threat to housing delivery which the ongoing COVID 19 pandemic continues to have.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 97/1/4	Refers to: The Plan	Legal compliance and soundness:	Comments: It is refreshing to learn that the Borough Council are continuing to expedite the production of the Part 2 Local Plan and the	Suggested changes: None.	Officer comments: Noted.

<p>Name: Clayson Country Homes</p>		<p>Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>following comments are framed against the current macro-economic climate, the challenges faced by the aforementioned pandemic and the changes which the organisation faces as it moves towards unitary status along with Daventry and South Northants Districts.</p> <p>The following are set out in order of appearance within the consultation document and do not seek to provide and exhaustive appraisal of the emerging DPD but rather responds to those pertinent points relevant to the respondent's landholding;</p> <p>It is agreed that an important challenge for Northampton, which the emerging LPP2 should seek to meet, is that of housing delivery for all tenures. The document's acknowledgement of the challenges posed by the dense built form within the legislative boundary of Northampton is welcomed and only serves to highlight the significant opportunity which greenfield sites, such as the client's, offer to meeting the existing and future development needs of the Borough.</p> <p>Furthermore, whilst there has been a historic under delivery of housing within the plan area since 2011, this has been further compounded in 2020 whereby almost two quarters of anticipated delivery has been lost due to the aforementioned ongoing global health crisis.</p>		
<p>Representation reference: 97/1/23</p> <p>Name: Clayson Country Homes</p>	<p>Refers to: The Plan</p>	<p>Legal compliance and soundness:</p> <p>Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments:</p> <p>It is considered that the document has been positively prepared with the objective to contribute towards the achievement of sustainable development. Whilst the above commentary has highlighted where elements of the document are ambiguous and unnecessarily duplicate provisions which are made elsewhere within the development plan or Framework, it remains the respondent's opinion that the document (subject to the above) is 'sound'.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

Representation reference: 97/1/26 Name: Clayson Country Homes	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Notwithstanding the points raised above, the client is in agreement that the LPP2 presents the most suitable strategy, when assessed against the reasonable alternatives, which is both deliverable and consistent with national policy. Therefore, against the backdrop of our client's land and property interests, the LPP2 is considered both legally compliant and sound in its content.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 144/1/3 Name: Daventry District Council	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The progress being made on the preparation of the Northampton Part 2 Local Plan is welcomed by Daventry District Council The two issues identified at the first submission stage by Daventry District Council, relating to policy 24 (Open Space) and Gypsies and travellers, have been satisfactorily addressed and this is welcomed. In Daventry District Council's view, there are no duty to co-operate or legal compliance issues.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 148/1/4 Name: St Clair Land and Developments LLP	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Our client commends the efforts of the Borough Council up to this point in progressing their Part 2 Local Plan, particularly in light of the acute housing land supply issues which are faced within the Borough and the significant threat to strategic development of all types which the ongoing COVID 19 pandemic continues to have.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 148/1/5 Name: St Clair Land and Developments LLP	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: It is refreshing to learn that the Borough Council are continuing to expedite the production of the Part 2 Local Plan and the following comments are framed against the current macro-economic climate, the challenges faced by the aforementioned pandemic and the changes which the organisation faces as it moves towards unitary status along with Daventry and South Northants Districts	Suggested changes: None.	Officer comments: Noted.

<p>Representation reference: 148/1/21</p> <p>Name: St Clair Land and Developments LLP</p>	<p>Refers to: The Plan</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: It is considered that the document has been positively prepared with the objective to contribute towards the achievement of sustainable development. Whilst the above commentary has highlighted where elements of the document are ambiguous and unnecessarily duplicate provisions which are made elsewhere within the development plan or Framework, it remains the respondent's opinion that the document (subject to the above) is 'sound'.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 195/1/3</p> <p>Name: Mr B Cheer</p>	<p>Refers to: The Plan</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: At the outset, our client commends the efforts of the Borough Council up to this point in progressing their Part 2 Local Plan, particularly in light of the acute housing land supply issues which are faced within the Borough and the significant threat to housing delivery which the ongoing COVID 19 pandemic continues to cause.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 195/1/4</p> <p>Name: Mr B Cheer</p>	<p>Refers to: The Plan</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: It is refreshing to learn that the Borough Council are continuing to expedite the production of the Part 2 Local Plan and the following comments are framed against the current macro-economic climate, the challenges faced by the aforementioned pandemic and the changes which the organisation faces as it moves towards unitary status along with Daventry and South Northants District.</p> <p>The following are set out in order of appearance within the plan and do not seek to provide wholesale commentary in respect of the document but rather responds to those points relevant to the respondent's landholding;</p> <p>It is agreed that an important challenge for Northampton, which the emerging LPP2 should seek to meet, is that of housing delivery for all tenures. The documents</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			<p>acknowledgement of the challenges posed by the dense built form within the legislative boundary of Northampton is welcomed and only serves to highlight the significant opportunity which greenfield sites, such as the client's, offer to meeting the future development needs of the Borough.</p> <p>Furthermore, whilst there has been a historic under delivery of housing within the plan area since 2011, this has been further compounded in 2020 whereby almost two quarters of anticipated delivery has been stalled due to the ongoing global health crisis.</p>		
<p>Representation reference: 195/1/21</p> <p>Name: Mr B Cheer</p>	<p>Refers to: The Plan</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: It is considered that the document has been positively prepared with the objective to contribute towards the achievement of sustainable development. Whilst the above commentary has highlighted where elements of the document are ambiguous and unnecessarily duplicate provisions which are made elsewhere within the development plan or Framework, it remains the respondent's opinion that the document (subject to the above) is 'sound'.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 195/1/25</p> <p>Name: Mr B Cheer</p>	<p>Refers to: The Plan</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Notwithstanding the points raised above, the client is in agreement that the LP2 presents the most suitable strategy, when assessed against the reasonable alternatives, which is both deliverable and consistent with national policy. Therefore, against the backdrop of our client's land and property interests, the LP2 is considered both legally compliant and sound in its content.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 197/1/3</p> <p>Name:</p>	<p>Refers to: The Plan</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p>	<p>Comments: Northamptonshire County Council's Development Infrastructure and Funding and Growth team welcomes the opportunity to comment on the Draft Northampton Local Plan Part 2 (the Draft Plan) through the current Regulation 19</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

Northamptonshire County Council		Soundness: - not specified	(Round 2) consultation, supporting the development of planning policy at the local level. The comments contained within this response are supplementary to an earlier response, submitted in relation to the Round 1 consultation during June 2019, and should therefore be read in conjunction with our previous response.		
Representation reference: 197/1/24 Name: Northamptonshire County Council	Refers to: The Plan	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: 21. The County Council welcomes the approach adopted by Northampton Borough Council in preparing the Draft, which builds on the adopted West Northamptonshire Joint Core Strategy and positively supports the need for collaboration between local authorities and other partner organisations, to ensure that the 'duty to co-operate' obligation is met – particularly in relation to those areas of the borough allocated as Sustainable Urban Extensions (SUEs) and at other strategic housing sites including those in the Northampton Related Development Area.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 201/1/17 Name: Persimmon Homes	Refers to: The Plan and policies map	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: Along with David Wilson Homes, Persimmon Homes controls the Dallington Grange Sustainable Urban Extension (SUE), which is allocated for development in the adopted West Northamptonshire Joint Core Strategy, 2014 (JCS). An outline planning application for the SUE has achieved resolution to grant planning permission and it is anticipated that the Section 106 agreement will be finalised shortly.	Suggested changes: We would reiterate our earlier comments that it would be helpful for both decision-makers and stakeholders if the proposals map associated with the Part 2 Plan illustrated the committed SUEs around Northampton rather than these	Officer comments: The Local Plan Part 2 relates to Northampton's borough boundary. The SUEs are shown in the West Northamptonshire Joint Core Strategy (Local Plan Part 1).

				simply being shown as "white land."	
Representation reference: 217/1/1 Name: National Grid	Refers to: The Plan	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: No comments.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 218/1/1 Name: Danelaw Real Estate	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Considers the plan to be legally compliant and sound.	Suggested changes: None	Officer comments: Noted.
Representation reference: 225/1/1 Name: Anthony Smith	Refers to: The Plan	Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements - not compliant with duty to cooperate	Comments: With the proposed increase in housing from 300 to 1100 houses Great Houghton would have a serious traffic problem. There is already a dangerous traffic problem with parked cars in the High Street for drivers to navigate. The junction with High Street and the Bedford Road is also very dangerous with no roundabout. The dramatic increase in traffic would be unsustainable through the village and would also create rabbit runs such as along Willow Lane. There are no facilities such as shop, school, bus route in the village which would mean driving to these facilities essential. There is only the village hall and playing field amenities which would be under increased pressure with such an increase in population. The very complicated means for village inhabitants to object to this plan (ie our email was rejected) has probably contributed to many not being able to object who would have wanted to.	Suggested changes: None.	Officer comments: The Council has undertaken a robust land availability assessment, as well as commissioned a detailed Heritage Impact Assessment and traffic modelling exercises. These assessments conclude that the development can be mitigated against and Policy 41 has been formulated to guide developers accordingly.

<p>Representation reference: 225/1/2</p> <p>Name: Anthony Smith</p>	<p>Refers to: The Plan</p>	<p>Legal compliance and soundness: Plan is not legally compliant:</p> <p>Plan is unsound: - not positively prepared - not justified</p>	<p>Comments: The impact of this massive increase in housing to our quiet village will be very damaging. The congestion, noise and pollution of the increased traffic must be investigated. The safety of pedestrians, cyclists and traffic on already dangerous roads and junctions must be investigated. The lack of facilities ie school, shop, bus route, leisure centre must be investigated.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The Council has undertaken a robust land availability assessment, as well as commissioned a detailed Heritage Impact Assessment and traffic modelling exercises. These assessments conclude that the development can be mitigated against and Policy 41 has been formulated to guide developers accordingly.</p>
<p>Representation reference: 228/1/1</p> <p>Name: David Russell</p>	<p>Refers to: The Plan</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - reason not specified</p>	<p>Comments: The respondent indicated that the Plan was not legally compliant but gave no reason.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 238/1/3</p> <p>Name: West Hunsbury Parish Council</p>	<p>Refers to: The Plan and policies map</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: This objection concerns the failure of Local Plan Part 2 to allocate land as Amenity Green Space at the south of the wider Ladybridge Park/Wootton Brook Park open space (Map 1). This southernmost area comprises a multi-functional use area that is used for football pitches and various forms of informal recreation – such as walking, dog walking, picnics, informal sports and games.</p>	<p>Suggested changes: Allocate Welland Valley FC as amenity green space.</p>	<p>Officer comments: It is agreed that the evidence provided is sufficient to conclude that this site should be designated as an amenity green space. It is also noted that in the</p>

			<ul style="list-style-type: none"> • The unallocated playing pitches are contiguous and used as one amenity area with the wider Ladybridge Park land to the north and east of the site • The more informal open space areas at Ladybridge/Wootton Brook Park, to the north and east of the objection site, are allocated as Amenity Green Space and benefit from the protection afforded to such land by Policy 28 of Local Plan Part 2. • There is clear and unambiguous evidence that the playing pitches have had continuous use as local amenity space and playing fields. The land was allocated as such in the 1997 Local Plan under Policy E6, Map 2 • Part of the playing pitch site had originally been laid out as a cricket pitch before becoming ad hoc football pitches. This use was then formalised when the land was leased by Northampton Borough Council to Welland Valley Football Club (WVFC) who have improved the quality of the pitches. WVFC have been at this site since 2002. • By failing to protect the playing pitch/informal recreation area under Policy 28 is contrary to paragraph 97 of national planning policy • Sports pitches shown in figures 10, 11 and 12 of Part 3 of the Playing Pitch Strategy 		1997 Local Plan, the site had been allocated as greenspace. Modify the Policies Map and designate this area as amenity green space.
Representation reference: 244/1/5 Name: Bastion Group	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The comments on the Plan and proposed changes requested as set out in these representations are limited in their nature, scale and extent but would ensure the Plan remains 'effective', 'justified' and 'consistent with national policy'. The changes are required to reinforce the overall general soundness of the Plan, which is vital to ensure that NBC can meet its objectively assessed housing need requirement, support economic growth and maintain its wider advantageous position in the Oxford to Cambridge Arc.	Suggested changes: None.	Officer comments: Noted.

Representation reference: 248/1/2 Name: Welland Valley Rail	Refers to: The Plan	Legal compliance and soundness: Plan is unsound: - not effective	Comments: There are a number of improvements to the effectiveness in attached document. (which detail paragraph numbers).	Suggested changes: See comments.	Officer comments: Noted.
Representation reference: 250/1/24 Name: St Clair Land and Developments LLP Old Bedford Road	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Whilst it is considered that whilst the document would benefit from revisions as set out above, the document does present a plan led approach to meeting those issues which are faced within the Borough. Given the acute housing needs issues faced in the area in recent years, it is considered that the emerging development plan document provides a positive vision and outlines a bold approach and framework to meeting both housing needs and other economic, social and environmental priorities.	Suggested changes: None.	Officer comments: Welcomed.
Representation reference: 250/1/25 Name: St Clair Land and Developments LLP Old Bedford Road	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: It is considered that the document has been positively prepared with the objective to contribute towards the achievement of sustainable development. Whilst the above commentary has highlighted where elements of the document are ambiguous and unnecessarily duplicate provisions which are made elsewhere within the development plan or Framework, it remains the respondent's opinion that the document (subject to the above) is 'sound'.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 250/1/30 Name: St Clair Land and Developments LLP Old Bedford Road	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Notwithstanding the points raised above, the client is in agreement that the LPP2 presents the most suitable strategy, when assessed against the reasonable alternatives, which is both deliverable and consistent with national policy. Therefore, against the backdrop of our client's land and property interests, the LPP2 is considered both legally compliant and sound in its content.	Suggested changes: None.	Officer comments: Noted.

<p>Representation reference: 251/1/2</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: The Plan</p>	<p>Legal compliance and soundness:</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: Please see enclosed representations for justification of objection to the soundness of the Plan.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 229/1/2</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: para. 1.1</p>	<p>Legal compliance and soundness:</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Paragraph 1.10 contains an error in so far so there is actually no legal duty to co-operate under the Local Act 2011 to consult with the Local Enterprise Partnership. The Town and County Planning (Local Planning England 2012) as amended, does not place a duty to co-operate with the LEPs and Local Nature Partnerships. Only regard must be had to their activities when preparing local plans, so long as their activities are relevant to plan-making.</p> <p>Paragraph 1.13 states that the Statement of Common Ground (SOC) will be made prepared alongside the version of the Local Plan to be submitted to the Secretary of State. The NPPF states in paragraph 27, "in order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statement of common ground, documentation the cross boundary matters being addressed and progress in co-operating to address these. These should be produced using the approach set out in National Planning Guidance and be made publicly available through the plan-making process to provide transparency." The National Planning Practice Guidance states that "Authorities should have made a statement of common ground available on their website by the time they publish their draft plan, in order to provide communities and other Stakeholders with a transparent picture of how they have collaborated".</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The Localism Act 2011 introduced the Duty to Cooperate. The Town and Country Planning (Local Planning) (England) 2012 outlines the bodies prescribed for the purposes of meeting the legal duty to cooperate. Regulation 4 (2) sets out that Local Enterprise Partnerships should be involved in the DTC. This is outlined in Paragraph 1.11 of the LPP2. Paragraph 27 of the NPPF refers to strategic policies. The Northampton LPP2 does not</p>

			The plan by delaying the SOC, NBC are not demonstrating their statutory duty of co-operation on strategic matters.		contain strategic policies; strategic policies for Northampton are contained in the Part 1 Local Plan - the West Northamptonshire Joint Core Strategy.
<p>Representation reference: 229/1/3</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: para. 1.1</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Paragraph 1.1 does not refer to the review of the policies of the West Joint Core strategy Local Plan Part 1 (WNJCS) as required by Regulation 10A Town and Country (Local Planning) (England) Regulations 2012 (as amended), that was carried out in December 2019. As a result of the review, policies; SA,S3,S7,S11,C2,H2, H4,H6 and T5 required action, in order to conform with the NPPF 2019. In further representations, I raise concerns that the findings of the review have not been considered in this draft submission Local Plan Part 2. The draft plan, by virtue of being inconsistent with the review of the West Northants Joint Core Strategy findings, is therefore not consistent with national policy.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Include wording at para 1.1: and reviewed in December 2019 as set out in Regulation 10A Town and Country (Local Planning) (England) Regulations 2012 (as amended). Some policies within the West Northamptonshire Joint Core Strategy will be reviewed as a part of the West Northamptonshire Strategic Plan (WNSP) preparation. Where policies are out of date they are superseded by policies within the Northampton LPP2.</p>

					<p>* The WNJCS has its own SA policy which is in conformity with the NPPF, * Policy S3 should continue to be used for housing purposes and the LPP2 does this * Policy S7 Relates to employment evidence. Employment evidence for the WNSP will be reviewed. The LPP2 has its own up to date employment evidence * Policy S11 relates to low carbon and renewable energy and will be updated for the WNSP. The LPP2 contains policies in line with the latest Government guidance on reducing carbon emissions specifically in Policy 5 and throughout the LPP2 * Policy C2 Relates to connections in</p>
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					<p>relation to new developments. This will be updated for WNSP. The LPP2 contains detailed policy on sustainable transport and travel in Policy 32</p> <ul style="list-style-type: none">* Policy H2 AH will be reviewed but remain valid for LPP2s* Policy H4 (Sustainable housing) will be updated in WNSP as now out of date. The LPP2 contains up to date requirements for housing in Policies 3, 5 and 14* Policy H6 (Gypsies, Travellers and Travelling Showpeople) will be reviewed for WNSP. Policy 16 of the LPP2 supersedes this policy.* Policy T5 relates to Towcester Racecourse which is not a concern for
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					the Northampton LPP2
Representation reference: 200/1/3 Name: HBF	Refers to: Chapter 1 and general	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: It is the HBF's opinion that the Northampton LPP2 makes inadequate reference to its strategic context. The adopted WNJCS established an objectively assessed housing need (OAHN) of 25,758 dwellings for Northampton. For the plan period 2011 – 2029, the adopted WNJCS sets out in Policy S3 a housing requirement of about 18,870 dwellings for Northampton. As set out in Policy 4 of the adopted WNJCS the remainder of Northampton's housing need is met by Sustainable Urban Extensions (SUEs) in the Northampton Related Development Area (NRDA) for 5,750 dwellings in Daventry and 3,850 dwellings in South Northamptonshire. The housing requirement set out in the adopted WNJCS is a minimum.	Suggested changes: None specified.	Officer comments: Paragraph 1.1 sets out the policy context for the LPP2. Throughout the document the strategic context is continually referenced, including through the strategic objectives.
Representation reference: 200/1/4 Name: HBF	Refers to: Chapter 1 and general	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: The WNJCS was found sound on the basis that a review should be undertaken and adopted by 2020. It is proposed that the adopted WNJCS will be replaced by West Northamptonshire Strategic Plan (WNSP). The Joint Local Development Scheme (LDS) programmes Regulation 18 consultation in April 2019, Regulation 19 consultation in December 2020, submission for examination in April 2021, examination from September 2021 onwards and adoption by January 2022. The programmed adoption of the WNSP by January 2022 is 2 years later than the adoption date of 2020 for the review of the WNJCS on which the WNJCS was found sound. It is also noted that the Regulation 18 consultation was delayed until October rather than April 2019 so the preparation of the WNSP is already behind schedule. From December 2019 (5 years after adoption), the strategic policies including the OAHN / housing requirement in the adopted WNJCS should be considered out of date. There is	Suggested changes: None specified.	Officer comments: The Policies of the West Northamptonshire Joint Core Strategy were reviewed in December 2019 in line with Regulation 10A of the Town and Country (Local Planning) (England) Regulations 2012 (as amended). The proposed revised standard methodology for the calculation of housing has not yet been implemented.

			potentially a gap of at least 2 years before adoption of the WNSP whilst strategic policies of the adopted WNJCS should be considered out of date. Under the 2019 NPPF, the Council should have a 5 YHLS against either a housing requirement set out in an adopted Plan (2,367 dwellings per annum in adopted WNJCS) or an LHN (2,139 dwellings per annum) where strategic policies are more than 5 years old (para 73). If the Government's proposals for a revised standard methodology for the calculation of LHN are implemented, then the LHN for WN will increase to 2,645 dwellings per annum.		
<p>Representation reference: 229/1/1</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Chapter 1</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p>	<p>Comments: Paragraph 1.10 contains an error in so far so there is actually no legal duty to co-operate under the Local Act 2011 to consult with the Local Enterprise Partnership. The Town and County Planning (Local Planning England 2012) as amended, does not place a duty to co-operate with the LEPs and Local Nature Partnerships. Only regard must be had to their activities when preparing local plans, so long as their activities are relevant to plan-making.</p> <p>Paragraph 1.13 states that the Statement of Common Ground (SOC) will be made prepared alongside the version of the Local Plan to be submitted to the Secretary of State. The NPPF states in paragraph 27, "in order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statement of common ground, documentation the cross boundary matters being addressed and progress in co-operating to address these. These should be produced using the approach set out in National Planning Guidance and be made publicly available through the plan-making process to provide transparency." The National Planning Practice Guidance states that "Authorities should have made a statement of common ground available on their website by the time they publish their draft</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The Localism Act 2011 introduced the Duty to Cooperate. The Town and Country Planning (Local Planning) (England) 2012 outlines the bodies prescribed for the purposes of meeting the legal duty to cooperate. Regulation 4 (2) sets out that Local Enterprise Partnerships should be involved in the DTC. This is outlined in Paragraph 1.11 of the LPP2. Paragraph 27 of the NPPF refers to strategic policies. The Northampton</p>

			plan, in order to provide communities and other Stakeholders with a transparent picture of how they have collaborated". The plan by delaying the SOC, NBC are not demonstrating their statutory duty of co-operation on strategic matters.		LPP2 does not contain strategic policies; strategic policies for Northampton are contained in the Part 1 Local Plan - the West Northamptonshire Joint Core Strategy.
Representation reference: 243/1/3 Name: Lisa Dawson	Refers to: para. 1.18	Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI - not compliant with duty to cooperate Plan is unsound: - not justified - not effective	Comments: Within the 195 page document "Northampton Local Plan Part 2 2011-2029; Proposed Submission - Round 2 June 2020" (page 11) you state that "this is the first stage of the plan preparation process and consultation took place in May/June 2016. The public were consulted...." At NO point was any resident of Cosgrove Road and or Cosgrove Way made aware or any proposals to build on the area referred to as "The Green" until the Chronicle & Echo ran an article on the 13th July 2020 inviting residents to review a 200 page document. I would like it noted at this point, that a lot of residents are either elderly and/or disabled and many do not have access to Social Media. I do not think that the Council have met their legal obligation in notifying residents of the proposals.	Suggested changes: None specified.	Officer comments: The Council has undertaken consultations in accordance with the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 as modified. This includes making the documents available for inspection at a principal office and other places (such as libraries) during normal office hours; and published on the local authority website. The Council also advertised each stage of consultation within Local Newspapers.

					Full details of consultation at each stage of the LPP2's progress can be found in the Consultation Statement on the Council's website. The Council have met their full legal obligations regarding publicising the production of the LPP2.
Representation reference: 35/1/2 Name: Historic England	Refers to: para. 2.27	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Sound.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 250/1/19 Name: St Clair Land and Developments LLP Old Bedford Road	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The respondent welcomes the pragmatic approach taken by the Council within Policy 14 and is refreshed to learn of the flexible approach the Council have taken by not prescribing a housing mix based on the outputs of the Strategic Housing Market Assessment. This approach will allow for housing delivery to flexibly respond to changing housing requirements over time.	Suggested changes: However, in regard to self and custom build housing, whilst the requirements for such housing are justified, it is considered that the 3-year period (to allow for the reversion to other forms of housing)	Officer comments: It takes 3 years for a planning permission to be implemented. It is considered reasonable to allow the same time line to be applied to this requirement.

				should be reduced to 1 year to ensure that housing delivery is maintained.	
<p>Representation reference: 200/1/16</p> <p>Name: HBF</p>	<p>Refers to: Chapter 2</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: By 1st April 2019, 5,727 dwellings had been delivered against 8,157 dwellings in the housing trajectory of the adopted WNJCS resulting in an under-delivery of 2,430 dwellings (see Table 1). The Council cannot demonstrate a 5 YHLS between 2019/20 – 2023/24 against the housing trajectory set out in Appendix 3 of the adopted WNJCS, a 20% buffer for persistent under-delivery and a Sedgefield approach to recouping shortfalls. The 5 YHLS is calculated as only 3.13 years.</p> <p>The Council is proposing the application of a 5% buffer to the 5 YHLS calculation because of its 2019 Housing Delivery Test (HDT) results. The 5 YHLS between 2019/20 – 2023/24 using a 5% buffer and Sedgefield is calculated as 4.5 years. However, the Council should not be complacent in using a 5% buffer because the HDT is measured against the lowest denominator of either household projections or housing requirement.</p> <p>As the Council can still not demonstrate a 5 YHLS (only 4.5 years), a different housing trajectory to that set out in the adopted WNJCS is proposed. The Council proposes using Liverpool rather than Sedgefield approach to recouping shortfalls combined with a stepped trajectory. The stepped trajectory uses actual completions for 2011/12 – 2018/19, baseline of 981 dwellings between 2019/20 – 2023/24 and 1,609 dwellings between 2024/25 – 2028/29. This stepped trajectory backloads the meeting of housing needs. A Liverpool approach without any stepping is 1,295 dwellings per annum. This proposed change of housing trajectory irrespective of the Council's legal opinion is inconsistent with the adopted WNJCS. The use of a Liverpool approach and a stepped housing</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The Northampton Local Plan Part 2 is delivering the WNJCS. The Council's decision to amend the trajectory is in conformity to the adopted JCS. Para 5.40 of the JCS makes reference to the trajectory being updated annually as part of the Annual Monitoring Report. Para 5.41 states that although the trajectory will be reprofiled each year, the delivery will always be compared to the base trajectory. Flexibility exists within the Plan and housing trajectory that allows for development to be brought forward to mitigate the impact</p>

			trajectory represents a double deferral to the delivery of housing needs. This is not just a theoretical mathematical numbers exercise but households in need of homes, it is unacceptable to expect them to be continuously waiting until later in the plan period before their current housing needs are addressed. If the Council cannot demonstrate a 5 YHLS on adoption of the LPP2 and maintain a 5 YHLS throughout the remainder of the plan period then the LPP2 is unsound.		of delays on individual sites.
Representation reference: 200/1/5 Name: HBF	Refers to: Chapter 2 and general	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: WN is also now included within the Oxford – Milton Keynes – Cambridge Growth Arc, where a significant uplift in the delivery of new homes is envisaged by 2050. The Council should recognise economic benefits of such growth. The Economic Footprint of House Building in England & Wales Report commissioned by HBF estimates for every one additional house built, the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27,754 towards affordable housing, £806 towards education, £297 towards open space / leisure, £1,129 extra in Council tax and £26,339 spent in local shops.	Suggested changes: None specified.	Officer comments: The Oxford to Cambridge Arc, and Northampton's place within the Arc is referenced throughout the LPP2.
Representation reference: 35/1/3 Name: Historic England	Refers to: Chapter 2	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The respondent considered some elements of the plan to be sound, but not others. Recommendations were provided to improve the effectiveness of the plan. On this basis, it was considered that the respondent considers the plan to be unsound because it is not effective.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 248/1/3 Name: Welland Valley Rail	Refers to: para. 2.58	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective	Comments: It is extremely welcome to see a council considering new rail destinations, so often councils limit themselves to meekly asking for a couple of extra services on existing routes, so to see new destinations being both considered and route for them protected is extremely welcome.	Suggested changes: None.	Officer comments: Noted.

<p>Representation reference: 248/1/5</p> <p>Name: Welland Valley Rail</p>	<p>Refers to: para. 2.60</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not effective</p>	<p>Comments: 2.60 - It is also encouraging that the council is actively supporting the EEH projects to identify & provide these new destinations, which makes it disappointing that the most important corridor to satisfy the connectivity gaps identified by EEH (towards Wellingborough) is not on the maps in the local plan despite being mentioned in the supporting text.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: This was omitted in error. This is being recommended for inclusion in Policy 34 and the Policies Map as part of the minor modifications.</p>
<p>Representation reference: 248/1/6</p> <p>Name: Welland Valley Rail</p>	<p>Refers to: para. 2.60</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not effective</p>	<p>Comments: The EEH project has not progressed as far as identifying potential alignments - so we have, as detailed in this report. (pages 22-28)</p> <p>For this reason we suggest that the “Brackmills” corridor is in fact significantly more important to protect than Market Harborough. At a regional level a Leicester-Rugby connection may offer the same strategic benefits to Northampton (better access to East Midlands Airport & Leicester), alongside local freight benefits at Lutterworth, and be a higher priority option than a Northampton-Market Harborough connection, which would allow it's preservation in the current leisure use format for future use, which in turn makes protection of both “Brackmills” corridors even more crucial.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: This was an omission. Modify the Policies Map accordingly.</p>
<p>Representation reference: 97/1/22</p> <p>Name: Clayson Country Homes</p>	<p>Refers to: Chapter 3 and Vision</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In conclusion, whilst it is considered that whilst the document would benefit from revisions as set out above, the document does present a plan led approach to meeting those issues which are faced within the Borough. Given the acute housing needs issues faced in the area in recent years, it is considered that the emerging development plan document provides a positive vision and outlines a bold approach and framework to meeting both housing needs and other economic, social and environmental priorities.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

Representation reference: 148/1/8 Name: St Clair Land and Developments LLP	Refers to: Chapter 3 and Vision	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: It is key to the success of the LPP2 that the DPD helps to deliver the priorities set out in the Northampton Economic Growth Strategy 2020-2025 which was published in May 2020. The documents vision correctly identifies that by the end of the plan period Northampton will be the heart of West Northamptonshire and play a key role in the Oxford-Cambridge Arc Corridor. To this end, the respondents site will assist in the realisation of this vision.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 195/1/5 Name: Mr B Cheer	Refers to: Chapter 3 and Vision	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Therefore, the emerging LPP2 is required to be pragmatic in its response to housing needs and should serve to significantly boost supply as required by the content of the National Planning Policy Framework. To this end, the client welcomes the reference to housing delivery within the proposed vision on Page 32 and the accompanying strategic objectives, particularly Objective 2.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 148/1/9 Name: St Clair Land and Developments LLP	Refers to: Objective 4	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The objectives set out within the document are supported, particularly Objective 4 which seeks to capitalise on existing economic contributors and to strengthen and diversify the economy through taking advantage of Northampton's internationally well- placed location. The respondent's site is key to this objective in its proximity to the A45 and M1.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 250/1/7 Name: St Clair Land and Developments LLP Old Bedford Road	Refers to: Objective 2	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The emerging LPP2 is required to be pragmatic in its response to housing needs and should serve to significantly boost supply as required by the content of the National Planning Policy Framework. To this end, the client welcomes the reference to housing delivery within the proposed vision on Page 32 and the accompanying strategic objectives, particularly Objective 2.	Suggested changes: None.	Officer comments: Noted.

<p>Representation reference: 97/1/5</p> <p>Name: Clayson Country Homes</p>	<p>Refers to: Objective 2</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: Therefore, the emerging LPP2 is required to be pragmatic in its response to housing needs and should serve to significantly boost supply as required by the content of the National Planning Policy Framework. To this end, the client welcomes the reference to housing delivery within the proposed vision on Page 32 and the accompanying strategic objectives, particularly Objective 2.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 62/1/3</p> <p>Name: Northamptonshire County Council / North Northants JPU</p>	<p>Refers to: para. 3.3 and Objective 8</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: Strategic objective 8 Firstly, we welcome the fact that health and wellbeing are explicitly recognised within the Local Plan Part 2, integral as they are to creating sustainable communities. Specifically, we support the inclusion of strategic objective 8 – Public Health. We welcome the fact that the important role of planning in supporting health and wellbeing is acknowledged, both from the perspective of creating new development that supports healthy and active lifestyles as well as the importance of securing appropriate infrastructure through the planning process to support the provision of appropriate and accessible local health services. This is very much in line with the increased focus on health and wellbeing within the National Planning Policy Framework, notably the sections referred to below: 8. Promoting healthy and safe communities 91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			92. To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; and Planning Guidance relating to Health and Wellbeing: https://www.gov.uk/guidance/health-and-wellbeing		
Representation reference: 35/1/4 Name: Historic England	Refers to: Objective 6	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Sound and welcomed.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 97/1/6 Name: Clayson Country Homes	Refers to: Policy 1	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In response to the content of Policy 1 of the LPP2, it is considered that this policy could be suitably revised and amended to remove any repetition of Chapter 5, in particular Para 11, of the NPPF.	Suggested changes: None.	Officer comments: Policy 1 sets out the presumption in favour of sustainable development in line with the NPPF and the West Northamptonshire Joint Core Strategy, as well as for the remainder of the LPP2. No modification required.
Representation reference: 123/1/3 Name: Henry Martin Ltd	Refers to: Policy 1	Legal compliance and soundness: Plan is legally compliant.	Comments: Policy 1 - Presumption in Favour of Sustainable Development This policy is welcomed because will enable sustainable development to come forward in the Borough over the plan period. It will also ensure that decision-makers adopt a positive	Suggested changes: None.	Officer comments: Noted.

		Plan is unsound: - not effective	and proactive approach towards development proposals as required by paragraphs 11 and 38 of the NPPF and Policy SA of the West Northamptonshire Joint Core Strategy Local Plan (Part 1).		
Representation reference: 148/1/10 Name: St Clair Land and Developments LLP	Refers to: Policy 1	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In response to the content of Policy 1 of the LPP2, it is considered that this policy could be suitably revised and amended to remove any repetition of Chapter 5, in particular Para 11, of the NPPF.	Suggested changes: None.	Officer comments: The policy reinforces the message that this presumption in sustainable development is required within this predominantly urban area which is dominated by heritage assets and natural environment.
Representation reference: 195/1/6 Name: Mr B Cheer	Refers to: Policy 1	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In response to the content of Policy 1 of the LPP2, it is considered that this policy could be suitably revised and amended to remove any repetition of Chapter 5, in particular Para 11, of the NPPF.	Suggested changes: Remove the repetition.	Officer comments: The policy reinforces the message that this presumption in sustainable development is required within this predominantly urban area which is dominated by heritage assets and natural environment.
Representation reference: 200/1/29	Refers to: Policy 1	Legal compliance and soundness:	Comments: Policy 1 : Presumption in favour of sustainable development	Suggested changes: This policy is unnecessary	Officer comments: The policy reinforces the

<p>Name: HBF</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Policy 1 sets out the presumption in favour of sustainable development. The 2019 NPPF confirms that Local Plans should avoid unnecessary duplication including repetition of policies in the NPPF itself (para 16f). The presumption in favour of sustainable development is clearly set out in the 2019 NPPF (para 11). In attempting to repeat national policy there is a danger that some inconsistencies creep in and lead to small but critical differences between national and local policy causing difficulties in interpretation and relative weighting.</p>	<p>therefore it should be deleted.</p>	<p>message that this presumption in sustainable development is required within this predominantly urban area which is dominated by heritage assets and natural environment.</p>
<p>Representation reference: 250/1/8</p> <p>Name: St Clair Land and Developments LLP Old Bedford Road</p>	<p>Refers to: Policy 1</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In response to the content of Policy 1 of the LPP2, it is considered that this policy could be suitably revised and amended to remove any repetition of Chapter 5, in particular Para 11, of the NPPF.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The policy reinforces the message that this presumption in sustainable development is required within this predominantly urban area which is dominated by heritage assets and natural environment.</p>
<p>Representation reference: 172/1/19</p> <p>Name: Homes England</p>	<p>Refers to: para. 5.28 and Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design expectations, and how these will be tested (NPPF 2019, Paragraph 124).</p>	<p>Suggested changes: These should be reworded as follows: POLICY 4 - AMENITY AND LAYOUT Development will be required to create and protect a high standard of</p>	<p>Officer comments: It is agreed that a proposed modification to the plan will clarify the policy. Modify Policy 4 and para 5.28 to include wording in brackets []. POLICY 4 - AMENITY AND LAYOUT</p>

				<p>amenity for occupiers. In particular new development should ensure:</p> <ul style="list-style-type: none"> • New development is not overbearing upon existing buildings or open spaces • 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 • The outlook and visual amenity afforded from within buildings and private / communal garden areas should be satisfactory taking account of the relationship with 	<p>Development will be required to create and protect a high standard of amenity for occupiers. In particular new development should ensure:</p> <ul style="list-style-type: none"> • New development is not overbearing upon existing buildings or open spaces • 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 • The outlook and visual amenity afforded from within buildings and private / communal garden areas should be satisfactory
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				<p>neighbouring buildings and the wider street scene, including the design of parking, boundary treatments and landscaping</p> <ul style="list-style-type: none"> • Shared circulation space and routes to private entrances within flatted development should be welcoming, and be naturally lit wherever possible • Provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards, or successor guidance • There is adequate access to both high quality recreational and semi-natural green spaces for all residents 	<p>taking account of the relationship with neighbouring buildings and the wider street scene, including the design of parking, boundary treatments and landscaping</p> <ul style="list-style-type: none"> • Shared circulation space and routes to private entrances within flatted development should be welcoming, and be naturally lit wherever possible • Provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards, or successor guidance • There is adequate access to both high quality recreational and semi-natural green spaces for all residents
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				<ul style="list-style-type: none"> • Tat [all] developments include high-quality public realm • There are adequate facilities for the storage of bins, including recycling, which are effectively designed for ease of use, access and layout <p>5.28 Plannig [including through the usage of design tools such as Building for a Healthy Life (BHL)], 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:</p>	<ul style="list-style-type: none"> • hTat [all] developments include high-quality public realm • There are adequate facilities for the storage of bins, including recycling, which are effectively designed for ease of use, access and layout <p>5.28 Plannig [including through the usage of design tools such as Building for a Healthy Life (BHL)], 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:</p>
Representation reference: 172/1/17	Refers to: para. 5.5	Legal compliance and soundness: Plan is legally compliant.	Comments: As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design	Suggested changes: These should be reworded as follows:	Officer comments: It is agreed that a proposed modification to the

<p>Name: Homes England</p>		<p>Soundness: - not specified</p>	<p>expectations, and how these will be tested (NPPF 2019, Paragraph 124).</p>	<p>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 National Design Guide¹⁶. The Council also believes that meeting Building for Life criteria [and the new Building for a Healthy Life (BHL)] helps achieve urban design principles. Building for Life (BfL) [is a design tool designed to help structure discussions about proposed new residential development]. The Council supports use of BfL, [and the updated BHL and successor design tools] as well as other relevant</p>	<p>plan will clarify the paragraph. Amend para 5.5 to include the wording in brackets []. 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 National Design Guide¹⁶. The Council also believes that meeting Building for Life criteria [and the new Building for a Healthy Life (BHL)] helps achieve urban design principles. Building for Life (BfL) [is a design tool designed to help structure discussions about proposed new residential development]. The Council supports use of BfL, [and the</p>
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				guidance, including the Design Companion for Planning and Placemaking, National Design Guide and Active Design ¹⁷ to help structure pre-application discussions between local communities, the Council and the developer of a proposed scheme.	updated BHL and successor design tools] as well as other relevant guidance, including the Design Companion for Planning and Placemaking, National Design Guide and Active Design ¹⁷ to help structure pre-application discussions between local communities, the Council and the developer of a proposed scheme.
Representation reference: 35/1/5 Name: Historic England	Refers to: Policy 2	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Placemaking bullet points 4, 5 and 6 are sound.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 75/1/3 Name: Town Centre Conservation Area Advisory Committee	Refers to: Policy 2	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective - not consistent with national policy	Comments: Policy 2 Placemaking (pp38) Beyond responding to and enhancing the historic environment, there is a need to restore where it has been lost or damaged and maintain what is left.	Suggested changes: Amend this bullet point to: “Maintaining and where necessary restoring, as well as responding to and enhancing locally distinct townscape, landscape and	Officer comments: The NPPF seeks to conserve and enhance the historic environment which includes designated and non-designated assets and their settings. Policy 31 of the LPP2 sets out

				historic environment characteristics".	the requirements on how to achieve this. No modification required.
Representation reference: 97/1/7 Name: Clayson Country Homes	Refers to: Policy 2	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Similarly, in terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.	Suggested changes: None.	Officer comments: The contents of Policies 2 and 3 contain elements specific to Northampton Borough and build on the NPPF. No modification required.
Representation reference: 97/1/9 Name: Clayson Country Homes	Refers to: Policy 2	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.	Suggested changes: None.	Officer comments: The preparation of SPDs is, by virtue of regulations, required to be linked to a policy. It is not considered necessary to provide a link to any future SPDs particularly as there is no guarantee that those SPDs will be prepared.
Representation reference: 148/1/11 Name: St Clair Land and Developments LLP	Refers to: Policy 2	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: in terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.	Suggested changes: None.	Officer comments: The policy has been formulated to provide interpretation of the NPPF for application at the local level.

Representation reference: 148/1/13 Name: St Clair Land and Developments LLP	Refers to: Policy 2	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances.	Suggested changes: None.	Officer comments: SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need to mention this in a policy.
Representation reference: 172/1/12 Name: Homes England	Refers to: Policy 2	Legal compliance and soundness: Plan is legally compliant. Soundness: - not specified	Comments: Homes England's Strategic Plan commits the Agency to improving design quality including through the use of Building for Life 12 (BfL12; now Building for a Healthy Life, see below) and other tools. Homes England welcomes the references to design quality and the opportunities to deliver quality design in Policies 2,3,4,6 & 7.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 195/1/7 Name: Mr B Cheer	Refers to: Policy 2	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Similarly, in terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.	Suggested changes: Remove repetitions.	Officer comments: The policy has been formulated to provide interpretation of the NPPF for application at the local level.
Representation reference: 195/1/9 Name: Mr B Cheer	Refers to: Policy 2	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.	Suggested changes: Provide reference to future SPDs in policy 2.	Officer comments: SPDs by their very nature can be prepared to provide details on the implementation of the policy. There is no need for SPDs to be referenced in a policy.

<p>Representation reference: 229/1/4</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 2</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The policy refers to “easily accessible”, but is not explicit in what is meant by “ease”. Does this relate to the time taken to access these facilities? Safe? Convenient? The NPPF provides more context to the term “ease”. Paragraph 91 (a) of the NPPF states that “Planning Policies and decisions should aim to achieve healthy, inclusive and safe places which, for example, through mixed use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods”. The policy does not refer to the need to provide safe and accessible healthy communities as referenced in paragraph 91 (b) of the NPPF. The policy by virtue of its lack of explicitly in terms of the word ease and there being no reference made to the need to provide safe and accessible health communities, is therefore not consistent with national policy,</p>	<p>Suggested changes: Incorporate a mix of accessible facilities, through street layouts that allow for easy, safe pedestrian and cycle connections for day to day living... or providing easy, safe, and pedestrian and cycle connections through street layouts to those facilities nearby.</p>	<p>Officer comments: The Northampton LPP2 does not need to replicate what is in the National Planning Policy Framework. No modification required.</p>
<p>Representation reference: 250/1/9</p> <p>Name: St Clair Land and Developments LLP Old Bedford Road</p>	<p>Refers to: Policy 2</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The policy has been formulated to provide interpretation of the NPPF for application at the local level.</p>
<p>Representation reference: 250/1/11</p> <p>Name: St Clair Land and Developments LLP Old Bedford Road</p>	<p>Refers to: Policy 2</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD’s which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the</p>	<p>Suggested changes: None.</p>	<p>Officer comments: SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need for this to</p>

			overall aims and objectives for the Borough over the life of the plan.		be mentioned in a policy.
Representation reference: 60/1/3 Name: Northamptonshire Police	Refers to: Policy 3	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I am pleased to note the reference to security and crime prevention in Policy 3 Design.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 75/1/4 Name: Town Centre Conservation Area Advisory Committee	Refers to: Policy 3	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective - not consistent with national policy	Comments: A healthy design should include access to nature and natural environments, and taking the opportunity to create natural environments. This is important not only in existing natural sites at the edge of the town, but also for improving the lives of people living within the town centre by encouraging nature all around them, and creating green corridors of habitat for wildlife.	Suggested changes: Therefore add a bullet point “Designs should create areas of natural environment which prioritise nature, and where allow visual, aural and where possible physical access to people. For small scale sites this may include retaining or creating gardens with soft, permeable surfaces and planting which encourages wildlife, for larger scale sites this may include larger wildlife areas with suitable habitat to encourage nature.”	Officer comments: Policy 27 of the LPP2 requires new developments to sustain and enhance existing, and support the creation of, Northampton's green infrastructure. This includes ensuring green infrastructure assets are protected, managed, maintained and connected. Development proposals will need to demonstrate how they make a positive contribution to projects identified in Northampton Green Infrastructure Plan. Policy 3 requires new developments

				<ul style="list-style-type: none"> - Add a bullet point "Materials and design should respect and respond to the local vernacular." - Add a bullet point "Design codes should be developed for conservation areas" 	to incorporate design coding. Conservation Areas within the borough are guided by Appraisals and Management Plans. Combined with Policy 3 LPP2 it is considered that no modification in necessary to the policy.
<p>Representation reference: 75/1/5</p> <p>Name: Town Centre Conservation Area Advisory Committee</p>	Refers to: Policy 3	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: When assessing sustainability, the assessment of environmental impact should include construction and loss of 'embodied energy' in existing housing stock.</p>	<p>Suggested changes: Amend bullet point to "Should be as sustainable as possible and constructed in a sustainable fashion, including an assessment of the whole-life from site clearance, to building, to maintenance, to demolition."</p>	<p>Officer comments: Policy 3 contains the following bullet point: 'Be as sustainable as possible and constructed in a sustainable fashion'. This is considered to cover the point made by the respondent. No modification required.</p>
<p>Representation reference: 97/1/8</p> <p>Name: Clayson Country Homes</p>	Refers to: Policy 3	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Similarly, in terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The contents of Policies 2 and 3 contain elements specific to Northampton Borough and build on the NPPF. No</p>

					modification required.
Representation reference: 97/1/10 Name: Clayson Country Homes	Refers to: Policy 3	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.	Suggested changes: None.	Officer comments: The preparation of SPDs is, by virtue of regulations, required to be linked to a policy. It is not considered necessary to provide a link to any future SPDs particularly as there is no guarantee that those SPDs will be prepared.
Representation reference: 148/1/12 Name: St Clair Land and Developments LLP	Refers to: Policy 3	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.	Suggested changes: None.	Officer comments: The policy has been formulated to provide interpretation of the NPPF for application at the local level.
Representation reference: 148/1/14 Name: St Clair Land and Developments LLP	Refers to: Policy 3	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances.	Suggested changes: None.	Officer comments: SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need to mention this in a policy.
Representation reference: 172/1/13	Refers to: Policy 3	Legal compliance and soundness:	Comments: Homes England's Strategic Plan commits the Agency to improving design quality including through the use of Building	Suggested changes: None.	Officer comments: Noted.

<p>Name: Homes England</p>		<p>Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>for Life 12 (BfL12; now Building for a Healthy Life, see below) and other tools. Homes England welcomes the references to design quality and the opportunities to deliver quality design in Policies 2,3,4,6 & 7.</p>		
<p>Representation reference: 172/1/18</p> <p>Name: Homes England</p>	<p>Refers to: Policy 3</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design expectations, and how these will be tested (NPPF 2019, Paragraph 124).</p>	<p>Suggested changes: These should be reworded as follows: POLICY 3 DESIGN 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 	<p>Officer comments: It is agreed that a proposed modification to the plan will clarify the policy. Modify Policy 3 to include the wording in brackets []: 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

				<p>incorporated into the site layout and building design</p> <ul style="list-style-type: none"> • Ensure residents' privacy and adequate levels of sunlight and daylight • Be as sustainable as possible and constructed in a sustainable fashion <p>* 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> <ul style="list-style-type: none"> • Incorporate green roofs and living walls into the building design where possible • Achieve the Building for Life an [updated Building for a 	<p>prevention measures incorporated into the site layout and building design</p> <ul style="list-style-type: none"> • Ensure residents' privacy and adequate levels of sunlight and daylight • Be as sustainable as possible and constructed in a sustainable fashion <p>* 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> <ul style="list-style-type: none"> • Incorporate green roofs and living walls into the building design where possible • Achieve the Building for Life an
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				Healthy 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.	[updated Building for a Healthy Le] 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.
Representation reference: 195/1/8 Name: Mr B Cheer	Refers to: Policy 3	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Similarly, in terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.	Suggested changes: None.	Officer comments: The policy has been formulated to provide interpretation of the NPPF for application at the local level.
Representation reference: 195/1/10	Refers to: Policy 3	Legal compliance and soundness: Plan is legally compliant.	Comments: Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some	Suggested changes: Provide reference to future SPDs in policy 3.	Officer comments: SPDs by their very nature are there to provide details on

Name: Mr B Cheer		Plan is sound.	future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.		the implementation of the policy. There is no need to reference it in the policy itself.
Representation reference: 200/1/30 Name: HBF	Refers to: Policy 3	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Policy 3 : Design Under Policy 3 new developments should be designed to achieve the Building for Life certification. The Council's policy approach to good placemaking should accord with the 2019 NPPF, the latest NPPG and the National Design Guide. The Building for Life 12 (edition 2018) has been replaced by Building for a Healthy Life (edition 2020). The HBF is supportive of the use of best practice guidance, however the use of such guidance should remain voluntary rather than becoming a mandatory policy requirement, which developers are obliged to use as a pre- condition for the Council's support.	Suggested changes: The requirement to achieve Building for Life certification should be deleted.	Officer comments: It is agreed that a modification be proposed to update the plan. Replace Building for Life (edition 2018) with 'Building for a Healthy Life' (Edition 2020).
Representation reference: 229/1/5 Name: Barratt David Wilson Homes	Refers to: Policy 3	Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: The policy refers to the need to incorporate sustainable design, but this is a vague statement with no reference to within the preceding paragraphs as to what is envisaged for sustainable design. It is not considered necessary to include "be as sustainable as possible and constructed in a sustainable fashion", as the first bullet point of this policy covers these matters. There is no mention of a Supplementary Planning Document (SPD) that will elaborate on the sustainable design requirements. Without an SPD or further elaboration of what is meant by sustainable design, it will prove difficult to cost in site appraisals. This part of the policy is, therefore, not effective.	Suggested changes: None.	Officer comments: Policy 5 sets out the requirements that developments will need to meet to achieve sustainable design. No modification required.

<p>Representation reference: 229/1/6</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 3</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The need for design coding for major Developments (10 or more dwellings or the development is to be carried out on a site area of 0.5ha or more and it is not known how many houses will be generated) as a carte blanche approach would, perhaps, be rather onerous. The requirement for a Design Code for a major Development should be considered on a case by case basis. This part of the policy is therefore not justified.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone a full viability assessment and it concludes that Design requirements (in Policy 3) are not an onerous cost over and above that provided in BCIS. No modification required.</p>
<p>Representation reference: 229/1/7</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 3</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: There is no acknowledgement in the policy of the ability to consider a site's inherent characteristics that would prohibit the ability to achieve the policy's requirement. Nor is there the ability to consider site viability.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone a viability assessment and it has been concluded that the plan is viable. Each site is therefore expected to meet the requirements of Policy 3. No modification required.</p>
<p>Representation reference: 229/1/8</p>	<p>Refers to: Policy 3</p>	<p>Legal compliance and soundness:</p>	<p>Comments:</p>	<p>Suggested changes: The policy should, therefore, be</p>	<p>Officer comments: Amend Policy 3 Replace Building for</p>

<p>Name: Barratt David Wilson Homes</p>		<p>Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Whilst a positive element of the design policy is to achieve BFL accreditation, to achieve such accreditation can only be done after the scheme is built.</p>	<p>amended to state that the criteria outlined in “Building for Healthy communities” should be used as a toolkit throughout the planning process to benchmark the design.</p>	<p>Life certification with 'Building for a Healthy Life certification' The Council considers that all developments should meet Building for a Healthy Life criteria. No modification required with regards to criteria being used as a toolkit.</p>
<p>Representation reference: 229/1/9</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 3</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The definition of small scale development of 10 dwellings or less conflicts with the definition of Major Development as stated in s(2) Part 1 of the Town and Country Planning Development Management Procedure Order 2015. The policy has no justification in requiring a design code for 10 or more dwellings and its not effective in allowing the considering of viability and site inherent characteristics.</p>	<p>Suggested changes: Modification - To assist in the achievement of good place making, new Developments should be designed, where the site’s characteristics and site’s viability allows to:-</p> <ul style="list-style-type: none"> • Incorporate sustainable design from the outset (an SPD will be produce in due course)... • Strike out “be as sustainable possible and constructed in a 	<p>Officer comments: The definition of major development within the Town and Country Planning Development Management Procedure Order 2015 is 'the provision of dwelling houses where (i) the number of dwelling houses to be provided is 10 or more'. The LPP2 has undergone a viability assessment and the Plan has been found viable.</p>

				<p>sustainable fashion..”</p> <ul style="list-style-type: none"> • Incorporate a Design Code, where required through negotiations between the Council and applicant to ensure consistency of design approach. • To enable the criteria referenced in “Building for Healthy Communities” to be achieved. 	No modification required.
<p>Representation reference: 244/1/17</p> <p>Name: Bastion Group</p>	<p>Refers to: Policy 3</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Bastion support the overall policy approach set out in Policy 3 and consider that the components established are essential to secure high-quality development both on the site and across Northampton. There are, however, two elements of this policy we suggest are reviewed and wording amended to provide a more effective policy and one that is consistent with national policy.</p> <p>The requirement to achieve Building for Life (BfL) Certification – it should be noted that there is no longer a formal accreditation for BfL 12. We suggest that if use of BfL is to be encouraged through Policy 3, it should be articulated as a requirement for a planning application to have regard to and provide a score against the BfL 12 criteria.</p>	<p>Suggested changes: • Achieve the Building for Life Certification Planning Applications should have regard to and provide a score of the proposals against the Building for Life 12 criteria.</p>	<p>Officer comments: It is agreed that Policy 3 needs to be updated to reflect the reference to Building for a Healthy Life. Modify Policy 3 accordingly.</p>
<p>Representation reference: 244/1/18</p>	<p>Refers to: Policy 3</p>	<p>Legal compliance and soundness:</p>	<p>Comments: The reference to incorporating Design Coding in major developments to ensure consistency of design approach is not</p>	<p>Suggested changes: We recommend that this wording is</p>	<p>Officer comments: In order to ensure the quality of new</p>

<p>Name: Bastion Group</p>		<p>Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>considered to be sufficiently specific or clear for an effective policy position. Major development as set out in the Plan glossary relates to all developments over 10 homes or over 0.5ha for residential or over 1000m2 of floorspace or 1 hectare for non- residential development. Whilst Bastion support the use and value of Design Coding on large strategic sites, it is not considered necessary on small / medium scale 'major developments', i.e. those below circa 200 homes, especially not for residential developments of between 10 – 100 homes. It is possible that such applications are pursued in detail at the outset and as such full design detail is provided and would be justified and explained through a Design and Access Statement required as part of a planning application.</p>	<p>amended so that it is more precise in its requirements as follows:</p> <ul style="list-style-type: none"> • Incorporate design coding (in the case of major developments) for consistency of design approach <p>Design Codes should be prepared for all strategic scale major residential or residential led developments (above 200 units).</p>	<p>development in Northampton is kept consistent, design coding for developments of differing sizes is considered necessary.</p>
<p>Representation reference: 250/1/10</p> <p>Name: St Clair Land and Developments LLP Old Bedford Road</p>	<p>Refers to: Policy 3</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In terms of Policy 2 and Policy 3 which respectively seek to address place making and design, whilst it is considered that locally specific policy in respect of each is required, some minor revision of each policy could serve to remove some of those elements which are already catered for within the NPPF.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The policy has been formulated to provide interpretation of the NPPF for application at the local level.</p>
<p>Representation reference: 250/1/12</p> <p>Name: St Clair Land and Developments LLP Old Bedford Road</p>	<p>Refers to: Policy 3</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the</p>	<p>Suggested changes: None.</p>	<p>Officer comments: SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need to mention it in a policy.</p>

			overall aims and objectives for the Borough over the life of the plan.		
<p>Representation reference: 251/1/4</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 3</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: Policy 3 requires that new developments are required to 'achieve the Building for Life certification'. The Council's policy approach to good placemaking should accord with the NPPF and the latest PPG. The PPG1 confirms that the National Design Guide, which 'sets out the characteristics of well-design places and demonstrates what good design means in practice', should also be read alongside. Firstly, the Building for Life 12 (edition 2018) has since been replaced by Building for a Healthy Life (edition 2020) and therefore its inclusion does not represent the most up-to-date assessment framework; though BHL2 does indeed note that 'as BHL is the new name for Building for Life 12, local authorities can use BHL without having to rewrite existing policy documents.'</p>	<p>Suggested changes: Replace Building for Life (edition 2018) with 'Building for a Healthy Life' (Edition 2020).</p>	<p>Officer comments: Agreed. Modify the plan and replace Building for Life (edition 2018) with 'Building for a Healthy Life' (Edition 2020).</p>
<p>Representation reference: 251/1/5</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 3</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: Notwithstanding, whilst the Developers are supportive of the use of best practice guidance, imposing the requirement to achieve Building for Life certification on new developments should remain discretionary rather than becoming a mandatory policy requirement.</p> <p>Indeed, the policy wording does not refer to minimum development thresholds and would therefore appear applicable to all new development. Such a proposed approach does not accord with the PPG3 which advises the following: 'What are assessment frameworks and how can they be used appropriately? Assessment frameworks are a set of criteria against which a design can be assessed. They can cover a range of issues that</p>	<p>Suggested changes: In this regard, any minimum development threshold should apply to large scale housing and mixed use developments proposing approximately 500 dwellings or more.</p>	<p>Officer comments: Amend Policy 3 Replace Building for Life certification with 'Building for a Healthy Life certification'. The Council considers that all developments should meet Building for a Healthy Life criteria. No modification required.</p>

		<p>are important for securing well-designed places (such as Building for Life 12) or may focus on particular considerations such as climate change or health.</p> <p>Local planning authorities and developers may wish to use assessment frameworks to inform the design and evaluation of proposals, and support discussions with local communities and other interests about the creation of good places. Frameworks are effective when the issues within them are considered in relation to the particular context and character of a local area. Authorities may wish to refer to the use of specific frameworks in their policies or supplementary planning guidance that are most relevant to the vision for their area, although it is important to ensure that they are used in a proportionate way and do not conflict with national or local planning policy.’ [Emphasis added]</p> <p>The Developers consider the requirement to achieve Building for Life certification on all new developments is disproportionate and unjustified, contrary to NPPF Paragraph 35 which considers plans and its policies ‘sound’ provided they are justified.</p> <p>Its inclusion would create the requirement to secure certification/commendation on all new development, with details likely requiring approval at the reserved matters or pre-commencement stage.</p> <p>In this regard, it is noted that BHL Commendations can be applied for on developments which meet the green light criteria contained within BHL, subject only to the BHL Review and its approval⁴.</p> <p>In cases for non-large-scale housing development, such a process adds unnecessary cost and delay to the decision-making process, contrary to NPPF Paragraph 59 which states that land with permission should be developed without</p>		
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			<p>unnecessary delay. In any event, the design of applications for small and medium-scale residential development will already be subject to review by the Council's Urban Design Officer against the requirements draft Policy 2 (Placemaking) and elsewhere in Policy 3. To add another layer of design scrutiny through the requirements of a BHL Review would be unnecessary and burdensome.</p> <p>The requirement to achieve Building for Life certification should be deleted or, alternatively, its wording amended to include a minimum development threshold to align with the objectives and suggested use of assessment frameworks stated within NPPF Paragraph 129: 'Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for Life. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.' [Emphasis added]</p>		
<p>Representation reference: 201/1/4</p> <p>Name: Persimmon Homes</p>	<p>Refers to: para. 5.9</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: The plan's evidence base does not elaborate on this commentary and we would submit that paragraph 5.9 alone is inadequate for demonstrating need for internal space standards in Northampton. For instance, there is no clarity as to the precise size of each of the dwellings in the of the sample used, the locational split of the developments across the Borough and whether this is representative of the planned housing supply, which parts of the NDSS guidance were met</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The Council has prepared an Optional Higher Technical Standards paper (July 2020) which outlines the need to comply with the NDSS.</p>

		- not consistent with national policy	and which were not, or how substantial the shortfall against the NDSS was across the sample. Importantly, the lack of evidence also does not allow consideration of the specific size and tenure of these units that fell short against the NDSS or how this relates to the Council’s preferred housing mix.		
<p>Representation reference: 75/1/6</p> <p>Name: Town Centre Conservation Area Advisory Committee</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: Policy 4 Amenity and layout (pp40-41)</p> <ul style="list-style-type: none"> • We understand that the average life of a house is 90 years, so this demonstrates the importance of high standards and resilience to climate change and catastrophic events such as pandemics. • In the post-COVID era we should be demanding higher standards than minimum set before COVID. Setting standards based on the minimum will only reduce the health and wellbeing of residents. • Setting external amenity spaces to meet the “reasonable needs of its users” is too vague and open to abuse (second bullet point of policy). • Northampton should set its own standards through an updatable SPD, which should never be less than national minimum requirements and can enforce the higher standards that Northampton’s residents deserve. This will be more flexible to incorporate improvements in the future. • The standards should also apply to conversions, not just to new builds, and to HIMOs. 	<p>Suggested changes:</p> <ul style="list-style-type: none"> - Therefore amend the second bullet point by changing “reasonable needs of its users” to “Northampton SPD standards”. - And amend the fifth bullet point to: “Provision of at least the minimum internal and external space standards and storage areas as set out in the Northampton SPD, for new builds and conversions including HIMOs.” - apply at least the new build space standards to conversions and HiMOS – see also Policy 15 p69-70. 	<p>Officer comments: The preparation of SPDs is, by virtue of regulations, required to be linked to a policy. It is not considered necessary to provide a link to any future SPDs particularly as there is no guarantee that those SPDs will be prepared. Policy 3 of the LPP2 requires new developments to achieve Building for Life certification. Policy 4 requires provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards. No modification required.</p>

<p>Representation reference: 97/1/11</p> <p>Name: Clayson Country Homes</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The preparation of SPDs is, by virtue of regulations, required to be linked to a policy. It is not considered necessary to provide a link to any future SPDs particularly as there is no guarantee that those SPDs will be prepared.</p>
<p>Representation reference: 172/1/14</p> <p>Name: Homes England</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant. Soundness: - not specified</p>	<p>Comments: Homes England's Strategic Plan commits the Agency to improving design quality including through the use of Building for Life 12 (BfL12; now Building for a Healthy Life, see below) and other tools. Homes England welcomes the references to design quality and the opportunities to deliver quality design in Policies 2,3,4,6 & 7.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 195/1/11</p> <p>Name: Mr B Cheer</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: Furthermore, in respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.</p>	<p>Suggested changes: Provide reference to future SPDs in policy 4.</p>	<p>Officer comments: SPDs by their very nature are there to provide details on the implementation of the policy. There is no need to reference it in the policy itself.</p>

<p>Representation reference: 200/1/31</p> <p>Name: HBF</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Policy 4 : Amenity & Layout requires that new development should ensure provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards (NDSS) or successor guidance.</p> <p>If the Council wishes to apply the optional NDSS to new build dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46). Footnote 46 states that “policies may also make use of the NDSS where the need for an internal space standard can be justified”. As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that “where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing” (ID: 56- 020-20150327). Before adopting the NDSS, the Council should provide a local assessment evidencing the case for Northampton.</p> <p>The Council has not demonstrated via its desktop research (para 5.9) any evidence of need for the NDSS. The Council undertook a desktop study of circa 100 developments granted consent between 2015 – 2018, which concluded that 50% met NDSS, therefore there is no systemic problem to resolve. This correlates with the HBF’s own evidence. The HBF is not aware of any evidence that market dwellings not meeting the NDSS have not sold or that those living in these dwellings consider that their housing needs are not met. There is no evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings. The HBF in partnership with National House Building Council (NHBC) undertake an annual independently verified National New</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The NDSS Technical Paper sets out the Council's evidence for adopting optional Nationally Described Space Standards. No modification required.</p>
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			Homes Customer Satisfaction Survey. The 2019 Survey demonstrates that 91% of new home buyers would purchase a new build home again and 89% would recommend their housebuilder to a friend. The results also conclude that 93% of respondents were happy with the internal design of their new home, which does not suggest that significant numbers of new home buyers are looking for different layouts or house sizes to that currently built.		
Representation reference: 200/1/32 Name: HBF	Refers to: Policy 4	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: The NDSS should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as “requiring something because it is essential or very important rather than just desirable”. The identification of a need for the NDSS should identify the harm caused or may be caused in the future. If it had been the Government’s intention that generic statements simply stating in some cases the NDSS had not been met justified adoption of the NDSS then the standard would have been incorporated as mandatory in Building Regulations, which is not the case.	Suggested changes: None specified.	Officer comments: The NDSS Technical Paper sets out the Council’s evidence for adopting optional Nationally Described Space Standards. No modification required.
Representation reference: 200/1/33 Name: HBF	Refers to: Policy 4	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: To test the cumulative impact of policy requirement compliancy, the Council’s viability assessment should be based on NDSS. The Council’s Plan Viability Study by Aspinall Verdi has not properly tested the impacts of introducing the NDSS. The average house sizes tested are not NDSS compliant (see Tables 5-11, 5-12 & 5-13). The Council’s viability assessment should recognise that the requirement for NDSS reduces the number of dwellings per site, therefore the amount of land needed to achieve the same number of dwellings must be increased. The efficient use of land is less because development densities have been decreased. At the same time, infrastructure and other contributions fall on fewer dwellings per site, which may challenge viability, delivery of affordable	Suggested changes: None.	Officer comments: Table 5-3 of the Viability Assessment sets out that the MHCLG NDSS have been used to determine viability of the Plan. No modification required.

			housing and release of land for development by landowners especially in lower / middle value areas and on brownfield sites.		
Representation reference: 200/1/34 Name: HBF	Refers to: Policy 4	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: The impact of adopting NDSS on affordability should also be assessed. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. Over the last two decades housing affordability in the Borough has worsened. In 1997, the median affordability ratio was 3.1, which has more than doubled by increasing to 7.02 in 2019. The Council should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all dwellings will impact on affordability and effect customer choice. The introduction of the NDSS for all dwellings may lead to customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs. A future purchaser needing a 2 bedroomed home may only be able to afford a 2 bed / 3 person dwelling of 70 square metres with one double bedroom and one single bedroom rather than 2 bed / 4 person dwelling of 79 square metres with two double bedrooms. This may lead to the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. Non-NDSS compliant dwellings may be required to ensure that those on lower incomes can afford a property, which meets their bedroom requirements.	Suggested changes: None specified.	Officer comments: The policy has been assessed as being viable.
Representation reference: 200/1/35 Name: HBF	Refers to: Policy 4	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified	Comments: The Council should assess any potential adverse impacts on meeting demand for starter homes / first-time buyers because the greatest impacts are on smaller dwellings, which may affect delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be determined by market affordability at relevant price points of dwellings and maximising absorption rates. An adverse impact on the	Suggested changes: None specified.	Officer comments: The policy has been assessed as being viable.

		<ul style="list-style-type: none"> - not effective - not consistent with national policy 	affordability of starter home / first time buyer products may translate into reduced or slower delivery rates.		
Representation reference: 200/1/36 Name: HBF	Refers to: Policy 4	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	Comments: The Council should also consider if additional families, who can no longer afford to buy a NDSS compliant home, will be pushed into affordable housing need. An unintended consequence of the Council's policy approach may be an increased need for affordable housing at the same time as the cumulative impact of compliancy with policy requirements reduces the viability of development and lessens delivery of affordable housing.	Suggested changes: None specified.	Officer comments: The policy has been assessed as being viable.
Representation reference: 200/1/37 Name: HBF	Refers to: Policy 4	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	Comments: If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date. The requirement for NDSS should be deleted. If the NDSS is adopted then the Council should put forward appropriate proposals for transitional arrangements.	Suggested changes: None specified.	Officer comments: It is considered that the development industry will have sufficient time to comply with the policy requirements and a transitional arrangement is not deemed necessary.
Representation reference: 201/1/3 Name:	Refers to: Policy 4	Legal compliance and soundness: Plan is legally compliant.	Comments: Local planning authorities can require compliance with the Nationally Described Space Standards (NDSS) through the local plan process but the Planning Practice Guidance (PPG) is clear	Suggested changes: None specified.	Officer comments: The Council has prepared an Optional Higher

Persimmon Homes		<p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>that the need for the NDSS must be established in the authority area. The PPG refers to three key aspects that should be assessed as part of this:</p> <p>Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes</p> <p>Viability – the impact of adopting the space standard should be considered as part of the plan’s viability assessment with account taken of the impact of potentially larger dwellings on the land supply. Local planning authorities will also need to consider the impact on affordability where a space standard is to be adopted</p> <p>Timing – There may need to be a reasonable transition period following the adoption of a new policy on space standards to enable developers to factor the cost of space standards into future acquisitions.</p> <p>Where demonstrating need is concerned, the only commentary is in paragraph 5.9 of the supporting text to draft Policy 4. This states that “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.”</p>		<p>Technical Standards paper (July 2020) which outlines the need to comply with the NDSS.</p>
<p>Representation reference: 201/1/5</p> <p>Name: Persimmon Homes</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p>Comments: There is no comprehensive explanation of how viability implications of the NDSS have been tested. We note the following commentary at paragraph 5.18 of the Plan Viability Study (June 2020):</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: All developments are required to provide at least the minimum internal space standards and</p>

		<ul style="list-style-type: none"> - not justified - not effective - not consistent with national policy 	<p>“In devising suitable floor areas to use we have had regard to MHCLG minimum space standards and new build developments coming forward in the borough.”</p> <p>Simply having “had regard” to the NDSS amongst other factors in deciding on the relevant floor areas to use in appraisals is different from assessing the viability, affordability and supply implications of applying these standards to all future forthcoming schemes over the plan period. In discussing draft Policy 4, Appendix 1 to the Plan Viability Study (June 2020) does not reference the NDSS at all and states that the associated costs have been dealt with through “scheme design and allowance for external works.” This is an ambiguous statement and does not give the necessary confidence that NDSS has been properly integrated into the viability modelling. In addition, contrary to the requirements of the PPG, there is no commentary on the impacts of requiring larger dwellings on the future land supply (a significant consideration given the largely urban nature of the authority’s area) nor any qualitative consideration of the corresponding impacts upon affordability.</p>		<p>storage areas as set out in the Nationally Described Space Standards, or successor guidance. This has been tested through the LPP2’s viability assessment and has been found to be achievable. No modification required.</p>
<p>Representation reference: 201/1/6</p> <p>Name: Persimmon Homes</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: <ul style="list-style-type: none"> - not justified - not effective - not consistent with national policy </p>	<p>Comments: Finally, no consideration has been given to the desirability or otherwise of a transitional period and we would expect this to be assessed in light of the commentary in the PPG.</p>	<p>Suggested changes: Finally, no consideration has been given to the desirability or otherwise of a transitional period and we would expect this to be assessed in light of the commentary in the PPG.</p>	<p>Officer comments: The LPP2 is expected to be adopted in the second half of 2021. There is sufficient opportunity for developers to transition into the new policy requirements between now and then.</p>
<p>Representation reference: 201/1/7</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness:</p>	<p>Comments:</p>	<p>Suggested changes:</p>	<p>Officer comments:</p>

<p>Name: Persimmon Homes</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Persimmon therefore OBJECTS to Policy 4 in its current form since it is not justified by proportionate evidence nor is it compliant with national policy.</p>	<p>The part of the policy that requires compliance with the NDSS should be deleted.</p>	<p>The Council has prepared an Optional Higher Technical Standards paper (July 2020) which outlines the need to comply with the NDSS. All developments are required to provide at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards, or successor guidance. This has been tested through the LPP2's viability assessment and has been found to be achievable. No modification required.</p>
<p>Representation reference: 229/1/10</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared</p>	<p>Comments: Paragraph 127 of the NPPF refers to the need to provide a high standard of amenity for existing and future occupiers with footnote 46 stating that planning policies should make use of the Government's optional technical standards for accessible and adaptable housing, where this would identify a need for such properties. The need for such properties has not been evidenced. Paragraph 5.9 states "The Council undertook desktop research of just over 100 Housing Developments granted planning permission between 2015 and 2018 and concluded that around</p>	<p>Suggested changes: Modification A qualitative study needs to be carried out and a more explicit quantitative study needs to be conducted to determine if there is a need for NDSS properties within</p>	<p>Officer comments: The LPP2 has undergone a full viability assessment and it concludes that Nationally Described Space Standards as set out as a requirement in Policy 4 can be met.</p>

		<p>- not justified - not effective - not consistent with national policy</p>	<p>half of the schemes met most of the guidance set out in the NDSS". Surveying 100 applications, of which 50% complied with the standards, has not identified a need, based on amenity grounds nor is it explicit as to what constituted meeting an NDSS housetype. To analyse the standard of amenity of the occupants within the Borough, would also take into account a qualitative approach, through surveys of people's opinions as to whether they found their non-NDSS housetype to be of poor amenity.</p> <p>For the policy to be effective it needs to stipulate that the application of NDSS can only be secured through an Outline Permission or Full application. Through QC opinions on sites within Northamptonshire County, that BDW would be happy to share with Northampton Borough Council, the application of NDSS cannot be sought through a Reserved Matters Application, as NDSS does not fall within the definition of Reserved Matters.</p> <p>The NDSS requirements as stated within the policy requires to compliance of both internal floorspce and Storage areas of NDSS. This is inconsistent with the adopted Local plan part 2 for Daventry District Council who only require internal floorspace compliance.</p> <p>Introducing an NDSS criteria, will result in larger houses being built but at what cost to the Council in terms of projected financial S106 obligations? To build to NDSS criteria does not directly recapture cost through a proportionate increase sale price. In turn, this will lead to increased viability studies accompanying applications, to demonstrate that a particular site is not viable with this stipulation.</p> <p>The policy is therefore not been adequately justified as to why NDSS is required and why storage spaces are required and nor is it effective</p>	<p>Northampton Borough. Should such studies conclude that there is a need for such houses, then the policy will need to be modified to specify what exactly is expected rather than using the phase "at least" accordingly:-</p> <ul style="list-style-type: none"> • "Provision of NDSS space standards in so far as ... will be required taking into account the site's viability" 	<p>No modification required.</p>
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<p>Representation reference: 250/1/13</p> <p>Name: St Clair Land and Developments LLP Old Bedford Road</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances. For example, the Nationally Described Space Standards have been referenced within Policy 4, through linking to SPD the Council would be able to publish local interpretations and locally specific approaches to achieving the overall aims and objectives for the Borough over the life of the plan.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need to mention this in a policy.</p>
<p>Representation reference: 251/1/6</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: Policy 4 requires that new development should ensure 'provision of at least the minimum internal space standards and storage areas as set out in the Nationally Described Space Standards (NDSS) or successor guidance.' Should the Council wish to apply the optional NDSS to new build dwellings, this should be done in accordance with Footnote 46 of NPPF Paragraph 127(f): 'Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.' As set out under Paragraph 31, all policies should be 'underpinned by relevant and up-to-date evidence', and 'should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.' Additionally, the PPG5 sets out: 'Where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Local planning authorities should take account of [need, viability and timing]'</p>	<p>Suggested changes: The Developers consider that NDSS should only be introduced on a 'need to have' rather than a 'nice to have' basis: the identification of a need for NDSS should identify the harm caused or may be caused in the future.</p>	<p>Officer comments: The NDSS Technical Paper sets out the Council's evidence for adopting optional Nationally Described Space Standards.</p>

			<p>Before adopting the NDSS, the Council should provide a local assessment evidencing the case for Northampton. The Council has not demonstrated any evidence of need for the NDSS via its desktop research⁶</p> <p>The Council undertook a desktop research of circa 100 developments granted consent between 2015 and 2018, which concluded that around half of the scheme met most of the guidance set out in NDSS; as such, there is clearly not a systemic problem which requires resolution.</p> <p>The Developers consider that NDSS should only be introduced on a 'need to have' rather than a 'nice to have' basis: the identification of a need for NDSS should identify the harm caused or may be caused in the future.</p>		
<p>Representation reference: 251/1/7</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: To test the cumulative impact of policy requirement compliancy, the Council's viability assessment should be based on NDSS, however it would appear the Council's Plan Viability Study (Aspinall Verdi, June 2020) has not properly tested the impacts of introducing NDSS.</p> <p>The average house sizes tested are not NDSS compliant (see Tables 5-11, 5-12 & 5-13). The Council's viability assessment should recognise that the requirement for NDSS decreases site density and, thus, additional land is required in order to achieve the same number of dwellings. It should also recognise that decreased densities results in a less efficient use of land and, at the same time, infrastructure and other contributions fall on fewer dwellings per site, which may challenge viability, delivery of affordable housing and release of land for development by landowners.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Table 5-3 of the Viability Assessment sets out that the MHCLG NDSS have been used to determine viability of the Plan. No modification required.</p>
<p>Representation reference: 251/1/8</p> <p>Name:</p>	<p>Refers to: Policy 4</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: The impact of adopting NDSS on affordability should also be assessed given the direct relationship between unit size, cost, value and affordability. Simply put, an increase in unit size is likely to result in an increase in build costs; in turn this will</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The policy has been assessed as viable.</p>

Duncan Investments Ltd - Site E of Towcester Rd		Plan is unsound: - not justified - not effective - not consistent with national policy	undoubtedly increase the cost of new housing in a Borough where affordability has significantly worsened in the last decade. An inflexible policy approach to NDSS for all dwellings is likely to impact on affordability and have a negative effect on customer choice: the introduction of NDSS for all dwellings may lead to customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs.		
Representation reference: 251/1/9 Name: Duncan Investments Ltd - Site E of Towcester Rd	Refers to: Policy 4	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: In this regard, the Council has not assessed the potential adverse impact on meeting demand for starter homes or first-time buyers, as outlined by the PPG7: '[...] evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.' The delivery rates on many sites will be driven by market affordability at the relevant price points of dwellings and thus maximising absorption rates. An adverse impact on the affordability of starter home and/or first-time buyer products may translate into reduced or slower delivery rates.	Suggested changes: None specified.	Officer comments: The policy has been assessed as being viable.
Representation reference: 251/1/10 Name: Duncan Investments Ltd - Site E of Towcester Rd	Refers to: Policy 4	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: Moreover, the Developers note that no assessment has been provided of how many more households will be pushed into affordable housing need as a result of the adoption of the NDSS and the increased costs, as outlined by the PPG8: '[...] the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.'	Suggested changes: None specified.	Officer comments: The policy has been assessed as viable.

			An unintended consequence of the Council's policy approach may be an increased need for affordable housing at the same time as the cumulative impact of compliancy with policy requirements reduces the viability of development and lessens delivery of affordable housing.		
Representation reference: 251/1/11 Name: Duncan Investments Ltd - Site E of Towcester Rd	Refers to: Policy 4	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements, as advised by the PPG9: '[...] there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.' Any land acquisitions underpinning residential sites may have been secured prior to any proposed introduction of the NDSS and therefore these sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date. The requirement for NDSS should be deleted or, if adopted, the Council should put forward appropriate proposals for transitional arrangements.	Suggested changes: None specified.	Officer comments: It is considered that the development industry has sufficient time to implement this policy. Transitional arrangements are not required.
Representation reference: 53/1/3 Name: Anglian Water Services Limited	Refers to: Policy 5	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Policy 5 Carbon Reduction, Community Energy Networks, Sustainable Design and Construction, and Water Use - SUPPORT Policy 5 refers to residential developments being required to minimise water consumption by meeting the optional requirement of 110 litres/per person/per day. Anglian Water and the Environment Agency and Natural England has issued advice to local planning authorities (copy attached) stating that there is evidence to demonstrate a need for optional water efficiency standard to be applied in the	Suggested changes: None.	Officer comments: Noted.

			<p>Anglian Water supply area. As such we fully support the inclusion of this standard in the policy.</p> <p>We note that changes have made to refer to water re-use measures in response to comments made by Anglian Water as part of the earlier pre-submission consultation.</p> <p>Opportunities for a more holistic and integrated approach to water management should form part of the plan, to encourage multi-functional water management assets which support other community objectives. This approach combines different elements of water management (e.g. combining SuDS with a water re-use system to both manage runoff and provide an alternative non-potable water supply) together with town planning and design (e.g. integrating the planted SuDS features throughout a development to contribute to 'greener' streetscapes).</p> <p>For the reasons set out above we fully support the reference made to development proposals incorporating water re-use measures wherever possible to reduce demand on existing water supply and impact on existing sewerage infrastructure.</p>		
<p>Representation reference: 75/1/7</p> <p>Name: Town Centre Conservation Area Advisory Committee</p>	<p>Refers to: Policy 5</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: Refurbishment of existing building stock should not simply use the same sustainable construction methods as new build, it must allow for different historic construction methods (e.g. dampproof treatments are not the same for solid wall construction) and the need to preserve and enhance character of heritage assets (e.g. replacing windows not appropriate).</p>	<p>Suggested changes: Therefore add a bullet point "For the conversion, maintenance and refurbishment of historic and traditional buildings, methods and materials will be appropriate to the age and construction of the building. This is particularly important for</p>	<p>Officer comments: Policy 31 of the LPP2 details the requirement to specifically protect designated and non-designated heritage assets. Policy 7 of the LPP2 requires development to incorporate sustainable drainage systems into designs.</p>

				<p>heritage assets (designated and non-designated).”</p> <ul style="list-style-type: none"> - Add a bullet point (all development proposals section): “Incorporate absorbent and natural external surfaces, trees and vegetation to avoid water run-off.” - In accordance with the NPPF paragraph 163c, add a bullet point: “Incorporate sustainable drainage systems, unless there is clear evidence it would be inappropriate”. 	No modification required.
<p>Representation reference: 97/1/12</p> <p>Name: Clayson Country Homes</p>	<p>Refers to: Policy 5</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: The respondent accepts the significant challenge which a changing climate poses and has no significant comments in respect of the content of Policy 5. However, there are concerns over the inclusion of water efficiency standards within the last paragraph of the Policy and in particular Part G2 of the Building Regulations, where this requirement is already covered by legislation it is considered that repetition within Policy 5 is not required and places yet a further burden on Applicants. There are also concerns over how this element of the policy will be monitored.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The Environment Agency has confirmed that the Anglian Water area is an area of water stress. As such measures to ensure reduced water consumption are required to prevent this issue from getting worse. No</p>

					modification required.
Representation reference: 148/1/15 Name: St Clair Land and Developments LLP	Refers to: Policy 4	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In respect of Policy 2, 3 and 4, it is considered that the policies could potentially contain cross reference provisions to potential future SPD's which could afford some future flexibility to the Council to allow for responses to changes in circumstances.	Suggested changes: None.	Officer comments: SPDs can be prepared in any case to provide further details on the implementation of the policies. There is no need to mention this in a policy.
Representation reference: 148/1/16 Name: St Clair Land and Developments LLP	Refers to: Policy 5	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The respondent accepts the significant challenge which a changing climate poses and has no significant comments in respect of the content of Policy 5. However, there are concerns over the inclusion of water efficiency standards within the last paragraph of the Policy and in particular Part G2 of the Building Regulations, where this requirement is already covered by legislation it is considered that repetition within Policy 5 is not required and places yet a further burden on Applicants. There are also concerns over how this element of the policy will be monitored.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 195/1/12 Name: Mr B Cheer	Refers to: Policy 5	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The respondent accepts the significant challenge which a changing climate poses and has no significant comments in respect of the content of Policy 5. However, there are concerns over the inclusion of water efficiency standards within the last paragraph of the Policy and in particular Part G2 of the Building Regulations, where this requirement is already covered by legislation it is considered that repetition within Policy 5 is not required and places yet a further burden on Applicants. There are also concerns over how this element of the policy will be monitored.	Suggested changes: None.	Officer comments: Policy 5 seeks to provide policy direction on water efficiency standards for developments within Northampton, in conformity to guidelines. Monitoring details of all policies can be

					found in Chapter 14 of the plan.
Representation reference: 200/1/38 Name: HBF	Refers to: Policy 5	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Policy 5 : Carbon Reduction, Community Energy Networks, Sustainable Design & Construction and Water Use Under Policy 5 planning applications for major development must include a Sustainability Statement setting out their approach to adaptation to climate change and carbon reduction. All development proposals should, where possible, incorporate decentralised energy networks and actively promote energy efficiency and use of renewable energy sources where there is opportunity to do so. The 2019 NPPF states that policies should be clearly written and unambiguous (para 16). The policy does not provide a clear indication as to how an applicant should prepare a planning application nor how a decision-maker should react to a development proposal.	Suggested changes: None.	Officer comments: Details of how to apply for planning permission are on the Planning Portal. No modification required.
Representation reference: 200/1/39 Name: HBF	Refers to: Policy 5	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: The Council has declared a Climate Emergency and is committed to a target of making Northampton carbon neutral by 2030 (paras 2.48 & 5.11). It is the HBF's opinion that the Council's policy approach should reflect the Government's proposals as set out in the Future Homes Standard consultation, which ended on 7th February 2020. The UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. It is the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. The Government's consultation addressed :- <ul style="list-style-type: none"> • options to uplift standards for Part L (Conservation of Fuel & Power) and changes to Part F (Ventilation) Building Regulations 	Suggested changes: None specified.	Officer comments: The Government's guidance has not yet been finalised.

			<ul style="list-style-type: none"> transitional arrangements to encourage quicker implementation ; and clarifying the role of Councils in setting energy efficiency standards. <p>The HBF's response recognises and supports the need to move to The Future Homes Standard but the Government's preferred Option 2 for a 31% reduction in carbon emissions compared to the current Part L 2013 requirements in 2020 would be difficult and risky to deliver given the immaturity of the supply chain for the production / installation of heat pumps, and the additional load that would be placed on local electricity networks when coupled with Government proposals for the installation of electric vehicle charging points (EVCP) in new homes. The HBF and its Members favour the Government's Option 1 for a 20% reduction in emissions in 2020 (involving higher fabric efficiency standards than Option 2) and then a further step to Option 2 standards by 2023, which would allow more time for the supply chain to gear up for the scale of demand entailed. The HBF submission argues that "a stepped and incremental approach should be adopted given, in particular, the large requirement for supply chain and infrastructure investment and skills training to support this ambition. The consensus is that Option 1 should be implemented within 2020, with Option 2 being implemented within two to three years in approximately 2023. Our membership sees that transitional arrangements around this implementation should be 18 – 24 months".</p>		
Representation reference: 200/1/40 Name: HBF	Refers to: Policy 5	Legal compliance and soundness: Plan is legally compliant. Plan is unsound:	Comments: It is also noted that the Council proposes incorporation of decentralised energy networks. The Council is referred to the Department for Business, Energy and Industrial Strategy consultation on Heat Networks : Building A Market Framework (ended on 1st June 2020). Currently, there are no sector specific protections for heat network consumers, unlike for	Suggested changes: None specified.	Officer comments: Policy 5 is in conformity to para 151 of the NPPF.

		<ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	<p>people on other utilities such as gas, electricity or water. Some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. These concerns should be considered by the Council.</p> <p>The Council's viability assessment excludes any costs for Future Homes Standard or the cost of connection to decentralised energy scheme. The Government's consultation estimated Future Homes Standard costs between £2,557 - £4,847 per dwelling.</p>		
<p>Representation reference: 200/1/41</p> <p>Name: HBF</p>	<p>Refers to: Policy 5</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	<p>Comments: Policy 5 also states that 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 & recycling, rainwater & stormwater harvesting and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply.</p> <p>All new dwellings achieve a mandatory level of water efficiency of 125 litres per day per person under Building Regulations, which is higher than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The WMS dated 25th March 2015 confirmed that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG". If the Council wishes to adopt the optional</p>	<p>Suggested changes: The requirement for the optional water efficiency standard is unjustified by supporting evidence. This policy requirement should be deleted.</p>	<p>Officer comments: The Anglian Water region is particularly vulnerable to the impacts of climate change and is identified as an area of serious water stress. As such the optional requirement of 110 litres / person / day is justified. No modification required.</p>

			standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the NPPG (ID 56-013 to 56-017). The NPPG refers to “helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand” however the Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The Anglian Water company area may be considered an area of water stress but Northampton Borough is only part of this wide area, the Council has provided no evidence that the Borough itself is a water stressed area.		
Representation reference: 229/1/11 Name: Barratt David Wilson Homes	Refers to: Policy 5	Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: The policy does not distinguish between residential and commercial development. Different types of development maybe able to capture different levels of carbon reduction. Whilst the policy is rather flexible in terms of what is expected in terms of carbon reduction, the ability to achieve carbon reduction can take a number of forms at varying cost. Does the policy envisage the use of a fabric first approach?	Suggested changes: None.	Officer comments: It will be for the applicant to demonstrate how the development meets the requirements of Policy 5, including details on materials. The policy applies to residential and commercial development. No modification required.
Representation reference: 229/1/12 Name:	Refers to: Policy 5	Legal compliance and soundness: Plan is not legally compliant:	Comments: Whilst the policy states “Where possible, incorporate decentralised energy networks” Ofgem rules are written as such that future occupants of buildings should have the freedom to choose their energy suppliers, albeit something	Suggested changes: Ofgem rules are written as such that future occupants of buildings should have the freedom	Officer comments: Paragraph 151 sets out that plans should: c) identify opportunities for development to

Barratt David Wilson Homes		<p>- not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	that NBC have no control over. It is worth mentioning these regulations.	to choose their energy suppliers, albeit something that NBC have no control over. It is worth mentioning these regulations.	draw its energy supply from decentralised, renewable or low carbon energy supply systems and for colocating potential heat customers and suppliers. No modification required.
Representation reference: 229/1/13 Name: Barratt David Wilson Homes	Refers to: Policy 5	Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: For the policy to be effective, in its current guise, reference to an SPD is required. The SPD would make explicit what specific detail is required in regard to the issues referenced in the policy and the LPA would be expected to be submitted in a Sustainability Statement. The SPD can also;- <ul style="list-style-type: none"> • refer to any carbon off set fund/off-site provision that would be captured through a S106 obligation • a user friendly toolkit which can calculate carbon reduction • any on-going monitoring of performance • at what stage in planning this can be addressed i.e. not through a Reserved Matters application 	Suggested changes: Modification The policy does not render the plan unsound but only with a supporting SPD which covers in depth, explicitly what is expected to be required in regards to the issues that are to be covered in a Sustainability Statement.	Officer comments: The preparation of SPDs is, by virtue of regulations, required to be linked to a policy. It is not therefore considered necessary to provide a link to any future SPDs.
Representation reference: 234/1/3 Name: Diversified Property Fund For Charities	Refers to: Policy 5	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared	Comments: Whilst it is not believed that this is their intention, the implication of these policies, as presently worded, is that a proposal for the change of use of a unit in excess of 1,000sqm would require the submission of a Sustainability Statement, Health Impact Assessment and Travel Plan. Applied to Grafton Trade Park, this could mean that a straightforward change of use application for one of the larger units (for example, to	Suggested changes: DPFC therefore suggest that these policies are amended to clarify that they apply solely to proposals for new build	Officer comments: It is important that these requirements apply to all developments because they all have impacts on sustainability, health

		<ul style="list-style-type: none"> - not justified - not effective - not consistent with national policy 	<p>allow another car rental operator within the Trade Park) would trigger the need for such burdensome documents. Such requirements would appear to be inappropriate and disproportionate for such modest changes of use and ought to be removed.</p> <p>DPFC therefore suggest that these policies are amended to clarify that they apply solely to proposals for new build floorspace over 1,000sqm and not to changes of use of existing floorspace.</p>	<p>floorspace over 1,000sqm and not to changes of use of existing floorspace.</p>	<p>and transport related matters. No modification required.</p>
<p>Representation reference: 241/1/6</p> <p>Name: British Horse Society</p>	<p>Refers to: Policy 5</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: 'Movement and access... walking and cycling' excludes equestrians. Horse riders have access to only 22% of the public rights of way network and carriage drivers to just 5%. Invariably equestrians have to use the road network to access their nearest bridleway or byway and it is important that they are able to do this safely and are provided with safe routes just as walkers and cyclists are. Including equestrians provides even better value for the public purse. Over 90% of equestrians are women and 37% of these are over 45 years of age and over a third would pursue no other physical activity (Church et al, 2010 and NHS,2019). 'Horse riding induces physiologically positive effects such as muscle strength, balance...and psychologically positive changes' (Sung et al, 2015). In the current climate mental health is hugely important and horse riding and carriage driving play a large part in enhancing physical and psychological health therefore should be included in improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel.</p>	<p>Suggested changes: In the current climate mental health is hugely important and horse riding and carriage driving play a large part in enhancing physical and psychological health therefore should be included in improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 250/1/14</p>	<p>Refers to: Policy 5</p>	<p>Legal compliance and soundness:</p>	<p>Comments: The respondent accepts the significant challenge which a changing climate poses and has no significant comments in</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The Anglian Water region is particularly</p>

<p>Name: St Clair Land and Developments LLP Old Bedford Road</p>		<p>Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>respect of the content of Policy 5. However, there are concerns over the inclusion of water efficiency standards within the last paragraph of the Policy and in particular Part G2 of the Building Regulations, where this requirement is already covered by legislation it is considered that repetition within Policy 5 is not required and places yet a further burden on Applicants. There are also concerns over how this element of the policy will be monitored</p>		<p>vulnerable to the impacts of climate change and is identified as an area of serious water stress. As such the optional requirement of 110 litres / person / day is justified. No modification required.</p>
<p>Representation reference: 251/1/12</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 5</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: Policy 5 requires that all development proposals should 'where possible, incorporate decentralised energy networks'. NPPF Paragraph 16 states that policies should be 'clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. The policy does not provide a clear indication as to how and when an applicant should demonstrate that the incorporation of decentralised energy networks is not possible.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Should an applicant not be able to incorporate a decentralised energy network, then evidence should be provided. No modification required.</p>
<p>Representation reference: 251/1/13</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 5</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: Additionally, the Council's Plan Viability Study (Aspinall Verdi, June 2020) does not include any costs for the provision of, or connection to, decentralised energy schemes. It is noted from the Future Homes Standard consultation that implementing decentralised energy schemes would add between £2,557 - £4,847 to the build-cost per dwelling. The Developers therefore object to the requirements of this policy on the basis of its viability not being tested. Should the Council wish to require the incorporation of decentralised energy networks, it is critical for its viability to be tested in the Study.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The policy has been assessed as viable.</p>

<p>Representation reference: 251/1/14</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 5</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: Policy 5 also states the following: '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.'</p> <p>In determining the standard which should be applied to new dwellings, the PPG11 confirms: 'All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.'</p> <p>Should the Council wish to adopt the higher optional standard for water efficiency of 110 litres per person per day, a clear need for this should be established based on the following, as also advised by the PPG:</p> <ul style="list-style-type: none"> • existing sources of evidence. • consultations with the local water and sewerage company, the Environment Agency and catchment partnerships. • consideration of the impact on viability and housing supply of such a requirement. <p>The Developers acknowledge that the higher optional standard has been tested through the Council's Plan Viability Study (Aspinall Verdi, June 2020) and that Anglian Water were consulted as part of the Draft Proposed Submission Consultation (June 2019). However, Anglian Water's response did not disclose any locally specific evidence to suggest whether Northampton Borough is</p>	<p>Suggested changes: The requirement for the higher water efficiency standard is unsound because it is unjustified and inconsistent with national policy. This policy requirement should be deleted.</p>	<p>Officer comments: The Anglian Water region is particularly vulnerable to the impacts of climate change and is identified as an area of serious water stress. As such the optional requirement of 110 litres / person / day is justified. No modification required.</p>
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			<p>itself an area of serious water stress; instead, its response outlined:</p> <p>'We understand that the Environment Agency considers that the area served by Anglian Water is an area of serious water stress as defined in the Environment Agency 2013 'Water stressed areas final classification report'. Therefore we would fully support the optional water efficiency standard being applied within the Northampton Local Plan area.' [Emphasis added]</p> <p>Whilst the area served by Anglian Water may be considered an area of water stress, the administrative boundary of Northampton Borough forms only part of this wide area; Anglian Water nor the Council have provided any further evidence which clearly demonstrates that the Borough itself is a water stressed area. This is supported by the PPG12 which confirms:</p> <p>'In addition to these primary data sources, locally specific evidence may also be available, for example collaborative 'water cycle studies' may have been carried out in areas of high growth.'</p>		
<p>Representation reference: 241/1/3</p> <p>Name: British Horse Society</p>	<p>Refers to: para. 5.25</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Paragraph refers to 'walking and cycling'. Horse riding (and carriage driving) are accepted in the Active Travel strategy as healthy activity.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 241/1/4</p> <p>Name: British Horse Society</p>	<p>Refers to: para. 5.25</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Paragraph refers to leisure spaces, etc however Public Rights of Way are not specifically mentioned.</p>	<p>Suggested changes: PRoW must be promoted, expanded and protected for shared user benefit.</p>	<p>Officer comments: It is agreed that the plan could be strengthened by making references to public rights of way. Modify Policy 32 accordingly.</p>

<p>Representation reference: 241/1/5</p> <p>Name: British Horse Society</p>	<p>Refers to: para. 5.28</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: 'Movement and access... walking and cycling' excludes equestrians. Horse riders have access to only 22% of the public rights of way network and carriage drivers to just 5%. Invariably equestrians have to use the road network to access their nearest bridleway or byway and it is important that they are able to do this safely and are provided with safe routes just as walkers and cyclists are. Including equestrians provides even better value for the public purse. Over 90% of equestrians are women and 37% of these are over 45 years of age and over a third would pursue no other physical activity (Church et al, 2010 and NHS,2019). 'Horse riding induces physiologically positive effects such as muscle strength, balance...and psychologically positive changes' (Sung et al, 2015). In the current climate mental health is hugely important and horse riding and carriage driving play a large part in enhancing physical and psychological health therefore should be included in improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel.</p>	<p>Suggested changes: In the current climate mental health is hugely important and horse riding and carriage driving play a large part in enhancing physical and psychological health therefore should be included in improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 57/1/1</p> <p>Name: Hardingstone Parish Council</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified</p>	<p>Comments: Whilst the document mentions the importance of Health and Wellbeing, it is felt that there is little joined up thinking. There is substantial development without the appropriate increases for GP surgeries or whether Northampton General Hospital can cope with the expanding population when both seem to be at breaking point.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The plan has been prepared using updated evidence base and also in consultation with key stakeholders who are responsible for various infrastructure provision including healthcare provision. The Infrastructure</p>

					Delivery Plan 2019 has also been used to update the requirements for infrastructure in Northampton.
<p>Representation reference: 62/1/4</p> <p>Name: Northamptonshire County Council / North Northants JPU</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: We fully support the inclusion of Policy 6 on the topic of health and wellbeing. This is clearly in alignment with NPPF and reflects the significant local health and wellbeing challenges in Northampton Borough that have been identified by the partners involved in the Northamptonshire Health and Care Partnership (https://northamptonshirehcp.co.uk/). If designed correctly, new developments can play a much greater role in supporting health and wellbeing by supporting healthier lives, rather than making them difficult to attain. This is something we definitely need to achieve to address local health and wellbeing challenges in the Borough.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 62/1/5</p> <p>Name: Northamptonshire County Council / North Northants JPU</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Health Impact Assessment The requirement to undertake Health Impact Assessments will be an effective, robust and proportionate way to ensure that planning decisions contribute to these local and national health and wellbeing policy objectives, in accordance with existing guidance. The requirement for health impact assessment will allow / enable:</p> <ul style="list-style-type: none"> • Developers / applicants to systematically identify the health and wellbeing implications of their proposals and therefore whether they are meeting relevant (national and local) planning policy requirements in relation to health and wellbeing. • Make improvements (for example in design / layout) to mitigate any negative health and wellbeing impacts 	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			<p>or maximise the positive contributions to health and wellbeing.</p> <ul style="list-style-type: none"> • The planning authority to judge the contribution the development proposals make to health and wellbeing and thus how they meet the health and wellbeing requirements of NPPF and LPP2 Policy 6. • Inform discussion / consideration of the proposals by consultees such as the local Public Health team and Clinical Commissioning Group. <p>This approach is aligned to the Planning Practice Guidance. The submitted Health Impact Assessment would inform the views / representations of health sector consultees such as the Northamptonshire Director of Public Health and the local clinical commissioning groups. It would do this by identifying any significant impact on the health and wellbeing of the local population or particular groups within it and inform consideration of whether the new development would have a significant or cumulatively significant effect on health infrastructure and/or the demand for healthcare services.</p>		
<p>Representation reference: 62/1/8</p> <p>Name: Northamptonshire County Council / North Northants JPU</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Physical activity Very simply, our population is generally not being active enough to maintain good health and wellbeing. The Northamptonshire Physical Activity & Sport Framework – More Active, More Often (https://www.northamptonshiresport.org/files/59369/northamptonshiremoreactivemoreoften-lowres-mar18.pdf) notes that we are spending significant amounts of our lives in poor health and one of the most important factors in this is that we are not being physically active enough. Achieving higher levels of active travel is likely to require significant investment in the public realm and walking and cycling infrastructure. Specific aspects that should be addressed include:</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			<ul style="list-style-type: none"> • Way marking – ensuring walking and cycling routes are clear, prominent and easily navigable. You may have good walking / cycling routes but if people cannot easily find where they are going, they are less likely to use them. • Safe and attractive – walking and cycling routes need to be appealing if they are to be used on a mass scale. Safety is a key aspect of this and should be addressed through high quality infrastructure, including cycleways that are segregated from motor vehicle traffic. • Cycle parking – needs to be prominently located, to make it accessible and genuinely appealing to use. This has the added benefit of raising the profile of cycling as a means of travel. • Places to rest / stop – for many people, particularly those with mobility issues, having places to stop and rest will be critical. 		
<p>Representation reference: 62/1/9</p> <p>Name: Northamptonshire County Council / North Northants JPU</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Social inclusion Although many people favour travel by car, a significant proportion of the population do not have access to a motor vehicle and therefore a focus on infrastructure for car travel can greatly exacerbate social inequalities. This in turn is not good for community wellbeing or the local economy.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 62/1/10</p> <p>Name: Northamptonshire County Council / North Northants JPU</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Air quality NBC has had several air quality management areas in the town centre for a number of years and I understand is considering amalgamating those into one larger town centre air quality management area. Given the amount of housing growth planned in / adjacent to Northampton and the likely levels of associated car travel, this is likely become even more of an</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The policies contained in the local plan seeks to promote sustainable travel which will contribute towards</p>

			issue. A significant change in approach to sustainable travel is likely to be required to bring air pollution levels below the statutory levels.		a reduction in air pollution levels.
<p>Representation reference: 75/1/8</p> <p>Name: Town Centre Conservation Area Advisory Committee</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: Providing access to nature improves wellbeing and can also improve health by promoting physical activity. There is a need to both provide new natural environment on site, and to provide routes to natural environment off-site. This is even more important where the development site was previously a natural environment, the development of which removes opportunities for local residents to experience nature.</p>	<p>Suggested changes: Therefore add a new bullet point: “Promoting access to the natural environment by both providing new natural environment on site, and providing routes to other natural environments nearby e.g. creation of foot-paths”.</p>	<p>Officer comments: Policy 27 of the LPP2 requires new developments to sustain and enhance existing, and support the creation of, Northampton's green infrastructure. This includes ensuring green infrastructure assets are protected, managed, maintained and connected. Additionally, new development will need to demonstrate how it improves connectivity to the Local Level Green Infrastructure network beyond the site boundary. No modification required.</p>
<p>Representation reference: 97/1/13</p> <p>Name:</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: In terms of Policy 6, whilst the justification for a rapid health impact assessment to support applications of 10 or more dwellings appears justified and reasonable. It once again places</p>	<p>Suggested changes: None.</p>	<p>Officer comments: It is a requirement of the NPPF to create places that</p>

Clayson Country Homes		Plan is sound.	further validation burdens on developers at a time when the Government's overarching intention is to simplify and streamline the planning system to ensure that the economy recovers from the impact of COVID 19. Nonetheless, whilst the need for such an assessment is accepted by the respondent, it is urged that the requirements for such an assessment, the tool for doing so and the specific requirements for such a submission should be clearly signposted within the LPP2.		are safe, inclusive and accessible and which promote health and well-being. As such proposals should demonstrate how they meet the policies with the NPPF using guidelines set out in Planning Practice Guidance.
<p>Representation reference: 113/1/20</p> <p>Name: East Hunsbury Parish Council</p>	Refers to: Policy 6	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: We do not believe the Plan to be justified by evidence or effective in dealing with Sports pitches and amenity space, specifically in relation to the following policies: Policy 6 – Health and Wellbeing, Policy 23 – Sports facilities, and playing pitches Policy 28 – Providing open space East Hunsbury is an area without sports pitches and future developments should be required to make provision for community access. There are many in our community who are, or have been, members of Welland Valley Football Club over the years, and the parish council are concerned that the location of the football pitches (off of Ladybridge Drive (Wootton Brook) is not classified as Amenity Green Space. The land has been used as pitches for a number of years and is a prime example of an area of land which should be maintained as amenity green space. The Parish Council would expect that any planning application for development of sites within East Hunsbury would include provision of open space, sports and recreation facilities, and suitable measures to ensure the maintenance of these spaces for the future. The use of management companies has created</p>	Suggested changes: None.	Officer comments: The LPP2 seeks to encourage healthy lifestyles through a variety of policies (6, 23 and 28). Policy 23 sets out that development resulting in the loss the loss of existing sports related community facilities, which is well used and valued, will only be acceptable if adequate alternative provision exists. Policy 28 of the LPP2 requires new major development to sustain or enhance open spaces, and

			an unnecessary burden for residents in other areas, and other ways of managing open space should be encouraged.		contribute to open space provision as set out in the standards in Policy 28. It is agreed that there is evidence to suggest that the area in Welland Valley FC (Off Ladybridge Drive) should be designated as Amenity Green Space. Modify the Policies Map accordingly.
Representation reference: 172/1/15 Name: Homes England	Refers to: Policy 6	Legal compliance and soundness: Plan is legally compliant. Soundness: - not specified	Comments: Homes England's Strategic Plan commits the Agency to improving design quality including through the use of Building for Life 12 (BfL12; now Building for a Healthy Life, see below) and other tools. Homes England welcomes the references to design quality and the opportunities to deliver quality design in Policies 2,3,4,6 & 7.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 172/1/20 Name: Homes England	Refers to: Policy 6	Legal compliance and soundness: Plan is legally compliant. Soundness: - not specified	Comments: As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design expectations, and how these will be tested (NPPF 2019, Paragraph 124).	Suggested changes: These should be reworded as follows: POLICY 6 - HEALTH AND WELLBEING The health and wellbeing of communities will be maintained and	Officer comments: It is agreed that a proposed modification to the plan will clarify the policy. Modify Policy 6 with to include wording in brackets []- last bullet point:

				<p>improved by requiring development to contribute to creating an age friendly, healthy and equitable living environment through:</p> <ul style="list-style-type: none"> • Creating an inclusive built and natural environment; • Promoting and facilitating active and healthy lifestyles; • Preventing negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality; • Providing access for all to health and social care facilities; and • Promoting access for all to green spaces, sports facilities, 	<p>POLICY 6 - HEALTH AND WELLBEING The health and wellbeing of communities will be maintained and improved by requiring development to contribute to creating an age friendly, healthy and equitable living environment through:</p> <ul style="list-style-type: none"> • Creating an inclusive built and natural environment; • Promoting and facilitating active and healthy lifestyles; • Preventing negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality; • Providing access for all to
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				play and recreation opportunities in accordance with the Standards set out in this plan and the Open Space, Sport and Recreation Strategy. [• Use of design tools such as Building for a Healthy Life (BHL)]	health and social care facilities; and • 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. [• Use of design tools such as Building for a Healthy Life (BHL)]
Representation reference: 195/1/13 Name: Mr B Cheer	Refers to: Policy 6	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In terms of Policy 6, whilst the justification for a rapid health impact assessment to support applications of 10 or more dwellings appears justified and reasonable. It once again places further validation burdens on developers at a time when the Government's overarching intention is to simplify and streamline the planning system to ensure that the economy recovers from the impact of COVID 19. Nonetheless, whilst the need for such an assessment is accepted by the respondent, it is urged that the requirements for such an assessment, the tool for doing so and the specific requirements for such a submission should be clearly signposted within the LPP2.	Suggested changes: None.	Officer comments: A rapid health impact assessment can be carried out using updated templates which can be obtained from the Council or the relevant public health body. It is not considered necessary to include this in the plan. No modification required.
Representation reference: 201/1/8	Refers to: Policy 6	Legal compliance and soundness:	Comments: Draft Policy 6 requires that all residential developments of 10 or more dwellings, or 1,000 or more square metres to be	Suggested changes: For these reasons, we do not consider	Officer comments: Paragraph 91 of the NPPF sets out that

<p>Name: Persimmon Homes</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>supported by a rapid Health Impact Assessment (HIA) in order to determine if a more substantial HIA is necessary. Larger developments of 100 dwellings or more will be expected to complete a more “substantial” HIA that must be submitted in support of any relevant planning applications.</p> <p>The purpose of undertaking an HIA, according to paragraph 5.29 of the supporting text, is to enable the identification and assessment of the likely effects that a proposed development will have on the health and wellbeing of the community. However, it is not clear what substantive content the Council will expect HIAs to include or in what format this should be presented. It is similarly unclear what benefit or new information undertaking these assessments will provide over and above the already extensive documentation that must accompany a planning application for major development.</p> <p>Most if not all of the factors mentioned in paragraph 5.28 as influencing healthy lifestyles are already covered by planning, design and access statements; transport statements; and Environment Statements prompted by the draft of policies that already deal with ensuring adequate living conditions, opportunities for sustainable travel and so forth.</p>	<p>that draft Policy 6 insofar as it requires the submission of HIAs is justified. We therefore OBJECT to this requirement and suggest its deletion for soundness.</p>	<p>Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</p> <p>a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or</p>
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					<p>community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. Applicants are expected to research what should be included in a Health Assessment, addressing points</p>
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					raised in the NPPF. No modification required.
<p>Representation reference: 229/1/14</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: What justification has been provided to produce a more substantial Health Assessment for 100 dwellings or more and what would this entail?</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Paragraph 91 of the NPPF sets out that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</p>

					<p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</p>
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					Applicants are expected to research what should be included in a Health Assessment, addressing points raised in the NPPF. No modification required.
<p>Representation reference: 234/1/4</p> <p>Name: Diversified Property Fund For Charities</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Whilst it is not believed that this is their intention, the implication of these policies, as presently worded, is that a proposal for the change of use of a unit in excess of 1,000sqm would require the submission of a Sustainability Statement, Health Impact Assessment and Travel Plan. Applied to Grafton Trade Park, this could mean that a straightforward change of use application for one of the larger units (for example, to allow another car rental operator within the Trade Park) would trigger the need for such burdensome documents. Such requirements would appear to be inappropriate and disproportionate for such modest changes of use and ought to be removed.</p>	<p>Suggested changes: DPFC therefore suggest that these policies are amended to clarify that they apply solely to proposals for new build floorspace over 1,000sqm and not to changes of use of existing floorspace.</p>	<p>Officer comments: It is important that these requirements apply to all developments because they all have impacts on sustainability, health and transport related matters. No modification required.</p>
<p>Representation reference: 250/1/15</p> <p>Name: St Clair Land and Developments LLP Old Bedford Road</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In terms of Policy 6, whilst the justification for a rapid health impact assessment to support applications of 10 or more dwellings appears justified and reasonable. It once again places further validation burdens on developers at a time when the Government's overarching intention is to simplify and streamline the planning system to ensure that the economy recovers from the impact of COVID 19. Nonetheless, whilst the need for such an assessment is accepted by the respondent, it is urged that the requirements for such an assessment, the tool for doing so and the specific requirements for such a submission should be clearly signposted within the LPP2.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Paragraph 91 of the NPPF sets out that Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including</p>

					<p>opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and</p>
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					<p>continual use of public areas; and c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. Applicants are expected to research what should be included in a Health Assessment, addressing points raised in the NPPF. No modification required.</p>
<p>Representation reference: 251/1/15</p> <p>Name:</p>	<p>Refers to: Policy 6</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p>Comments: Policy 6 requires the following: ‘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</p>	<p>Suggested changes: The Developers strongly disagree with this approach as it creates uncertainty and</p>	<p>Officer comments: Paragraph 91 of the NPPF sets out that Planning policies and decisions should aim to</p>

<p>Duncan Investments Ltd - Site E of Towcester Rd</p>		<p>- not justified - not effective - not consistent with national policy</p>	<p>developments, of 100 dwellings or more, will be expected to compete a more substantial health impact assessment to support their application.’</p> <p>The Developers acknowledge the need for health impact assessments as part of applications for residential development, particularly as these enable the identification of the likely effects of a proposed development on the health and wellbeing of the community.</p> <p>The policy justification makes reference to the ‘Rapid Health Impact Assessment tool’ and it is understood this relates to the Northamptonshire Rapid Health Impact Assessment Tool for Planning (August 2019). The Developers agree with this approach as its inclusion creates certainty as to the form of health impact assessment considered acceptable at the determination stage.</p> <p>However, no definition is provided for ‘a more substantial health impact assessment’ nor any criteria set outlining when the need for such an assessment is triggered.</p>	<p>risks the decision-making stage becoming unnecessarily protracted. The Developers propose that this part of the policy is amended as follows (remove words in brackets):</p> <p>‘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 compete a more substantial health impact assessment to support their application.’</p>	<p>achieve healthy, inclusive and safe places which:</p> <p>a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through</p>
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<p>Representation reference: 53/1/5</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: para. 5.34 and Policy 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: Following the publication of the previous version of the Local Plan there is new water sector guidance relating to the adoption of SuDS where they meet the legal definition of sewers, This is expected to simplify the process for developers applying to Anglian Water to adopt SuDS features.</p>	<p>Suggested changes: It is therefore suggested that the related supporting text (para 5.34) is updated to refer to Design and Construction Guidance.</p>	<p>Officer comments: It is agreed that the updated guidance should be referred to in the plan. Update paragraph 5.34 to refer to Anglian Water Sustainable Drainage Systems manual or successor documents.</p>
<p>Representation reference: 53/1/6</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: para. 5.34</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>Comments: We also note that it refers to major development proposals incorporating SuDS into the design and safeguarding access to Anglian Water's existing water and water recycling infrastructure. Policy BN7A of the adopted West Northamptonshire Core Strategy requires the incorporation of SuDS in development wherever practicable. As such it doesn't limit the use of SuDS to major development proposals. Therefore the wording as proposed is inconsistent with the Core Strategy which would be read together with Part 2 Local Plan. It is also important to emphasise that maintaining access to our existing infrastructure is essential for all development proposals and is not limited to major development proposals as suggested.</p>	<p>Suggested changes: We would therefore ask that para 5.34 is amended as follows: 'Anglian Water's SuDS adoption handbook and the water sector Design and Construction Guidance sets out the circumstances in which SuDS features will be adopted by Anglian Water'</p>	<p>Officer comments: It is agreed that the updated reference should be added to the plan. Amend 5.34 as follows: 'Anglian Water's SuDS adoption handbook and the water sector Design and Construction Guidance sets out the circumstances in which SuDS features will be adopted by Anglian Water'.</p>
<p>Representation reference: 172/1/21</p> <p>Name: Homes England</p>	<p>Refers to: para. 5.34, 5.35</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design expectations, and how these will be tested (NPPF 2019, Paragraph 124).</p>	<p>Suggested changes: Amend to include: 5.33 In addition, NCC has published its Local Standards and Guidance for</p>	<p>Officer comments: It is agreed that a proposed modification to the plan will clarify the policy. Modify the glossary to include</p>

				<p>Surface Water Drainage in Northamptonshire2</p> <p>1. 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</p>	<p>suggested wording in brackets in para 5.34.</p> <p>Add new paragraph at 5.35.</p> <p>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. [Sustainable Drainage Systems, known as SuDS are an alternative way to manage surface water by reducing or delaying rainwater run off. They aim to mimic the way rainfall drains naturally rather than conventional piped methods, which cause problems such as flooding,</p>
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				<p>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.</p> <p>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. [Sustainable Drainage Systems, known as SuDS are an alternative way to manage surface water by reducing</p>	<p>pollution or damage to the environment. Anglian Water promote the use of SuDS as a sustainable and natural way of controlling surface water run-off]. Anglian Water's SuDS Adoption handbook sets out the circumstances in which SuDS features would be adopted by Anglian Water. [5.35. SuDS should be multiuse, rather than set aside solely for the purpose of water storage; Building for a Healthy Life states that well-designed multi-functional sustainable drainage will incorporate play and recreational opportunities.]</p>
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				<p>or delaying rainwater run off. They aim to mimic the way rainfall drains naturally rather than conventional piped methods, which cause problems such as flooding, pollution or damage to the environment. Anglian Water promote the use of SuDS as a sustainable and natural way of controlling surface water run-off]. Anglian Water's SUDs Adoption handbook sets out the circumstances in which SUDs features would be adopted by Anglian Water.</p> <p>[5.35 SuDS should be multiuse, rather than set aside solely for the purpose of water storage; Building for a Healthy Life states that well-</p>	
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				designed multi-functional sustainable drainage will incorporate play and recreational opportunities.]	
<p>Representation reference: 53/1/4</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: Policy 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>Comments: Policy 7 Flood Risk and Water Management - OBJECT (in part) - EFFECTIVE We note that changes have been made to Policy 7 in response to comments made by Anglian Water and Northamptonshire County Councils as LLFA. We welcome reference made to meeting the standards for surface water as set out in documents produced both by the LLFA and Anglian Water following our previous comments on this policy.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 53/1/7</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: Policy 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>Comments: We also note that it refers to major development proposals incorporating SuDS into the design and safeguarding access to Anglian Water's existing water and water recycling infrastructure. Policy BN7A of the adopted West Northamptonshire Core Strategy requires the incorporation of SuDS in development wherever practicable. As such it doesn't limit the use of SuDS to major development proposals. Therefore the wording as proposed is inconsistent with the Core Strategy which would be read together with Part 2 Local Plan. It is also important to emphasise that maintaining access to our existing infrastructure is essential for all development proposals and is not limited to major development proposals as suggested.</p>	<p>Suggested changes: We would therefore ask that Policy 7 is amended as follows removing wording in brackets: 'For all (major) development'.</p>	<p>Officer comments: It is agreed that a proposed modification will strengthen the policy. It is recommended that Policy 7 be modified to remove wording in brackets: 'For all (major) development'.</p>

<p>Representation reference: 97/1/14</p> <p>Name: Clayson Country Homes</p>	<p>Refers to: Policy 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: The discussion of the Borough's housing land supply position, as set out within Chapter 7 is welcomed as is the acknowledgement of the acute housing land supply issues which have arisen over the past 5 years. Allied to this, the Council's acknowledgement in respect of the issues arising from the historic over reliance upon the SUE's around the town is welcomed. The production of the LPP2 will allow for complimentary growth on a range of different sites across the Borough which will serve to compliment, rather than compete with, the delivery of the larger strategic sites.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 97/1/15</p> <p>Name: Clayson Country Homes</p>	<p>Refers to: Policy 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: It is clear from Call for Sites submissions and the Council's Land Availability Assessment that the development options available within the Borough have been exhaustively considered and that there are no other sources of supply other than those which have been identified for development within the accompanying proposals map.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 113/1/3</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: We do not believe that the plan is justified by evidence or effective in dealing with the cumulative impact of proposed development sites specifically in relation to the following policies: Policy 7 – Flood risk and water management Areas of East Hunsbury have experienced serious flooding events in recent years, and the impact of further development on proposed sites will heighten the risk of further events. Proposed developments should take account of the impact on East Hunsbury as a whole and mitigation measures put in place where required. East Hunsbury Parish Council is working with Northamptonshire County Council on the Pathfinder 3 Project and the outcome of this will need to be considered for planning in the future.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 7 of the LPP2 supports proposals that assist in the management of flood risk and ensure flood risk is not increased elsewhere and provide flood risk reduction / betterment. Sustainable drainage systems must also be incorporated into</p>

					the design of all major development. Policy BN7 of the West Northamptonshire Joint Core Strategy also 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. No modification required.
Representation reference: 148/1/22 Name: St Clair Land and Developments LLP	Refers to: Policy 7	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Whilst we do not dispute the findings of the Sustainability Appraisal, it is clear that for the purposes of progressing the LPP2 suitable mitigation is built in through the inclusion of Policy 7: Flood Risk and Water Management. Any application for the future development of the site will be supported by technical information to demonstrate that successful flood risk avoidance is possible at the site and that it will not impact upon the deliverability of the site for commercial purposes.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 172/1/16	Refers to: Policy 7	Legal compliance and soundness:	Comments: Homes England's Strategic Plan commits the Agency to improving design quality including through the use of Building	Suggested changes: None.	Officer comments: Noted.

<p>Name: Homes England</p>		<p>Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>for Life 12 (BfL12; now Building for a Healthy Life, see below) and other tools. Homes England welcomes the references to design quality and the opportunities to deliver quality design in Policies 2,3,4,6 & 7.</p>		
<p>Representation reference: 172/1/22</p> <p>Name: Homes England</p>	<p>Refers to: Policy 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: As currently drafted, some of the policies and supporting text do not meet the test of soundness through inconsistency with national policy which requires plans to be clear about design expectations, and how these will be tested (NPPF 2019, Paragraph 124).</p>	<p>Suggested changes: These should be reworded as follows: POLICY 7 - FLOOD RISK AND WATER MANAGEMENT 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 	<p>Officer comments: No modification required as addressed in new paragraph 5.35.</p>

				documents) will be supported. For all development: <ul style="list-style-type: none"> Suitable access must be provided and maintained for water supply and drainage infrastructure Sustainable drainage systems must be incorporated into the design [as multi use space] 	
Representation reference: 195/1/14 Name: Mr B Cheer	Refers to: Policy 7	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The discussion of the Borough's housing land supply position, as set out within Chapter 7, is welcomed as is the acknowledgement of the acute housing land supply issues which has arisen over the past 5 years. Allied to this, the Council's acknowledgement in respect of the issues arising from the historic over reliance upon the SUE's around the town is welcomed. The production of the LPP2 will allow for complimentary growth on a range of different sites across the Borough which will serve to compliment, rather than compete with, the delivery of the larger strategic sites.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 244/1/19 Name: Bastion Group	Refers to: Policy 7	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Policy 7 Flood Risk and Water Management Bastion support the policy approach taken to incorporating SuDS into all major development. To ensure that this is consistent with national policy the policy should indicate that SuDS are required unless there is clear evidence to suggest this	Suggested changes: The policy wording should be amended as follows: For all major development:	Officer comments: Policy BN7A of the West Northamptonshire Joint Core Strategy sets out that

			is inappropriate, in accordance with paragraph 163 of the NPPF and Paragraph: 079 Reference ID: 7-079-20150415 of the Planning Practice Guidance (revised 2015). There may be some instances where SuDS are utilised but supplemented by additional drainage measures to achieve the most appropriate drainage strategy for a site.	•Sustainable drainage systems must be incorporated unless there is clear evidence to demonstrate this is not appropriate.	development should use SuDs wherever practicable. No change.
Representation reference: 23/1/5 Name: University of Northampton	Refers to: Policy 10	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: Following our comments in relation to the first Proposed Submission Version of the Local Plan in May 2019, we are pleased to see that Policy 10 (Supporting and Safeguarding the University of Northampton Waterside Campus) has been amended to refer to safeguarding the site for education and ancillary uses (previously referred to just education uses). This amendment will ensure that the policy is flexible in the event that any ancillary uses are proposed, such as retail, restaurants or healthcare. The supporting policy text also makes reference to the outline planning permission which includes 35,000 sq. m of commercial floorspace on the south eastern part of the site, which is welcomed.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 30/1/14 Name: Northamptonshire County Council	Refers to: Chapter 7	Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI	Comments: In my view elements of the plan do not meet the stated 'principle of engagement in planning' of 'engaging the community and stakeholders in the early stages of plan-making and at subsequent stages'. For example, Site 0657 (Fraser Road) is in the list of proposed allocations. In the 2017 Sites Consultation Paper, this site was indicated as 'not being taken forward for further investigation'. It then appeared as a residential allocation on the policies map for the previous local plan draft submission version consultation. I have no record of either a public or direct consultation from the council regarding changes to the site assessments. For many sites this would not be an issue but in this case the assessment for site LAA0657 states that the site 'is not in proximity to any designated	Suggested changes: None specified.	Officer comments: In July 2019, the Government introduced a new set of guidelines in terms of what constitutes a "deliverable" housing site for the purposes of plan making. This meant that the Council was required to review its development

			biodiversity or geodiversity site'. In fact the site is adjacent to Talavera East Potential Wildlife Site and within 1km of other local PWS, and Billing Arbours Local Wildlife Site. These could face increased visitor pressure – and its associated ecological impacts – as a result of residential development. While this might not have rendered site LAA0657 inappropriate for development it does suggest that other sites might have been incorrectly represented in the changes to the site assessments.		plan allocations prior to submitting it to the Planning Inspectorate. The updates were also used to inform the preparation of the Five Year Housing land Supply for 2018/19. Policy 29 of the LPP2 recognises other biodiversity assets and has been strengthened to include reference to Potential Wildlife Sites and that applicants are required to protect or enhance these.
Representation reference: 90/1/1 Name: Friends of Northampton Castle	Refers to: Chapter 7	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: FONC believes that the addition of an Heritage Impact Assessment to the evidence base has benefited the Plan, but that this has not fed through entirely to the overall plan. The aim should be to "define a positive strategy to afford appropriate protection and .. make a positive contribution to local character and distinctiveness" (Historic Environment Good Practice) not simply to add warning signs to areas of sensitivity.	Suggested changes: None.	Officer comments: The relevant recommendations from the Heritage Impact Assessment have been incorporated into the plan including strengthened policies.
Representation reference: 90/1/2 Name:	Refers to: Chapter 7	Legal compliance and soundness: Legal compliance: - not specified	Comments: The lack of a strong strategy for the Historic environment of Northampton is particularly unfortunate in respect of Northampton Castle, where there are contradictory development versus protection and enhancement demands.	Suggested changes: None.	Officer comments: The policies contained in the local plan, including those affecting

Friends of Northampton Castle		Soundness: - not specified	<p>The Northampton Forward proposals treat the Castle vicinity as town centre development opportunities, the Neighbourhood Plan for Spring Boroughs treats them as a chance to contribute to local character and distinctiveness. A strategic approach should be taking account of the whole of the Area 1 described in the HIA, including both the heritage assets on the east side of St Andrews Road and the development proposals for the Railway station and yards. There would then be an opportunity to reconcile the contradictions.</p> <p>We would argue therefore that the plan's soundness is undermined by some contradictions and the lack of an overall and effective Historic Environment strategy.</p>		Northampton Castle, have been strengthened following the publication of the Heritage Impact Assessment. Any developments affecting the areas will need to take all the relevant policies into account including the one related to the protection and enhancement of heritage assets (Policy 31).
Representation reference: 200/1/6 Name: HBF	Refers to: Chapter 7 and general	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: The WNJCS Inspector's Final Report sets out that each individual Council is responsible for its own HLS measured against the housing trajectory of the WNJCS. As of 2021, Northampton Borough Council will become part of a WN unitary authority together with Daventry District Council and South Northampton District Council. The future LHN figure and 5 YHLS will be calculated singularly for the unitary authority rather than separately and individually for each authority. The Council knowledges that housing delivery from SUEs has been weak resulting in significant housing shortfalls. Since 2011, the NRDA SUEs have not delivered as expected. The latest WNJCS joint monitoring framework demonstrates no 5 YHLS in the NRDA. A large proportion of housing land supply (HLS) in the Borough of Northampton is also located on five SUEs, which have not come forward as expected. The Northampton LPP2 deals only with housing shortfalls from the	Suggested changes: None specified.	Officer comments: The LPP2 allocates sites within Northampton Borough Council only as it cannot allocate housing sites outside of its jurisdiction. As a part of the development of the West Northamptonshire Strategic Plan, suitable housing sites in West Northamptonshire will be considered.

			<p>five SUEs located in the Borough. There are no proposed compensatory housing allocations for shortfalls across the NRDA even though the WNJCS Inspector's Final Report sets out that other sites may be part of the response to under-delivery on SUEs (see paras 198 – 200) and the monitoring provisions of adopted WNJCS Policy S6 are engaged. In this context the LPP2 is not complementary to the adopted WNJCS. The LPP2 is not a positive policy response to assisting delivery of the WNJCS and national policy.</p> <p>The WN LPP2s are not meeting housing needs nor significantly boosting housing supply. All WN authorities should be making maximum effort to allocate more housing land. The deferral of meeting housing needs to the WNSP as a review of the adopted WNJCS is unacceptable when LPP2s are capable of meeting identified housing need within the plan period to 2029. The WNSP provides no solution to the immediate and pressing need for housing. The LPP2s cannot abandon their function of delivering the WNJCS to the WNSP, which is already behind schedule. The meeting of shortfalls in delivery of identified housing needs for Northampton should be achieved through the LPP2s by the allocation of housing sites in and / or adjacent to the NRDA and / or in sustainable settlements within close proximity of the NRDA. The LPP2s should be based on effect joint working to deal with unmet needs rather than postponing resolution to a review of the WNJCS. The LPP2 is inconsistent with national policy by failing to meet the minimum housing requirements set out in the adopted WNJCS.</p>		<p>The role of the LPP2s is to deliver the requirements set out in the WNJCS. Policy S3 is clear about the delivery that each partner authorities are expected to deliver. The housing trajectory in the adopted WNJCS is heavily reliant on the delivery of the SUEs, which clearly has not materialised as expected. The decision to address Northampton's shortfall is considered to be in conformity to national guidance. The Council has undertaken an extensive Land Availability Assessment, investigating in excess of 500 sites. In determining whether the site should be allocated,</p>
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					a rigorous methodology was followed. The methodology itself was a subject of consultation in April 2016. In addition, the Council also invited landowners and prospective developers to come forward with their sites for consideration for development. In conclusion, the Council had exhausted every opportunity to identify sites for housing delivery.
<p>Representation reference: 200/1/13</p> <p>Name: HBF</p>	<p>Refers to: Chapter 7 and 5 Year Housing Land Supply</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Council's overall HLS should provide some flexibility to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market. The Council's overall proposed HLS is 22,267 dwellings comprising 5,727 completions (between 2011/12 – 2018/19), existing commitments for 4,377 dwellings, a windfall allowance of 2,400 dwellings (300 dwellings per annum), 5,959 dwellings delivered on SUEs and LPP2 housing allocations for 3,804 dwellings (see Table 6). There is an anticipated surplus of 3,394 dwellings (17.9%) between the overall HLS and the housing requirement of 18,870 dwellings. There can be no numerical formula to determine the appropriate quantum for a flexibility contingency but the Council's high dependency on five SUEs</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Northampton Borough Council passed the Housing Delivery Test. Therefore only a 5% buffer is required. The LPP2 allocates housing that exceeds this buffer to build in contingency. No modification required.</p>

			<p>means that greater numerical flexibility is necessary than in cases where HLS is more diversified. There are also other contextual matters to consider including the outdatedness of the strategic policies of the adopted WNJCS, the behind schedule progress of the WNSP, slower than anticipated housing delivery against Northampton's housing requirement on SUEs in the Borough & the NRDA and worsening housing affordability (median household income to median house price ratio of 5.1 in 2009 increasing to 7.02 in 2019). The HBF always suggests as large a contingency as possible (at least 20%), the Council's anticipated surplus is less than 20%.</p> <p>If during the LPP2 Examination, any of the Council's assumptions on lapse rates, windfall allowances and delivery rates are adjusted downwards or any proposed housing site allocations are found unsound then the surplus and any built in flexibility is reduced.</p>		
<p>Representation reference: 200/1/14</p> <p>Name: HBF</p>	<p>Refers to: Chapter 7 and General - Housing</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. The Council should re-consider the continuing likelihood of 300 dwelling per annum from windfalls where 71 sites for housing development are allocated in the LPP2 and Policy 17 safeguards all existing employment sites.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: There is a criteria in bullet point 2 of Policy 17 that allows for Change of Use. Although not specifically for housing, this is also permitted via Permitted Development.</p>
<p>Representation reference: 250/1/16</p> <p>Name:</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: The discussion of the Borough's housing land supply position, as set out within Chapter 7 is welcomed as is the acknowledgement of the acute housing land supply issues which have arisen over the past 5 years. Allied to this, the Council's acknowledgement in respect of the issues arising</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

St Clair Land and Developments LLP Old Bedford Road			from the historic over reliance upon the SUE's around the town is welcomed. The production of the LPP2 will allow for complimentary growth on a range of different sites across the Borough which will serve to compliment, rather than compete with, the delivery of the larger strategic sites.		
<p>Representation reference: 251/1/32</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	Refers to: Chapter 7	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: However, it is critical that the Council's assumptions on lapse rates, non-implementation allowances, lead-in times and delivery rates contained within its overall supply, five-year housing land supply and housing trajectory are accurate and realistic. In this regard, the Developers would be pleased to provide further information to the Council demonstrating the deliverability of residential development at Site east of Towcester Road. It is acknowledged that the land is affected by topography and will require noise mitigation measures. However, it is considered these constraints can be satisfactory accommodated through the design and layout of the scheme, particularly in the context of noise mitigation, which can be achieved through a 'buffer' to the railway and/or acoustic treatment. An Indicative Concept Masterplan for the site, enclosed at Appendix 1, has been informed by extensive technical analysis. Access is currently achieved from the Towcester Road and there is an existing track under the railway line connecting with land to the east (site ref: LAA1109). Whilst this is not currently suitable for vehicles, it has the potential to provide pedestrian and/or cycle access through to the adjoining land, which would be a significant benefit should the Collingtree SUE be extended west in the future. This would ensure connectivity in this area of Northampton, linking the SUE with the Towcester Road The site is in a sustainable location close to existing properties to the north. A bus stop is located next to the site on the</p>	Suggested changes: None.	Officer comments: Noted. The consultant refers again to the same matters but also refers to Appendix 1 which is an indicative masterplan.

			Towcester Road providing regular access into Northampton town centre.		
<p>Representation reference: 105/1/4</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: para. 7.2</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Council acknowledge that the aspirational 1,000+ new dwellings expected per annum 2014/15 to 2023/24 has “not materialised” (Local Plan Part 2, paragraph 7.2) and that “delivery of new dwellings at the SUEs has been relatively slow” (op. cit.). These points are illustrated in Table 6 and Graph 1 of the Local Plan Part 2. The Council acknowledge that not all of the dwellings to be delivered by the SUEs, will be completed before 1st April 2029. The Council’s answer to this persistent under-delivery against the WNJCS target is to allocate even more land. The Council’s original housing trajectory was informed by the economic conditions and intelligence at the time it was being progressed. On all reasonable assumptions those conditions and intelligence are now out of date and no longer reliable.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The West Northamptonshire Joint Planning Unit produces a Joint Monitoring Report which considers the rate of house building in Northampton. The NPPF (para 75) states that authorities should prepare an action plan in line with national planning guidance, to assess the causes of underdelivery and identify actions to increase delivery in future years. It has been identified that large, allocated sites are taking longer to build out and as such the LPP2 allocates smaller sites to rectify the historic underdelivery of homes. No</p>

					modification required.
<p>Representation reference: 105/1/5</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: para. 7.2</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Based on the foregoing, the Council’s strategy is flawed, being unnecessary and unwarranted. Unnecessary because there is already sufficient land to meet the WNJCS target; unwarranted because the evidence in Northampton over the past shows that the housing trajectory has been over-stated, and overly-aspirational when compared with economic intelligence. This is particularly the case with a larger site, such as The Green, Great Houghton. The Council’s strategy fails to learn from past mistakes, that larger sites (The Green is comparable in size to the smaller Sustainable Urban Extensions) are more difficult to deliver and require considerable new infrastructure. The Green at Great Houghton, by adding to the housing land supply, will create further over-supply, competing with the other larger sites for new households and infrastructure resources. The 2019 Infrastructure Delivery Plan set out that: “5.2 Funding strategic infrastructure remains a challenge. Strategic infrastructure can be delivered in a number of ways, including public sector investment (such as Central Government funding for major projects) private sector development (including developer contributions to public sector projects) and the business plans of statutory undertakers. As Government funding continues to be limited and developer contributions are still often affected by viability issues, at least in the short term, funding strategic infrastructure will remain challenging. Nevertheless, evidence shows that Northamptonshire has experienced a steady recovery following the economic downturn of 2008 and despite the economic uncertainty following the Brexit vote is well placed to thrive.” Add additional large land allocations requiring additional resources, and Covid-19, and this position only gets worse.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The West Northamptonshire Joint Planning Unit produces a Joint Monitoring Report which considers the rate of house building in Northampton. The NPPF (para 75) states that authorities should prepare an action plan in line with national planning guidance, to assess the causes of underdelivery and identify actions to increase delivery in future years. It has been identified that large, allocated sites are taking longer to build out and as such the LPP2 allocates smaller sites to rectify the historic underdelivery of homes.</p>

					Policy 37 of the LPP2 requires development proposals to contribute towards new infrastructure associated with and resulting from the scheme. No modification required.
Representation reference: 105/1/6 Name: Great Houghton Parish Council	Refers to: para. 7.2	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Having said this the Parish Council do acknowledge that given there is such a clear distinction between performance on larger sites (poorer) and smaller sites (better) that Local Plan Part 2 could and should look to offset some of the under-delivery against the WNJCS target by identifying smaller sites.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 105/1/3 Name: Great Houghton Parish Council	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: The Local Part 2 strategy is flawed, it goes beyond meeting Northampton's minimum objectively assessed need (OAN) that is set out in the West Northamptonshire Joint Core Strategy (WNJCS). The WNJCS sets a minimum OAN of 18,870, 2011-2029 (WNJCS Policy S3). The Local Plan Part 2 allocates land for 3,807 new dwellings (Table 6, Local Plan Part 2), of which 3,394 are expected to be delivered over the plan period 2011-2029, 17.98% more than is required. This includes The Green, Great Houghton. This significant oversupply is unnecessary, being unwarranted, not achievable and not sustainable.	Suggested changes: None specified.	Officer comments: The LPP2 plans for a supply of more dwellings than is required by the West Northamptonshire Joint Core Strategy. This is due to building in contingency for previous under-

			<p>Local Plan Part 2 and the Council's supporting documents (Housing Technical Paper https://www.northampton.gov.uk/downloads/file/12104/01-housing-technical-paper; and 5 year Housing Land Supply https://www.northampton.gov.uk/downloads/file/12108/04-5yhls-nbc-2019) show a consistent and significant under-performance in delivering the WNJCS minimum target: "By 1st April 2019, 5,727 dwellings had been delivered, against a JCS requirement to allocate sufficient sites (allowing for windfall) to accommodate 8,157 new dwellings in Northampton by that time. The number of dwellings delivered by 1st April 2019 falls some 2,430 units short of the delivery trajectory set out in the JCS (see Table 6)." (Local Plan Part 2, paragraph 7.1).</p>		<p>delivery on the large SUE sites in and around Northampton. Smaller sites are allocated, that will be able to come forward quicker, in case of continued SUE under-delivery. No modification required.</p>
<p>Representation reference: 200/1/17</p> <p>Name: HBF</p>	<p>Refers to: Chapter 7 and General - Housing</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The LPP2 is unsound because it is inconsistency with the adopted WNJCS by allocating insufficient land and changing the housing trajectory so that housing needs identified in the adopted WNJCS will not be met.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The LPP2 allocates housing that exceeds the required buffer to build in contingency. The Northampton Local Plan Part 2 is delivering the WNJCS. The Council's decision to amend the trajectory is in conformity to the adopted JCS. Para 5.40 of the JCS makes reference to the trajectory being updated annually as part of the Annual Monitoring Report.</p>

					Para 5.41 states that although the trajectory will be reprofiled each year, the delivery will always be compared to the base trajectory. Flexibility exists within the Plan and housing trajectory that allows for development to be brought forward to mitigate the impact of delays on individual sites. No modification required.
Representation reference: 152/1/1 Name: Buddies of Beckets	Refers to: para. 7.11 and Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I oppose building on the St Johns embankment for the following reasons: Loss of natural habitat and established trees - given the pollution levels in this area of town these trees will be contributing to lowering the CO2 levels and to lose them will have a massive impact upon an already over polluted area.	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 152/1/2 Name: Buddies of Beckets	Refers to: para. 7.11 and Policy 13	Legal compliance and soundness: Plan is legally compliant.	Comments: I oppose building on the St Johns embankment for the following reasons: Loss of natural boarder to the park, which separates Beckets Park from a petrol station and Morrisons car park - to have even more building around a park in a town	Suggested changes: None.	Officer comments: Site 1134 sits adjacent to Beckett's Park which is designated parks

		Plan is sound.	centre location will mean loss of a valuable green space. It is also well evidenced that people living next to a park often have issues with noise/ASB which will impact upon the council and police having to deal with such complaints.		and gardens. A border to the east of the site is expected to be retained as part of the site's development. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from noise.
Representation reference: 152/1/3 Name: Buddies of Beckets	Refers to: para. 7.11 and Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I oppose building on the St Johns embankment for the following reasons: Increase in traffic in already congested/polluted area.	Suggested changes: None.	Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity

					from poor air quality.
Representation reference: 152/1/4 Name: Buddies of Beckets	Refers to: para. 7.11 and Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I oppose building on the St Johns embankment for the following reasons: Competing access needs with the University and Marina - there is already an issue with competing pedestrians and vehicles in this area and bringing more residents into the area will only increase these demands and cause more tensions.	Suggested changes: None.	Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.
Representation reference: 152/1/5 Name: Buddies of Beckets	Refers to: para. 7.11 and Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I oppose building on the St Johns embankment for the following reasons: Loss of historical interest of the Northampton to Bedford railway line.	Suggested changes: None.	Officer comments: Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated heritage assets. Development will

					need to ensure that proposals demonstrate a clear understanding of the significance of the asset and justify any loss.
<p>Representation reference: 152/1/6</p> <p>Name: Buddies of Beckets</p>	<p>Refers to: para. 7.11 and Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: I oppose building on the St Johns embankment for the following reasons: How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon - it does not appear to be the easiest piece of land to access and remove a large quantity of soil and whatever else is underneath from the disused railway. This will have a massive impact upon the park users whilst this work goes on.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone a complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.</p>
<p>Representation reference: 152/1/7</p> <p>Name: Buddies of Beckets</p>	<p>Refers to: para. 7.11 and Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: I oppose building on the St Johns embankment for the following reasons: More building on flood risk area reducing ability for water to drain away naturally - on a recognised flood risk area to introduce more concreted area which will not allow water to flow away naturally will increase the risk of flooding.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction</p>

					/ betterment will be supported.
Representation reference: 220/1/1 Name: Kathleen Tomsett	Refers to: para. 7.11 and Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I object to this strip of land being built on because it would require a number of trees being felled. These trees not only soak up pollution from the significant amount of traffic but also provide habitat for birds, squirrels and other wildlife. I walk in the park virtually every day and it is a pleasure to see and hear the birds. The park is an asset and it would be appalling to destroy parts of it like this. There must be other sites locally that housing can be built on without destroying natural habitat.	Suggested changes: None.	Officer comments: A detailed site assessment has been undertaken for all the sites allocated for development. Any proposal that comes forward will need to comply with the relevant policies contained in the plan including Policy 29 (supporting and enhancing biodiversity).
Representation reference: 65/1/13 Name: English Regional Transport Association	Refers to: para. 7.11	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Housing: Since the above housing development(Site no.0333) is close to the main railway line, there should not be any housing development on that site. Moreover this could obliterate old railway track-beds. In any case the housing will encourage more road traffic, and the town's roads are frequently congested.	Suggested changes: None specified.	Officer comments: The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.
Representation reference: 219/1/1	Refers to: para. 7.11	Legal compliance and soundness:	Comments: I am not happy about the plan to get rid of the area between beckets park and Morrison's car park.	Suggested changes: None.	Officer comments: Northampton is required to deliver

<p>Name: Fiona Lungley</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>			<p>18,870 homes by 2029. Sites allocated within the LPP2 have been assessed for their suitability through the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process.</p>
<p>Representation reference: 219/1/2</p> <p>Name: Fiona Lungley</p>	<p>Refers to: para. 7.11</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: My concerns are for possible flooding! Also getting rid of all those well established trees and all that will do to the oxygen levels, pollution levels, the natural habit for wildlife that currently live there.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide</p>

					flood risk reduction / betterment will be supported Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 219/1/3 Name: Fiona Lungley	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: It's a terrible shame for those living in the area not to mention the noise it will create.	Suggested changes: None.	Officer comments: Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity including from noise and poor air quality.
Representation reference: 219/1/4 Name: Fiona Lungley	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: Beckett's park has become quite a sanctuary in recent months for employees in the area especially from the hospital for their lunch breaks etc.	Suggested changes: None.	Officer comments: The site that has been allocated sits adjacent to Beckett's Park and will not encroach onto the park.
Representation reference: 219/1/5 Name:	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant.	Comments: I also believe it will negatively effect the wildlife in Beckett's park not to mention the increase in traffic in an already over grown area that's hard to get through at the best of times.	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all major development

Fiona Lungley		Plan is unsound: - not justified - not effective			to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats. Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
Representation reference: 219/1/6 Name: Fiona Lungley	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: I believe this is a very under thought plan!	Suggested changes: None.	Officer comments: The LPP2 has been through a thorough process of evidence gathering and consultation stages since 2016 including at Issues, Options and Sites for allocation stages. Responses at all stages of

					consultation have been taken into consideration for the Submission Draft LPP2. The LPP2 also has a supporting evidence base which has informed the policies and allocations within the Plan.
Representation reference: 221/1/1 Name: Sharon Ibrahim	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Loss of natural habitat and established trees.	Suggested changes: None	Officer comments: Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 221/1/2	Refers to: para. 7.11	Legal compliance and soundness:	Comments:	Suggested changes: None	Officer comments:

<p>Name: Sharon Ibrahim</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>I have concerns around the following: Loss of natural boarder to the park, which separates Becketts Park from a petrol station and Morrisons car park.</p>		<p>Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. The site will not encroach onto the park.</p>
<p>Representation reference: 221/1/3</p> <p>Name: Sharon Ibrahim</p>	<p>Refers to: para. 7.11</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: I have concerns around the following: Increase in traffic in already congested/polluted area.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity</p>

					from poor air quality.
Representation reference: 221/1/4 Name: Sharon Ibrahim	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Competing access needs with the University and Marina.	Suggested changes: None.	Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
Representation reference: 221/1/5 Name: Sharon Ibrahim	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Loss of historical interest of the Northampton to Bedford railway line.	Suggested changes: None.	Officer comments: Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the significance of the asset and justify any loss.

<p>Representation reference: 221/1/6</p> <p>Name: Sharon Ibrahim</p>	<p>Refers to: para. 7.11</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: I have concerns around the following: How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone a complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.</p>
<p>Representation reference: 221/1/7</p> <p>Name: Sharon Ibrahim</p>	<p>Refers to: para. 7.11</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: I have concerns around the following: More building on flood risk area reducing ability for water to drain away naturally.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported</p>
<p>Representation reference: 222/1/1</p> <p>Name: Jean Thorne</p>	<p>Refers to: para. 7.11</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: The area is a haven for wildlife, I walk my dog twice a day in Becklet's Park, and there is always birdsong or other wildlife to hear and see.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of</p>

		Plan is unsound: - not justified			and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 222/1/2 Name: Jean Thorne	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: Where are the houses/flats going to have access?	Suggested changes: None.	Officer comments: Safe access to the development will need to be demonstrated at the application stage and will need to comply with Policy 33 of the LPP2.
Representation reference: 222/1/3 Name: Jean Thorne	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: There are enough cars going up and down in the park as it is!	Suggested changes: None.	Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
Representation reference: 222/1/4	Refers to: para. 7.11	Legal compliance and soundness:	Comments: What about the trees opposite?	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all

Name: Jean Thorne		Plan is legally compliant. Plan is unsound: - not justified			major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 222/1/5 Name: Jean Thorne	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: What about building on brown sites instead of destroying a small patch of land which gives people pleasure?	Suggested changes: None.	Officer comments: Northampton is required to deliver 18,870 homes by 2029. Sites allocated within the LPP2 have been assessed for their suitability through the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process. Brownfield sites are allocated within the plan but it is also necessary to allocate on greenfield sites to meet housing need.
Representation reference: 223/1/1 Name: Sue Jepson	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant. Plan is unsound:	Comments: Although this land may not be considered to be a heritage site, it has been part of the Northampton to Bedford railway line which has bordered the park for nearly 150 years. The University, together with (presumably) the Borough Council, have understood the importance of preserving the Engine Shed	Suggested changes: None suggested.	Officer comments: Policy 31 of the LPP2 requires development to protect and enhance designated

		- not justified	<p>which was part of the this line. I would therefore ask that consideration be given to see the embankment as part of this heritage.</p> <p>As it has been in situ so long, it is now covered in an enormous amount of trees, bushes, greenery and all the wildlife that exists within it. Thankfully the park is a wonderful green space in this otherwise very built up area, and surely this space should stand alongside it in the future. The destruction of so many trees would in itself be a very sad situation.</p>		<p>and non-designated heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the signifiacne of the asset and justify any loss.</p> <p>Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.</p>
<p>Representation reference: 223/1/2</p> <p>Name: Sue Jepson</p>	<p>Refers to: para. 7.11</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: It is also a well known fact that this area of the town has in past years flooded many times. Surely, more building and development in this area is not advisable. Corporations and councils in the past have boasted flood defenses but even the Environment Agency cannot guarantee these will work one hundred per cent. Sadly, the two people who died in the floods close by twenty years ago are testament to this fact.</p>	<p>Suggested changes: None suggested.</p>	<p>Officer comments: Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction</p>

					/ betterment will be supported
Representation reference: 223/1/3 Name: Sue Jepson	Refers to: para. 7.11	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: Having lived most of my life in the town, I have been sad to see in the past that not nearly enough consideration has been given to the enormous amount of history and heritage this town has to offer. We have lost so many interesting and valued buildings and areas in the past, PLEASE think carefully before any more sites disappear under concrete.	Suggested changes: None suggested.	Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 248/1/7 Name: Welland Valley Rail	Refers to: para. 7.11	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective	Comments: 11.1 Very welcome to see a high level commitment to achieve carbon neutral development by 2030.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 23/1/3 Name: University of Northampton	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: The University fully supports allocation of Park and Avenue Campuses for residential redevelopment (allocations 1013 & 1014 respectively) under emerging Policies 13 and 38. The University has now relocated to its new Waterside Campus. The University agrees that residential is the most appropriate and viable future use for the sites. Indeed, Park Campus has outline permission for the development of up to 800 homes and the initial phase is under construction. An application for residential development of Avenue Campus is with the Council for consideration.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 35/1/6	Refers to: Policy 13	Legal compliance and soundness:	Comments: Unsound.	Suggested changes:	Officer comments: Noted.

Name: Historic England		Plan is legally compliant. Plan is unsound: - not effective - not consistent with national policy		Subject to changes recommended in site specific comments.	
Representation reference: 57/1/2 Name: Hardingstone Parish Council	Refers to: Policy 13	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: There are concerns that due to the location of this site that the only access would be via the village. This would mean an increase of traffic in an area that would not be suitable. There are also concerns that this area would be subject to flooding due to natural springs in the area and the elevation of the land, currently the site takes drainage water from The Green and Heritage Farm. It is the council's understanding that development on this site has been declined in the past due to the sensitive nature of the nearby conservation area.	Suggested changes: None.	Officer comments: The site was re-assessed following consultation response to the first round of the Proposed Submission. The site has been assessed for flooding matters and was considered deliverable. Any development will have to conform with flooding policies contained in all relevant development plans and mitigation measures can be considered further when a development proposal comes forward.
Representation reference: 65/1/15	Refers to: Policy 13	Legal compliance and soundness: Legal compliance:	Comments: Housing: Since the above housing development(Site no.0333) is close to the main railway line, there should not be any housing	Suggested changes: None.	Officer comments: This site has been assessed in the Site

<p>Name: English Regional Transport Association</p>		<p>- not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>development on that site. Moreover this could obliterate old railway track-beds. In any case the housing will encourage more road traffic, and the town's roads are frequently congested.</p>		<p>Assessment Methodology and Land Availability Assessment (SAMLAA) which includes detailed investigations on matters associated with transport connections and sustainability. All development sites put forward in the Local Plan Part 2 have been modelled to assess their potential transport implications on the impact on the network.</p>
<p>Representation reference: 97/1/16</p> <p>Name: Clayson Country Homes</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In pointed response to Policy 13, the inclusion of site 1025 (Land to the west of Towcester Road) is welcomed and the content of those earlier submissions in respect of the site remain valid. The site is immediately available, suitable, sustainable, deliverable and viable for residential development purposes and is capable of being delivered within the first 5 years of the plan's adoption.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 97/1/20</p> <p>Name: Clayson Country Homes</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Turning to the site-specific allocations and policies which are addressed within Chapter 13, the respondent would first like to commend the bold approach which the Council have sought to adopt in clearly defining the significant number of development sites available within the Borough. It is considered that this approach provides landowners, including</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			those with a legal interest, absolute clarity on the potential future options for the development of their land and property interests.		
<p>Representation reference: 105/1/7</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: However, the identification of an additional larger site at The Green, is at the heart of the Council’s flawed strategy. At a time when economic conditions are weaker and resources constrained the Council should be looking to support development on already identified sites, not by unleashing further supply. With its current allocations Local Plan Part 2 seeks to bring forward an additional supply of land of 17.98% against the WNJCS target. This is unnecessary, the Council are already acknowledging persistent under- delivery; unwarranted in that it is not justified by the evidence; and not achievable. 15. The logic is flawed. What other organisation at a time of persistent under- delivery – 2,430 dwellings short of a target of 8,157 (1st April 2019), an under- performance of 29.79% would seek to increase the target by a further 17.98%. This level of over-provision will only lead to further under delivery, sites being allocated unnecessarily and, therefore, not sustainably. A much more measured approach is required, excluding the identification of further large sites and the identification, where possible, of sustainable small and medium sized sites that can be delivered in the short to medium term. In short, the Council are merely repeating past mistakes. On their own evidence larger sites have not achieved what was expected of them. But to make matters worse by allocating almost 25% of the additional housing land at one site The Green. Excluding The Green in favour of smaller sites would still lead to over-provision of 2,594 or 13.75% when compared against WNJCS target.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The NPPF sets out that where there has been a significant under-delivery of housing, a buffer should be applied to maintain the supply of housing. No modification required.</p>
<p>Representation reference: 113/1/4</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness:</p>	<p>Comments: There are 5 proposed sites in East Hunsbury: LAA110, LAA1009, LAA1142, LAA0168 and LAA1102, and a site in West Hunsbury</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone traffic</p>

<p>Name: East Hunsbury Parish Council</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>which abuts Towcester Road (LAA1025). N5 (Northampton South SUE) sits across East Hunsbury and Collingtree and has a capacity of 1,000 dwellings, although none have yet been completed. The cumulative impact of the development of these sites, and other approved developments such as the SRFI should be considered.</p> <p>The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic, and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.</p> <p>We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>		<p>modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.</p>
<p>Representation reference: 113/1/5</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: There are 5 proposed sites in East Hunsbury: LAA110, LAA1009, LAA1142, LAA0168 and LAA1102, and a site in West Hunsbury which abuts Towcester Road (LAA1025). N5 (Northampton South SUE) sits across East Hunsbury and Collingtree and has a capacity of 1,000 dwellings, although none have yet been completed. The cumulative impact of the development of these sites, and other approved developments such as the SRFI should be considered.</p> <p>The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic,</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of</p>

			and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1. We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.		growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.
<p>Representation reference: 113/1/6</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: There are 5 proposed sites in East Hunsbury: LAA110, LAA1009, LAA1142, LAA0168 and LAA1102, and a site in West Hunsbury which abuts Towcester Road (LAA1025). N5 (Northampton South SUE) sits across East Hunsbury and Collingtree and has a capacity of 1,000 dwellings, although none have yet been completed. The cumulative impact of the development of these sites, and other approved developments such as the SRFI should be considered.</p> <p>The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic, and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.</p> <p>We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development</p>

					proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.
<p>Representation reference: 113/1/7</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: There are 5 proposed sites in East Hunsbury: LAA110, LAA1009, LAA1142, LAA0168 and LAA1102, and a site in West Hunsbury which abuts Towcester Road (LAA1025). N5 (Northampton South SUE) sits across East Hunsbury and Collingtree and has a capacity of 1,000 dwellings, although none have yet been completed. The cumulative impact of the development of these sites, and other approved developments such as the SRFI should be considered.</p> <p>The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic, and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.</p> <p>We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to</p>

					sites. No modification required.
<p>Representation reference: 113/1/8</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: There are 5 proposed sites in East Hunsbury: LAA110, LAA1009, LAA1142, LAA0168 and LAA1102, and a site in West Hunsbury which abuts Towcester Road (LAA1025). N5 (Northampton South SUE) sits across East Hunsbury and Collingtree and has a capacity of 1,000 dwellings, although none have yet been completed. The cumulative impact of the development of these sites, and other approved developments such as the SRFI should be considered.</p> <p>The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic, and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.</p> <p>We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.</p>
<p>Representation reference: 113/1/9</p> <p>Name:</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: Local infrastructure, including access to doctors and schools will be impacted by the addition of a further 491 dwellings in the parish (not taking into account the SUE).</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 37 of the LPP2 requires major development proposals to</p>

East Hunsbury Parish Council		Plan is unsound: - not justified - not effective			contribute towards the delivery of and where necessary provide land / suitable sites for any new infrastructure associated with and resulting from the scheme. No modification required.
Representation reference: 113/1/10 Name: East Hunsbury Parish Council	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: Local infrastructure, including access to doctors and schools will be impacted by the addition of a further 491 dwellings in the parish (not taking into account the SUE).	Suggested changes: None.	Officer comments: Policy 37 of the LPP2 requires major development proposals to contribute towards the delivery of and where necessary provide land / suitable sites for any new infrastructure associated with and resulting from the scheme. No modification required.
Representation reference: 113/1/11 Name: East Hunsbury Parish Council	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: Local infrastructure, including access to doctors and schools will be impacted by the addition of a further 491 dwellings in the parish (not taking into account the SUE).	Suggested changes: None.	Officer comments: Policy 37 of the LPP2 requires major development proposals to contribute towards the delivery of and where necessary provide land /

					suitable sites for any new infrastructure associated with and resulting from the scheme. No modification required.
<p>Representation reference: 113/1/12</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Local infrastructure, including access to doctors and schools will be impacted by the addition of a further 491 dwellings in the parish (not taking into account the SUE).</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 37 of the LPP2 requires major development proposals to contribute towards the delivery of and where necessary provide land / suitable sites for any new infrastructure associated with and resulting from the scheme. No modification required.</p>
<p>Representation reference: 113/1/13</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Local infrastructure, including access to doctors and schools will be impacted by the addition of a further 491 dwellings in the parish (not taking into account the SUE).</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 37 of the LPP2 requires major development proposals to contribute towards the delivery of and where necessary provide land / suitable sites for any new infrastructure associated with and resulting from the</p>

					scheme. No modification required.
Representation reference: 152/1/8 Name: Buddies of Beckets	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I oppose building on the St Johns embankment for the following reasons: Loss of natural habitat and established trees - given the pollution levels in this area of town these trees will be contributing to lowering the CO2 levels and to lose them will have a massive impact upon an already over polluted area.	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 152/1/9 Name: Buddies of Beckets	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I oppose building on the St Johns embankment for the following reasons: Loss of natural boarder to the park, which separates Beckets Park from a petrol station and Morrisons car park - to have even more building around a park in a town centre location will mean loss of a valuable green space. It is also well evidenced that people living next to a park often have issues with noise/ASB which will impact upon the council and police having to deal with such complaints.	Suggested changes: None.	Officer comments: Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from noise.
Representation reference: 152/1/10	Refers to: Policy 13	Legal compliance and soundness:	Comments:	Suggested changes: None.	Officer comments: Policy 32 requires all major planning

<p>Name: Buddies of Beckets</p>		<p>Plan is legally compliant. Plan is sound.</p>	<p>I oppose building on the St Johns embankment for the following reasons: Increase in traffic in already congested/polluted area</p>		<p>applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.</p>
<p>Representation reference: 152/1/11 Name: Buddies of Beckets</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: I oppose building on the St Johns embankment for the following reasons: Competing access needs with the University and Marina - there is already an issue with competing pedestrians and vehicles in this area and bringing more residents into the area will only increase these demands and cause more tensions.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as</p>

					encouraging active lifestyles and well-being.
Representation reference: 152/1/12 Name: Buddies of Beckets	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I oppose building on the St Johns embankment for the following reasons: Loss of historical interest of the Northampton to Bedford railway line.	Suggested changes: None.	Officer comments: Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the signifiacne of the asset and justify any loss.
Representation reference: 152/1/13 Name: Buddies of Beckets	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I oppose building on the St Johns embankment for the following reasons: How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon - it does not appear to be the easiest piece of land to access and remove a large quantity of soil and whatever else is underneath from the disused railway. This will have a massive impact upon the park users whilst this work goes on.	Suggested changes: None.	Officer comments: The LPP2 has undergone a complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.

<p>Representation reference: 152/1/14</p> <p>Name: Buddies of Beckets</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: I oppose building on the St Johns embankment for the following reasons: More building on flood risk area reducing ability for water to drain away naturally - on a recognised flood risk area to introduce more concreted area which will not allow water to flow away naturally will increase the risk of flooding.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported</p>
<p>Representation reference: 152/1/15</p> <p>Name: Buddies of Beckets</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: I oppose building on the St Johns embankment for the following reasons: Loss of natural habitat and established trees - given the pollution levels in this area of town these trees will be contributing to lowering the CO2 levels and to lose them will have a massive impact upon an already over polluted area.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.</p>
<p>Representation reference: 152/1/16</p> <p>Name: Buddies of Beckets</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: I oppose building on the St Johns embankment for the following reasons: Loss of natural boarder to the park, which separates Becketts Park from a petrol station and Morrisons car park - to have even more building around a park in a town centre location will mean loss of a valuable green space. It is also well evidenced that people living next to a park often have issues with</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected</p>

			noise/ASB which will impact upon the council and police having to deal with such complaints.		to be retained as part of the site's development. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from noise.
<p>Representation reference: 152/1/17</p> <p>Name: Buddies of Beckets</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: I oppose building on the St Johns embankment for the following reasons: Increase in traffic in already congested/polluted area.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.</p>

Representation reference: 152/1/18 Name: Buddies of Beckets	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I oppose building on the St Johns embankment for the following reasons: Competing access needs with the University and Marina - there is already an issue with competing pedestrians and vehicles in this area and bringing more residents into the area will only increase these demands and cause more tensions.	Suggested changes: None.	Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
Representation reference: 152/1/19 Name: Buddies of Beckets	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I oppose building on the St Johns embankment for the following reasons: Loss of historical interest of the Northampton to Bedford railway line.	Suggested changes: None.	Officer comments: Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the significance of the asset and justify any loss.
Representation reference: 152/1/20	Refers to: Policy 13	Legal compliance and soundness:	Comments: I oppose building on the St Johns embankment for the following reasons:	Suggested changes: None.	Officer comments: The LPP2 has undergone a

Name: Buddies of Beckets		Plan is legally compliant. Plan is sound.	How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon - it does not appear to be the easiest piece of land to access and remove a large quantity of soil and whatever else is underneath from the disused railway. This will have a massive impact upon the park users whilst this work goes on.		complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.
Representation reference: 152/1/21 Name: Buddies of Beckets	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I oppose building on the St Johns embankment for the following reasons: More building on flood risk area reducing ability for water to drain away naturally - on a recognised flood risk area to introduce more concreted area which will not allow water to flow away naturally will increase the risk of flooding.	Suggested changes: None.	Officer comments: Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported.
Representation reference: 172/1/3 Name: Homes England	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Soundness: - not specified	Comments: Homes England are taking forward landholdings throughout Northampton and welcome the following sites' allocation for housing and / or housing led development in Policy 13 Residential and Other Residential Led Allocation and Policy 38 Development Allocations. Ransome Road Gateway Gate Lodge, The Green, Great Houghton, Upton Reserve Site, Ransome Road.	Suggested changes: None.	Officer comments: Noted.

<p>Representation reference: 172/1/5</p> <p>Name: Homes England</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: Homes England have undertaken work on indicative site capacity of these sites which indicate that the Dwelling Capacity in Policy 13 for a number of these sites is incorrect. As such Homes England objects to the wording of Policy 13 as currently drafted. Please see our more detailed comments on Site Specific Policies 41 & 43 for Refs 1098 & 1139. As currently drafted, the policy is too prescriptive and does not meet the test of soundness by failing to plan positively by artificially limiting sites' capacity and their ability to contribute to meeting the area's objectively assessed needs. The policy is inconsistent with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2019, Paragraph 11).</p>	<p>Suggested changes: Homes England therefore requests the following changes to Policy 13 to make the Plan sound. 1139 - Ransome Road - Indicative dwelling capacity 500 (5YHLS)</p>	<p>Officer comments: Policy 43 states that development of "at least" 200 dwellings will be required. This means that the housing capacity could be raised. There is no need to change the capacity for the site.</p>
<p>Representation reference: 185/1/10</p> <p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: We are pleased to see that the boundary of this allocation for 23 dwellings has been modified so that it no longer includes a section of Kingsthorpe Meadows Local Nature Reserve and Local Wildlife Site. Kingsthorpe Meadows already receives a high number of visitors and therefore, any additional pressure from new developments is concerning. For this allocation to be in line with Policies 27 (Green Infrastructure) and 29 (Supporting and Enhancing Biodiversity) it will need to carefully consider how it will provide a net gain in biodiversity within the application site and also contribute towards the enhancement of the wider green infrastructure in the area, including Kingsthorpe Meadows.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 185/1/12</p> <p>Name:</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: This policy has also been improved since the previous version of the Local Plan Part 2; however, it is still of concern as its potential link to the Upper Nene Valley Gravel Pits Special Protected Area (SPA) has not been established. The Habitats</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Surveys are expected to be undertaken by the applicant and will be</p>

Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire		Plan is sound.	Regulations Assessment and Policy 41 requests 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. The area suggested for ecological enhancement within the proposal (Figure 20) 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. Policy 41 also lists a range of other issues to be considered within this allocation. We would strongly recommend that the over-wintering bird surveys are carried out as soon as possible so that the importance of the allocation (as functionally linked land) to the SPA and the mitigation/compensation which may be required are clearly established and used to reassess the suitability of the allocation.		advised to undertake surveys at the outset. No change.
Representation reference: 195/1/15 Name: Mr B Cheer	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: It is clear from Call for Sites submissions and the Council's Land Availability Assessment that the development options available within the Borough have exhaustively been considered and that there are no other sources of supply other than those which have been identified for development within the accompanying proposals map. In pointed response to Policy 13, the inclusion of site 1107 (Former Abington Mill Farm, land off Rushmere Road) is welcomed and the content of those earlier submissions in respect of the site remain valid. The site is immediately available, suitable, sustainable, deliverable and viable for residential development purposes and is capable of being delivered within the first 5 years of the plan's adoption. However, it is considered that the proposed allocation should be extended to include that land, as shown in blue at Plate 1, which falls under the ownership of Northampton Borough Council.	Suggested changes: None.	Officer comments: Noted.

<p>Representation reference: 195/1/19</p> <p>Name: Mr B Cheer</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Turning to the site-specific allocations and policies which are addressed within Chapter 13, the respondent would first like to commend the bold approach which the Council have sought to adopt in clearly defining the significant number of development sites available within the Borough. It is considered that this approach provides landowners, including those with a legal interest, absolute clarity on the potential future options for the development of their land and property interests.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 200/1/7</p> <p>Name: HBF</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The LPP2 should ensure the availability of a sufficient supply of deliverable and developable land to deliver the Borough's housing requirement. This sufficiency of HLS should meet the housing requirement, ensure the maintenance of a 5 Years Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measurements. As set out in the LPP2 and the Council's Housing Technical Paper dated July 2020, 7,073 dwellings (37%) of Northampton's housing requirement of 18,870 dwellings are located on five SUEs namely N5, N6, N7, N9 and N9A. The delivery of these SUEs has been slow contributing only 80 completions between 2011/12 – 2018/19. It is no longer expected that all dwellings on SUEs will be completed before the end of plan period in 2029. It is now anticipated that completions from SUEs will total only 5,959 dwellings as opposed to circa 8,000 dwellings anticipated in the adopted WNJCS.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 200/1/8</p> <p>Name: HBF</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p>Comments: The Northampton LPP2 deals only with housing shortfalls from the five SUEs located in the Borough by proposing additional housing land allocations. The LPP2 allocates 71 housing / housing led sites for circa 3,804 dwellings as set out in Policies 13 & 38. Housing delivery is maximised, where a wide mix of</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The SAMLAA investigations concluded that 52% of sites allocated for</p>

		<ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	<p>sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. The LPP2 allocations include a wide range of sites by both size and market locations, which should provide access to suitable land for small local, medium regional and large national housebuilding companies as well as providing opportunities for a wide range of different types of dwellings to meet the housing needs of all households.</p> <p>Under the 2019 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The Council should confirm compliance with this aspect of national policy.</p>		housing are under 1 hectare.
<p>Representation reference: 200/1/10</p> <p>Name: HBF</p>	<p>Refers to: Policy 13 and general</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy </p>	<p>Comments: The HBF would not wish to comment on the merits or otherwise of individual sites selected for allocation but it is critical that the Council's assumptions on lapse rates, non-implementation allowances, lead in times and delivery rates contained within its overall HLS, 5 YHLS and housing trajectory are correct and realistic. These assumptions should be supported by parties responsible for delivery of housing and sense checked by the Council. The Council has provided limited information / supporting evidence on a site by site analysis of the deliverability of individual site allocations.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 219/1/7</p> <p>Name: Fiona Lungley</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: <ul style="list-style-type: none"> - not justified - not effective </p>	<p>Comments: I am not happy about the plan to get rid of the area between becketts park and Morrison's car park.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Northampton is required to deliver 18,870 homes by 2029. Sites allocated within the LPP2 have been assessed</p>

					for their suitability through the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process.
<p>Representation reference: 219/1/8</p> <p>Name: Fiona Lungley</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: My concerns are for possible flooding! Also getting rid of all those well established trees and all that will do to the oxygen levels, pollution levels, the natural habit for wildlife that currently live there.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported. Policy 29 of the LPP2 requires all major development</p>

					to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 219/1/9 Name: Fiona Lungley	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: It's a terrible shame for those living in the area not to mention the noise it will create.	Suggested changes: None.	Officer comments: Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity including from noise and poor air quality.
Representation reference: 219/1/10 Name: Fiona Lungley	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: Beckett's park has become quite a sanctuary in recent months for employees in the area especially from the hospital for their lunch breaks etc	Suggested changes: None.	Officer comments: The site that has been allocated sits adjacent to Beckett's Park and will not encroach onto the park.
Representation reference: 219/1/11 Name: Fiona Lungley	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: I also believe it will negatively effect the wildlife in Beckett's park not to mention the increase in traffic in an already over grown area that's hard to get through at the best of times.	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and /

					or creation of new habitats. Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
Representation reference: 219/1/12 Name: Fiona Lungley	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: I believe this is a very under thought plan!	Suggested changes: None.	Officer comments: The LPP2 has been through a thorough process of evidence gathering and consultation stages since 2016 including at Issues, Options and Sites for allocation stages. Responses at all stages of consultation have been taken into consideration for the Submission Draft LPP2. The LPP2 also has a

					supporting evidence base which has informed the policies and allocations within the Plan.
Representation reference: 219/1/13 Name: Fiona Lungley	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: I am not happy about the plan to get rid of the area between becketts park and Morrison's car park.	Suggested changes: None.	Officer comments: Northampton is required to deliver 18,870 homes by 2029. Sites allocated within the LPP2 have been assessed for their suitability through the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process.
Representation reference: 220/1/2 Name: Kathleen Tomsett	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I object to this strip of land being built on because it would require a number of trees being felled. These trees not only soak up pollution from the significant amount of traffic but also provide habitat for birds, squirrels and other wildlife. I walk in the park virtually every day and it is a pleasure to see and hear the birds. The park is an asset and it would be appalling to destroy parts of it like this. There must be other sites locally that housing can be built on without destroying natural habitat.	Suggested changes: None.	Officer comments: The Council has undertaken a robust land availability exercise which takes into consideration a number of key issues including trees. It was concluded that this site is suitable for development and there will be policies in place which will mitigate against any

					issues associated with the natural environment. Any proposal that comes forward will need to comply with the relevant policies contained in the plan including Policy 29 (supporting and enhancing biodiversity).
<p>Representation reference: 220/1/3</p> <p>Name: Kathleen Tomsett</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: I object to this strip of land being built on because it would require a number of trees being felled. These trees not only soak up pollution from the significant amount of traffic but also provide habitat for birds, squirrels and other wildlife. I walk in the park virtually every day and it is a pleasure to see and hear the birds. The park is an asset and it would be appalling to destroy parts of it like this. There must be other sites locally that housing can be built on without destroying natural habitat.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The Council has undertaken a robust land availability exercise which takes into consideration a number of key issues including trees. It was concluded that this site is suitable for development and there will be policies in place which will mitigate against any issues associated with the natural environment. Any proposal that comes forward will need to comply with the relevant policies contained in the plan including Policy</p>

					29 (supporting and enhancing biodiversity).
Representation reference: 221/1/8 Name: Sharon Ibrahim	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Loss of natural habitat and established trees.	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 221/1/9 Name: Sharon Ibrahim	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Loss of natural boarder to the park, which separates Becketts Park from a petrol station and Morrisons car park.	Suggested changes: None.	Officer comments: Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development. The site will not encroach onto the park.
Representation reference: 221/1/10 Name: Sharon Ibrahim	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Increase in traffic in already congested/polluted area.	Suggested changes: None.	Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the

					proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.
<p>Representation reference: 221/1/11</p> <p>Name: Sharon Ibrahim</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: I have concerns around the following: Competing access needs with the University and Marina.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.</p>

Representation reference: 221/1/12 Name: Sharon Ibrahim	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Loss of historical interest of the Northampton to Bedford railway line.	Suggested changes: None.	Officer comments: Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the significance of the asset and justify any loss.
Representation reference: 221/1/13 Name: Sharon Ibrahim	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon.	Suggested changes: None.	Officer comments: The LPP2 has undergone a complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.
Representation reference: 221/1/14 Name:	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant.	Comments: I have concerns around the following: More building on flood risk area reducing ability for water to drain away naturally.	Suggested changes: None.	Officer comments: Policy 7 of the LPP2 sets out the requirements for major development,

Sharon Ibrahim		Plan is unsound: - not justified			including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported.
Representation reference: 222/1/6 Name: Jean Thorne	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: The area is a haven for wildlife, I walk my dog twice a day in Becklet's Park, and there is always birdsong or other wildlife to hear and see.	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 222/1/7 Name: Jean Thorne	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: Where are the houses/flats going to have access?	Suggested changes: None.	Officer comments: Safe access to the development will need to be demonstrated at the application stage and will need to comply with Policy 33 of the LPP2.
Representation reference: 222/1/8 Name:	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant.	Comments: There are enough cars going up and down in the park as it is!	Suggested changes: None.	Officer comments: Policy 32 requires all major planning applications to

Jean Thorne		Plan is unsound: - not justified			include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
Representation reference: 222/1/9 Name: Jean Thorne	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: What about the trees opposite?	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 222/1/10 Name: Jean Thorne	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: What about building on brown sites instead of destroying a small patch of land which gives people pleasure?	Suggested changes: None.	Officer comments: Northampton is required to deliver 18,870 homes by 2029. Sites allocated within the LPP2 have been assessed for their suitability through the Sites Allocation Methodology and

					Land Availability Assessment (SAMLAA) process. Brownfield sites are allocated within the plan but it is also necessary to allocate on greenfield sites to meet housing need.
<p>Representation reference: 229/1/15</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The policy and preceding paragraphs do not place enough emphasis on the Government's objective of significantly boosting the supply of new housing. Paragraph 7.10 places an over reliance on the West Northampton Strategic Plan becoming adopted in 2022, to benchmark the housing supply targets. Fundamentally, the significant shortfall in housing supply in Northampton Borough Council, should not be parked for a plan review.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The housing target as set out in the West Northamptonshire Joint Core Strategy is expected to be delivered by the end of the Northampton LPP2 period (2029). Any new housing target set out in the West Northamptonshire Strategic Plan will enable a review of the Northampton LPP2.</p>
<p>Representation reference: 229/1/16</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p>	<p>Comments: The housing figures in NBC's Local Plan does not account for what would be predicable events, such as the Ox-Cam arc. Local Plans should account for predictable events as confirmed by the Inspector in the Aylesbury Vale Local Plan Enquiry. The full quote: "Early review Firstly, I am severely troubled by an approach which envisages that the plan will need to be reviewed soon after adoption.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The Inspector's comment on the Vale of Aylesbury LP relates particularly to the route of the Oxford to Cambridge</p>

		<p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	<p>Whilst inspectors are generally willing to find a plan sound where one or two finite issues remain unresolved and are relatively peripheral to the main thrust of the plan, it appears that the consequences of an impending government decision on the route of the Oxford Cambs expressway are expected to lead to a fundamental review of the plan's development strategy..</p> <p>Predictable events should be planned for... to be sound VALP should make contingency plans to accommodate them, not simply abandon its function to a future review of uncertain timescale</p> <p>About half of the growth expected to result from the implementation of the Ox-Cam arc is expected to take place in existing settlements, their location is, by definition existing and therefore, known. In my consideration of housing numbers I make recommendations for the plan to take account of that now. "</p> <p>The Ox-Camb arc will have an effect on housing need in the Borough, but this has not been accounted for.</p>		<p>Expressway; which is not going through Northampton. VA also identifies its own housing targets in isolation. NBC's housing targets are set out in the West Northamptonshire Joint Core Strategy. It is a matter for the review of the Core Strategy through the production of the West Northamptonshire Strategic Plan to determine housing targets that take into account growth in the OxCam Arc.</p>
<p>Representation reference: 229/1/17</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is not legally compliant:</p> <ul style="list-style-type: none"> - not compliant with duty to cooperate <p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	<p>Comments:</p> <p>Notwithstanding Policy S4 of the WNJCS, this policy should allow the ability to consider new development sites in the NDRA or adjacent to it. Using a criteria based policy that supports residential development, which is deliverable in a 5 year period, would facilitate the requirement to meet the housing needs of Northampton Borough including the planned for events, referred to earlier. In doing so, the policy would then be consistent with Paragraph 27 of the NPPF, whereby the Authority would demonstrate effective and on-going joint working, clearly addressing cross boundary matters.</p> <p>How CIL charging would be applied to such sites and what percentage of affordable housing would apply for sites in the NDRA and those adjacent to it (being considered to be rural)</p>	<p>Suggested changes: Modification Policy 13 needs significant revision rather than modification.</p>	<p>Officer comments: The NRDA encompasses land not only within NBC's boundary but also within Daventry and South Northamptonshire. The Northampton LPP2 cannot set policy or allocate sites within other districts. NBC has a CIL Charging Schedule</p>

			<p>that would be used to support Northampton Borough's housing requirements would need to be carefully considered. In some instances there is a 50% affordable housing requirement in rural sites, but only a 35% need for Northampton Borough.</p> <p>The policy is silent on what action would occur if NBC fail to meet the Housing delivery test and/or their continued inability to demonstrate a 5 year supply of deliverable housing sites. The policy needs to be explicit on the presumption, in favour and the triggering of, paragraph 11 part d) of the NPPF.</p> <p>The policy is therefore not justified, positive or effective by virtue of the overarching aims to boost housing supply and how it being silent on the effect of CIL charging.</p>		<p>which applies to development and S106 contributions are used to provide supporting infrastructure for developments. No modification required.</p>
<p>Representation reference: 232/1/8</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not "sound" (para. 35 of the NPPF), in being neither "justified" (in not being "an appropriate strategy") nor "effective" (in not being "deliverable over the Plan period"). Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites 0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.</p>	<p>Suggested changes: Would like sites 0168, 1009 and 1142 considered as 1 large site.</p>	<p>Officer comments: Agreed.</p>

<p>Representation reference: 232/1/10</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Policy 13 and policies map</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not “sound” (para. 35 of the NPPF), in being neither “justified” (in not being “an appropriate strategy”) nor “effective” (in not being “deliverable over the Plan period”). Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites 0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.</p>	<p>Suggested changes: Would like sites 0168, 1009 and 1142 considered as 1 large site.</p>	<p>Officer comments: Agreed.</p>
<p>Representation reference: 232/1/11</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Vistry and Lagan have commissioned Define to determine the housing capacity of the land between the NSSUE and the railway line, taking account of the constraints affecting that capacity (noise and air pollution from the M1 motorway; noise and vibration from the Northampton Loop Line railway; the floodplain of the Wootton Brook; hedgerows within the site; utilities easements crossing the site; and land needed for public open space, children’s play provision and surface water drainage attenuation). Assuming a suitable average net density of 40 dwellings per hectare, Define has determined that the land between the NSSUE and the railway line can accommodate some 336 dwellings.</p>	<p>Suggested changes: Consider the LPP2 indicative capacity is too high for sites LAA0168, 1009 and 1142 and that the excess should be accommodated within Northampton South SUE.</p>	<p>Officer comments: The current capacity of sites LAA0168, 1009 and 1142 in Policy 13 is indicative and not confirmed. However, as the sites is recommended to be combined, it is acceptable to change the trajectory. Modify</p>

			<p>The Council currently proposes 361 dwellings across the three sites (0168, 1009 and 1142), which would require an inappropriately high average net density of around 43 dwellings per hectare, resulting in an urban form that would be discordant with the average net density of 35 dwellings per hectare within the adjacent NSSUE. We consider that the 'excess' 25 dwellings that it is inappropriate to accommodate on sites 0168, 1009 and 1142 can and should be accommodated within the NSSUE itself, where it would be appropriate to increase the net density of housing in close proximity to its local centre and primary school above the currently permitted 35 dwellings per hectare. In this way, that area of the NSSUE close to its facilities can serve appropriately as its core.</p>		<p>the plan to take into account the revised trajectory for the combined sites.</p>
<p>Representation reference: 232/1/17</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan "justified" (appropriate), while the accommodation of the 'excess' 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both "justified" (appropriate) and "effective" (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan "effective" (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p>Suggested changes: Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p>Officer comments: The respondent commented that these sites should be combined and a revised trajectory provided. This recommendation is considered acceptable. Modify Policies 13 and 38 and the Policies Map to reflect the recommended combined sites.</p>
<p>Representation reference: 232/1/19</p> <p>Name:</p>	<p>Refers to: Policy 13 and policies map</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p>Comments: The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan "justified" (appropriate), while the accommodation of the 'excess' 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both "justified"</p>	<p>Suggested changes: Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p>Officer comments: The respondent commented that these sites should be combined and a revised trajectory</p>

Vistry Latimer Collingtree LLP		- not justified - not effective	(appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.		provided. This recommendation is considered acceptable. Modify Policies 13 and 38 and the Policies Map to reflect the recommended combined sites.
Representation reference: 233/1/8 Name: Lagan Homes	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not “sound” (para. 35 of the NPPF), in being neither “justified” (in not being “an appropriate strategy”) nor “effective” (in not being “deliverable over the Plan period”). Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites 0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.	Suggested changes: Would like sites 0168, 1009 and 1142 considered as 1 large site.	Officer comments: This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the combined sites 0168, 1009 and 1142.
Representation reference: 233/1/10 Name: Lagan Homes	Refers to: Policy 13 and policies map	Legal compliance and soundness: Plan is legally compliant. Plan is unsound:	Comments: Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not “sound” (para.	Suggested changes: Would like sites 0168, 1009 and 1142 considered as 1 large site.	Officer comments: This recommendation is considered acceptable. Modify the plan and the

		- not justified - not effective	35 of the NPPF), in being neither “justified” (in not being “an appropriate strategy”) nor “effective” (in not being “deliverable over the Plan period”). Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites 0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.		Policies Map to reflect the combined sites 0168, 1009 and 1142.
Representation reference: 233/1/11 Name: Lagan Homes	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: Vistry and Lagan have commissioned Define to determine the housing capacity of the land between the NSSUE and the railway line, taking account of the constraints affecting that capacity (noise and air pollution from the M1 motorway; noise and vibration from the Northampton Loop Line railway; the floodplain of the Wootton Brook; hedgerows within the site; utilities easements crossing the site; and land needed for public open space, children’s play provision and surface water drainage attenuation). Assuming a suitable average net density of 40 dwellings per hectare, Define has determined that the land between the NSSUE and the railway line can accommodate some 336 dwellings. The Council currently proposes 361 dwellings across the three sites (0168, 1009 and 1142), which would require an inappropriately high average net density of around 43 dwellings per hectare, resulting in an urban form that would be discordant with the average net density of 35 dwellings per hectare within the adjacent NSSUE. We consider that the ‘excess’ 25 dwellings that it is inappropriate to accommodate on sites 0168, 1009 and 1142 can and should	Suggested changes: Consider the LPP2 indicative capacity is too high for sites LAA0168, 1009 and 1142 and that the excess should be accommodated within Northampton South SUE.	Officer comments: The current capacity of sites LAA0168, 1009 and 1142 in Policy 13 is too high.

			be accommodated within the NSSUE itself, where it would be appropriate to increase the net density of housing in close proximity to its local centre and primary school above the currently permitted 35 dwellings per hectare. In this way, that area of the NSSUE close to its facilities can serve appropriately as its core.		
Representation reference: 233/1/17 Name: Lagan Homes	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	Suggested changes: Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	Officer comments: This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the combined sites 0168, 1009 and 1142.
Representation reference: 233/1/19 Name: Lagan Homes	Refers to: Policy 13 and policies map	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	Suggested changes: Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	Officer comments: This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the combined sites 0168, 1009 and 1142.
Representation reference: 243/1/4	Refers to: Policy 13	Legal compliance and soundness:	Comments: I am acting on behalf of the residents in both Cosgrove Road and Cosgrove Way. I want to give these residents a voice. Many	Suggested changes: None specified.	Officer comments: The site has been assessed through

<p>Name: Lisa Dawson</p>		<p>Plan is not legally compliant: - not in accordance with SCI - not compliant with duty to cooperate</p> <p>Plan is unsound: - not justified - not effective</p>	<p>are elderly and/or disabled so do not have access to Social media. It is unfair to think that everyone does.</p> <p>We the undersigned are objecting to the proposals to build 6 dwellings (Site Ref: 1086a - Land off Cosgrove Road (Public Open Space). We believe that the proposal will have a significant negative effect on loss of green space, loss of trees and - for many - the loss of open space. We also would like to question road access - including adequacy of parking, loading and turning together with overall traffic generation and Highway Safety.</p> <p>Residents would also like to see any risk assessments that have been carried out - particularly by the emergency services and any provision made for access subject to the plans.</p>		<p>the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process and is considered sustainable with public transport, facilities and amenities nearby. No modification required.</p>
<p>Representation reference: 244/1/3</p> <p>Name: Bastion Group</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: It should be stressed at the outset that Bastion supports the Council's overarching approach to the Local Plan Part 2 and the draft allocation at the Farm, Hardingstone. Bastion are very encouraged by the Council's approach to housing delivery and seeking to address past under- delivery in the Borough. It is reassuring that the Council has acknowledged, and is tackling, the slower than anticipated delivery at the Strategic Urban Extensions through reduced reliance on these sites and allocating more small and medium sites on which delivery is known to be consistent, helping 5-year housing land supply and supporting choice and competition as set</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Support welcomed.</p>
<p>Representation reference: 244/1/4</p> <p>Name: Bastion Group</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: It should be stressed at the outset that Bastion supports the Council's overarching approach to the Local Plan Part 2 and the draft allocation at the Farm, Hardingstone. Bastion are very encouraged by the Council's approach to housing delivery and seeking to address past under- delivery in the Borough. It is reassuring that the Council has acknowledged, and is tackling,</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Support welcomed.</p>

			the slower than anticipated delivery at the Strategic Urban Extensions through reduced reliance on these sites and allocating more small and medium sites on which delivery is known to be consistent, helping 5-year housing land supply and supporting choice and competition as set out in the National Planning Policy Framework (NPPF). This approach is vital to reinforce and maintain the Council's housing supply and maintain and strengthen the town's position in the Oxford to Cambridge Arc.		
<p>Representation reference: 244/1/14</p> <p>Name: Bastion Group</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Notwithstanding Bastion's support for the proposed allocation of Site 0204 under Policy 13 (Residential and other Residential Led Development) given its suitability, availability and deliverability for development set out above, its principal concern for the Plan in terms of 'soundness' relates to the assumed capacity of the proposed allocation in the context of the Plan's stated housing requirement and related approach to its housing delivery trajectory.</p> <p>NBC has only allocated part of the Bastion landholding but has retained the capacity that was promoted for the wider site (i.e. 100 units). It is important for the 'soundness' of the Plan to clarify this position through these representations. Having undertaken further master planning and site capacity work, Bastion can confirm that the proposed allocation 0204 can accommodate approximately 55 units. The Local Plan Part 2 needs to accurately reflect this site capacity in Policy 13 and in the associated housing delivery trajectory to ensure it remains effective and 'sound'.</p> <p>Whilst Bastion's clear and unambiguous priority is to secure this proposed allocation, particularly given its ability to pursue the site in the immediate future and facilitate rapid housing delivery at the site, it importantly notes that there is the potential to reinforce the Plan's 'soundness' by way of</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			<p>extending the allocation and increasing site capacity. The baseline technical assessment confirms that there are no constraints to the adjacent land controlled by Bastion, therefore no technical reason to preclude it from contributing towards the Plan's housing requirement.</p> <p>To assist in any consideration NBC may want to give to this additional land, Bastion has undertaken comprehensive indicative master planning across both the proposed allocation and the adjacent site to demonstrate how coordinated development could be sensitively and effectively achieved.</p> <p>Critically, Bastion do not object to the current proposed allocation but in the context of rationalising the capacity of this site, as set out above, consider that the most logical approach to reinforcing the 'soundness' of the Plan would be to extend the site boundary to include its wider landholding and thus increase the overall allocation capacity. This, however, should be without prejudice to the allocation of the current proposed allocation 0204.</p> <p>The inclusion of the adjacent land (wider site) has the potential to increase the total site capacity up to circa 100 units, subject to detailed master planning and a planning application.</p> <p>It is important to note that throughout the representations and associated supporting documentation the following references are used. For the proposed allocation (NBC reference 0204) this is known as 'draft / proposed allocation' or 'core site' and the adjacent additional land is referred to as 'wider site'.</p>		
<p>Representation reference: 244/1/20</p> <p>Name:</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: Bastion is very encouraged by NBC's current approach in relation to housing delivery and supports the position set out in the introductory text on housing delivery and current provision from page 57 onwards. It is reassuring that the Council has</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

Bastion Group		Plan is sound.	recognised the historic problems associated with an over-reliance on the large strategic urban extensions (SUE) and their slower than anticipated delivery rates. While we support the role that SUEs have in delivering comprehensive development and strategic infrastructure, it is noteworthy that they can often experience delays to commencement and slow initial delivery.		
Representation reference: 244/1/21 Name: Bastion Group	Refers to: Policy 13 and policies map	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Notwithstanding Bastion's overriding support for Policy 13 and the proposed allocation of The Farm, Hardingstone (site reference 0204), as set out above in terms of site capacity, it is important for the 'soundness' of the Plan, that the allocation accurately reflects the actual capacity of the allocated area shown by NBC on the Policies Map.	Suggested changes: To reinforce the soundness of Policy 13 and the wider Plan in terms of housing delivery, it would be necessary to amend the allocation to 55 units. To ensure the allocated area also aligns with the ownership boundary, Bastion also seek a minor refinement to the site area shown to comply with the 'Core Site' boundary shown on drawing ref: BPG005-004 Rev A.	Officer comments: It is agreed that the plan should be modified to reflect the correct capacity as supplied by the respondent which is 55 dwellings. The extended area was omitted in error. It is recommended that the site be considered when the plan is reviewed or it can come forward as a windfall site.
Representation reference: 244/1/22 Name: Bastion Group	Refers to: Policy 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Bastion do however, object to a reference in Plan which suggests that the 'Council has researched alternative sites exhaustively' and that there are no other sources of supply to address the five-year housing land supply shortfall. In the context of the necessary reduction in the current allocation at	Suggested changes: In summary, Bastion provide overarching support for Policy 13, however,	Officer comments: It is agreed that the plan should be modified to reflect the correct capacity as supplied by the

			<p>The Farm, Hardingstone, this shortfall will now be increased by circa 45 units. This is despite further land in this location being available.</p> <p>Crucially, Bastion consider that the ‘soundness’ of the Plan can be reinforced through the minor extension of the current proposed allocation at ‘The Farm’. This land is available, suitable and deliverable and has been demonstrated by the Baseline Technical Assessment and master planning to be relatively free of constraints.</p> <p>To ensure that Policy 13 remains effective and accords with national planning policy in terms of meeting local housing needs in line with Paragraphs 11 and 23 of the NPPF to ensure that there is ‘clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development’, Bastion recommend that this additional land is included within the proposed allocation to increase the capacity of the site and reflect what was anticipated in the Plan in terms of its capacity. This would help reinforce the housing requirement in a location where development has already been demonstrated and established as sustainable and deliverable.</p> <p>Bastion can confirm that this additional land can be considered deliverable in accordance with the NPPF as it is available now, offers a suitable location for development now, and is achievable with a realistic prospect that housing will be delivered on the site within five years.</p> <p>In summary, Bastion provide overarching support for Policy 13, however, recommend that to improve the soundness of the policy, Site 0204 should be amended to a capacity of 55 units. Alternatively, to ensure that overall soundness of the Plan is secured, the extent of land</p>	<p>recommend that to improve the soundness of the policy, Site 0204 should be amended to a capacity of 55 units. Alternatively, to ensure that overall soundness of the Plan is secured, the extent of land allocated could be extended to include the ‘wider site’ shown on enclosed drawing BPG005-004 rev A which would enable the site capacity to be retained.</p>	<p>respondent which is 55 dwellings. The extended area was omitted in error. It is recommended that the site be considered when the plan is reviewed or it can come forward as a windfall site.</p>
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			allocated could be extended to include the 'wider site' shown on enclosed drawing BPG005- 004 rev A which would enable the site capacity to be retained.		
<p>Representation reference: 251/1/16</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 13</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: Policy S3 of the West Northamptonshire Joint Core Strategy ('WNJCS') sets the housing requirement for Northampton Borough from 2011 to 2029 at 18,870 dwellings (1,048 dpa). As set out in the Plan and the Council's Housing Technical Paper13, 7,073 dwellings (37%) of Northampton's housing requirement of 18,870 dwellings are located on five Sustainable Urban Extensions ('SUEs'). However, the Plan confirms that delivery of these SUEs has been slow and it is therefore no longer expected that all dwellings on SUEs will be completed before the end of plan period in 202914. It is now anticipated that completions from SUEs will total only 5,959 dwellings as opposed to circa 8,000 dwellings anticipated in the adopted WNJCS. The Plan allocates 71 housing or housing-led sites for circa 3,804 dwellings as set out in Policies 13 and 38. These allocations include a wide range of sites by both size and market locations. The Developers agree with this approach as it is considered this will provide access to suitable land for small local, medium regional and large national housebuilding companies, as well as providing opportunities for a wide range of different types of dwellings to meet the housing needs of all households.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 35/1/16</p> <p>Name: Historic England</p>	<p>Refers to: Chapter 7 and evidence base</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>Comments: Whilst the evidence base is much improved, with the provision of a detailed Heritage Impact Assessment and the Battlefield Conservation Management Plan, a broader evidence base is still required to reflect heritage assets across the borough, such as including Conservation Area appraisals and Local Lists within the evidence base pages. As proposed, the evidence base</p>	<p>Suggested changes: The evidence base should be updated to include heritage in accordance with the NPPF. If the evidence is already available, please</p>	<p>Officer comments: Review how the evidence base is listed.</p>

		- not consistent with national policy	remains contrary to the NPPF, in particular paragraphs 31 and 35. Paragraph 31 states that “the preparation and review of all policies should be underpinned by relevant and up-to-date evidence.” Whilst it is accepted that S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 does not apply, specifically, to Plan making, the absence of any evaluation to address ‘uncertainty’ outcomes in the evidence base for the Plan must bring into question the deliverability of a number of those particular sites and, for some, the amount of development they can accommodate. When the requirements of the Act are eventually undertaken as part of application considerations, it may be found that the quantum of development on some of the sites is, either, unachievable or, at worst, that the need to safeguard the setting of the building actually renders them largely undevelopable.	ensure it its added into the evidence base. Particularly relevant to site and allocations and designations could include the following:- <ul style="list-style-type: none"> • Updating conservation area appraisals and including those already available within the evidence base • Undertaking characterisation studies • Local lists • Assessments of landscape sensitivit 	
Representation reference: 200/1/11 Name: HBF	Refers to: Chapter 7 and viability	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: At the plan-making stage, deliverability of development is very closely linked to viability. The viability of individual developments and plan policies should be tested at the plan making stage. Viability testing should assess the cumulative impact of affordable housing provision, policy compliant standards, infrastructure and other contributions so that there is sufficient incentive for a landowner to bring forward their land for development (2019 NPPF para 34). As stated in the 2019 NPPF, development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (para 34). The Council’s viability assessment should	Suggested changes: None specified.	Officer comments: Noted. The LPP2 has undergone a full viability assessment.

			take full account of compliance with the requirements of Policies 4, 5, 14, 29, 32, 35, 36 and 37 (see HBF representations below). Viability assessment should not be conducted on the margins of viability. As stated by the Council's viability consultants, the full economic consequences of the Covid-19 pandemic are not yet known and such uncertainty means that a larger viability buffer is necessary (ES13 & ES14). If the resultant Benchmark Land Value (BLV) is lower than the market value at which land will trade, then the delivery of housing targets will not be met. Without a robust approach to viability assessment land will be withheld from the market and housing delivery will be threatened, leading to an unsound LPP2 and housing delivery targets not being met. Viability assessment is an iterative process, in low / middle value areas "trade-offs" between affordable housing provision, CIL, S106 contributions and compliance with policy requirements may be necessary. At Examination, viability will be a key issue in determining the soundness of the Northampton LPP2.		
Representation reference: 200/1/12 Name: HBF	Refers to: Chapter 7 and viability	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: It is noted that the Plan Viability Study by Aspinall Verdi dated June 2020 identifies that brownfield sites in higher value area zone are less viable than greenfield sites (para 5.39), brownfield sites in the lower value zone are on the margins of viability (para 5.42), all apartment developments on brownfield sites (5.44) and specialist housing developments for the over 55's (para 6.8) are unviable on a full policy compliant basis. The Council has not provided any detailed information on the split between brownfield / greenfield site allocations, the location of brownfield / greenfield sites in lower / higher value areas zones or the quantum of development on brownfield / greenfield site allocations. There is reference to a large number of allocations around the town centre in the lower value area (para 5.2). Of the typologies tested circa 50% of sites are brownfield (para 5.8 – 5.13). If viability negotiations	Suggested changes: None specified.	Officer comments: Noted.

			are required, this could impact on the timely delivery of housing.		
<p>Representation reference: 219/1/14</p> <p>Name: Fiona Lungley</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: My concerns are for possible flooding! Also getting rid of all those well established trees and all that will do to the oxygen levels, pollution levels, the natural habit for wildlife that currently live there</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Site 1134 is not designated as green space, therefore no loss of greenspace would occur. Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased elsewhere, provide flood risk reduction / betterment will be supported Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.</p>

Representation reference: 219/1/15 Name: Fiona Lungley	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: It's a terrible shame for those living in the area not to mention the noise it will create.	Suggested changes: None.	Officer comments: Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity including from noise and poor air quality.
Representation reference: 219/1/16 Name: Fiona Lungley	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: Beckett's park has become quite a sanctuary in recent months for employees in the area especially from the hospital for their lunch breaks etc.	Suggested changes: None.	Officer comments: The site that has been allocated sits adjacent to Beckett's Park and will not encroach onto the park.
Representation reference: 219/1/17 Name: Fiona Lungley	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: I also believe it will negatively effect the wildlife in Beckett's park not to mention the increase in traffic in an already over grown area that's hard to get through at the best of times.	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats. Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the

					proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
<p>Representation reference: 219/1/18</p> <p>Name: Fiona Lungley</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: I believe this is a very under thought plan!</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has been through a thorough process of evidence gathering and consultation stages since 2016 including at Issues, Options and Sites for allocation stages. Responses at all stages of consultation have been taken into consideration for the Submission Draft LPP2. The LPP2 also has a supporting evidence base which has informed the policies and allocations within the Plan.</p>

Representation reference: 221/1/15 Name: Sharon Ibrahim	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Loss of natural habitat and established trees.	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 221/1/16 Name: Sharon Ibrahim	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Loss of natural boarder to the park, which separates Becketts Park from a petrol station and Morrisons car park.	Suggested changes: None.	Officer comments: Site 1134 sits adjacent to Beckett's Park which is designated parks and gardens. A border to the east of the site is expected to be retained as part of the site's development.
Representation reference: 221/1/17 Name: Sharon Ibrahim	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Increase in traffic in already congested/polluted area.	Suggested changes: None.	Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design

					principles such as encouraging active lifestyles and well-being. Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.
Representation reference: 221/1/18 Name: Sharon Ibrahim	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Competing access needs with the University and Marina.	Suggested changes: None.	Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate, demonstrate and achieve design principles such as encouraging active lifestyles and well-being
Representation reference: 221/1/19 Name: Sharon Ibrahim	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: Loss of historical interest of the Northampton to Bedford railway line.	Suggested changes: None.	Officer comments: Policy 31 of the LPP2 requires development to protect and enhance designated and non-designated

					heritage assets. Development will need to ensure that proposals demonstrate a clear understanding of the significance of the asset and justify any loss.
Representation reference: 221/1/20 Name: Sharon Ibrahim	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: How viable the land is under an old railway line and the level of disturbance to the area in making this visible to build upon.	Suggested changes: None.	Officer comments: The LPP2 has undergone a complete viability appraisal and has been found to be viable. Any construction works will need to consider the impact on the users of the park; this would be dealt with through condition at the application stage.
Representation reference: 221/1/21 Name: Sharon Ibrahim	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I have concerns around the following: More building on flood risk area reducing ability for water to drain away naturally.	Suggested changes: None.	Officer comments: Policy 7 of the LPP2 sets out the requirements for major development, including the need to incorporate sustainable drainage systems. Proposals that ensure flood risk is not increased

					elsewhere, provide flood risk reduction / betterment will be supported.
Representation reference: 222/1/11 Name: Jean Thorne	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: The area is a haven for wildlife, I walk my dog twice a day in Becklet's Park, and there is always birdsong or other wildlife to hear and see.	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 222/1/12 Name: Jean Thorne	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: Where are the houses/flats going to have access?	Suggested changes: None.	Officer comments: Policy 33 requires developments to provide safe and suitable access which will need to be demonstrated at the planning application stage.
Representation reference: 222/1/13 Name: Jean Thorne	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: There are enough cars going up and down in the park as it is!	Suggested changes: None.	Officer comments: Policy 32 requires all major planning applications to include a Travel Plan to demonstrate they can mitigate the proposal's transport impact. It will also need to be designed to incorporate,

					demonstrate and achieve design principles such as encouraging active lifestyles and well-being.
Representation reference: 222/1/14 Name: Jean Thorne	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: What about the trees opposite?	Suggested changes: None.	Officer comments: Policy 29 of the LPP2 requires all major development to offset the loss of and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats.
Representation reference: 222/1/15 Name: Jean Thorne	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: What about building on brown sites instead of destroying a small patch of land which gives people pleasure?	Suggested changes: None.	Officer comments: Northampton is required to deliver 18,870 homes by 2029. Sites allocated within the LPP2 have been assessed for their suitability through the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) process. Brownfield sites are allocated within the plan but it is also necessary to

					allocate on greenfield sites to meet housing need.
<p>Representation reference: 228/1/3</p> <p>Name: David Russell</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - reason not specified</p> <p>Plan is unsound: - not consistent with national policy</p>	<p>Comments: The Former Abington Mill Farm, land of Rushmere Road is regularly flooded and even listed at medium and high risk on the local county council land. I'm concerned as a resident who lives close to this land that work here may merely move the flood risk to areas next to this with my house and my neighbours very close by.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The site was considered for development allocation following a land availability assessment which took into account the land's potential for flooding. Any development proposals will need to conform with flood related policies in the Local Plan and implement, if necessary, flood mitigation measures.</p>
<p>Representation reference: 228/1/4</p> <p>Name: David Russell</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - reason not specified</p> <p>Plan is unsound: - not consistent with national policy</p>	<p>Comments: I'm also concerned about access to this planned area. Rushmere road is extremely busy morning and evenings and this added amount of housing with likely only one way in and out is only going to add to that.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Any proposals that come forward will need to comply with the relevant policies on highways safety and sustainable travel. The Highways authority will also be consulted on any proposals that are submitted through the development</p>

					management process.
<p>Representation reference: 231/1/3</p> <p>Name: Sally Brannan</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective</p>	<p>Comments: We wish to formally object to the Local Plan Part 2 in relation to the planned inclusion of development LAA1107 – Former Abington Mill Farm, land off Rushmere road. Change of Council Policy The development would be contrary to the previous plan to preserve the river valley for Recreational/Leisure use as stated in the 1997 plan. This restricted the use of the riverside landscape and stated “Development for any other use will not be permitted” This was part of the council policy to safeguard the Nene Valley and Tributaries.</p> <p>The previous plan stated “in order to enhance and maintain the value which the river valley affords, it is essential that these open spaces remain undeveloped” – What has changed?</p>	<p>Suggested changes: None.</p>	<p>Officer comments: National planning guidelines have changed since the previous plan was developed. Housing requirements have also changed and new evidence has been commissioned to inform the Local Plan (Part 2).</p>
<p>Representation reference: 231/1/4</p> <p>Name: Sally Brannan</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective</p>	<p>Comments: Traffic We currently experience a high volume of traffic on Rushmere road, as this is the main road from town leading to the Barnes Meadow Roundabout which is one of the busiest roundabouts in the county. The Bedford Road roundabout links the Brackmills Industrial Estate, dual carriageway (A45) motorway (M1) and Bedford Road. To build a 125 house development at this location and to build a further housing estate will impact this massively, resulting in even further delays/tailbacks to all roads at peak times, specifically up/down Rushmere Road which is often gridlocked stretching back to the Billing Road/Park Ave South Junction. A development of 125 dwelling would lead to around an additional 162 vehicles being forced with no alternative onto the Rushmere Road (Based on a UK average car ownership of 1.3 vehicles per household, excluding London) These 125 households would also have visitors, deliveries etc which would further impact on the amount of</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Traffic modelling has been undertaken by Northamptonshire County Council on behalf of the borough for all development allocations in the Local Plan Part 2.</p>

			<p>vehicles using the Rushmere Road. The Bedford Road roundabout was remodelled in 2019, to take into consideration the additional amount of traffic, which still causes issues of backlog, and rushing to navigate the two lanes that merge into one.</p> <ul style="list-style-type: none"> • The proposed entry to the site would be on a bend which would be a hazard to both traffic coming down and up Rushmere Road, and has the potential of being an accident black spot. The potential for the entrance is very limited, due to the river, and path to Brackmills • On match days at the Old Scouts Rugby Club, the parking is already an issue that we face on Rushmere Road and Tanfield Lane. Having a further entry and exit point on, an already busy part, will be a further hazard • The proposed development is within 50m of the A45 and the site proposed would be likely to become an AQMA area similar to other plots placed in similar locations. • Due to the location and natural barriers to movement such as the A45 and the River this would make the use of a car an almost certainty for all travel to and from the estate. 		
<p>Representation reference: 231/1/5</p> <p>Name: Sally Brannan</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective</p>	<p>Comments: Wildlife/Natural Environment/Open Space</p> <ul style="list-style-type: none"> • The area of land in question currently has a large amount of wildlife living within. Erecting a housing development will damage the wildlife currently within it. The majority of the site is within the 250m Upper Nene Gravel Pits Special Protection Area. The land should be preserved, it is home to a wide variety of wildlife including bats (seen frequently flying), Minks etc. The land is also currently home to large electricity pylons. • Flooding 	<p>Suggested changes: None.</p>	<p>Officer comments: There are policies in the plan which seek to protect and enhance the natural environment and the biodiversity within it. Each site proposed for development in the Local Plan Part 2 has been assessed</p>

			<ul style="list-style-type: none"> • A number of residents of Tanfield Lane have lived here since the houses were built, and on numerous occasions we have seen the location prone to flooding. Whilst the floods are not heavy, the land does get water logged. Further development will increase the risk of flooding to our properties. • Size of Proposal • In Tanfield Lane we have 89 houses, in a larger size plot than the one being proposed. The size of the development means the houses will be packed in, and there will be overcrowding and more vehicles. 		against its flood potential and policy requirements stipulate that developments do not increase flood risk elsewhere. This could be through mechanisms such as Sustainable Drainage Systems (SuDS).
Representation reference: 231/1/6 Name: Sally Brannan	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective	Comments: Heritage The land is clearly Greenfield land and has been identified as having archaeological potential. There is a scatter of medieval pottery with the potential for more items of interest.	Suggested changes: None.	Officer comments: Statutory consultees on heritage, such as Historic England and the county archaeologist, have been consulted. Future applications will require further details to be submitted regarding how development will respond to existing heritage. Any proposals must be in conformity with policies contained in the Local Plan Part 2.
Representation reference: 231/1/8 Name: Sally Brannan	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant.	Comments: To summarise on balance this planned development should be removed from the current local plan as it is clearly unsuitable for development for a vast number of reasons listed about. The local community oppose this development and should this be	Suggested changes: None.	Officer comments: Noted. The site has been investigated using a robust land availability

		Plan is unsound: - not positively prepared - not justified - not effective	included in the plan and not withdraw we will fight the proposal using all methods available to us including seeking a judicial review, appeals and we will also make contact with appropriate conservation groups for wildlife, waterways and other appropriate groups such as extinction rebellion.		assessment. No modification required.
Representation reference: 232/1/3 Name: Vistry Latimer Collingtree LLP	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: Vistry controls sites 1009 and 1142; and welcomes their proposed allocation for residential development in the draft Plan. Site 0168 is controlled by Lagan, with whom Vistry is collaborating as an adjacent landowner. Both Vistry and Lagan welcome the proposed allocation of that site for residential development in the draft Plan.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 232/1/4 Name: Vistry Latimer Collingtree LLP	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: Vistry controls sites 1009 and 1142; and welcomes their proposed allocation for residential development in the draft Plan. Site 0168 is controlled by Lagan, with whom Vistry is collaborating as an adjacent landowner. Both Vistry and Lagan welcome the proposed allocation of that site for residential development in the draft Plan.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 232/1/5 Name: Vistry Latimer Collingtree LLP	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north. Prospective residents of the three sites would increase the catchment population of local retail and community facilities at the local centre for the NSSUE, increasing the prospect of their delivery and retention; and enhancing footfall and vibrancy in that local centre.	Suggested changes: None.	Officer comments: Noted.

Representation reference: 232/1/6 Name: Vistry Latimer Collingtree LLP	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north. Prospective residents of the three sites would increase the catchment population of local retail and community facilities at the local centre for the NSSUE, increasing the prospect of their delivery and retention; and enhancing footfall and vibrancy in that local centre.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 232/1/7 Name: Vistry Latimer Collingtree LLP	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north. Prospective residents of the three sites would increase the catchment population of local retail and community facilities at the local centre for the NSSUE, increasing the prospect of their delivery and retention; and enhancing footfall and vibrancy in that local centre.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 233/1/3 Name: Lagan Homes	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: Vistry controls sites 1009 and 1142; and welcomes their proposed allocation for residential development in the draft Plan. Site 0168 is controlled by Lagan, with whom Vistry is collaborating as an adjacent landowner. Both Vistry and Lagan welcome the proposed allocation of that site for residential development in the draft Plan.	Suggested changes: None.	Officer comments: Noted.

Representation reference: 233/1/4 Name: Lagan Homes	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: Vistry controls sites 1009 and 1142; and welcomes their proposed allocation for residential development in the draft Plan. Site 0168 is controlled by Lagan, with whom Vistry is collaborating as an adjacent landowner. Both Vistry and Lagan welcome the proposed allocation of that site for residential development in the draft Plan.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 233/1/5 Name: Lagan Homes	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 233/1/6 Name: Lagan Homes	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 233/1/7 Name: Lagan Homes	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: The development of all three sites (0168, 1009 and 1142) would be an eminently appropriate westerly extension of the NSSUE, extending that development as far west as the clear physical boundary of the Northampton Loop Line railway, while remaining within the confines of the M1 motorway to the south and the floodplain of the Wootton Brook to the north.	Suggested changes: None.	Officer comments: Noted.

<p>Representation reference: 235/1/3</p> <p>Name: Jane Evans</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: The privately owned field in question includes the eastern end of the old flood canal (built in 1926) and Abington Mill Lock, built in the 18th century and situated close to the junction of the flood canal with the old course of the river Nene. Local residents north of the old river, whose gardens back on to the river bank, have seen on the site numerous animals and birds, including muntjac deer. Bats, grass snakes, newts, wildfowl, herons, kingfisher and otters. The latter two are protected by the Wildlife and Countryside Act 1981. Kingfishers are one of the species for which 'it is an offence to intentionally or recklessly disturb at, on or near an active nest'. Regarding otters, 'it is illegal to intentionally or recklessly disturb any otter while it is occupying a structure or place which it uses for shelter or protection'. (Schedule 1, Part 1)</p> <p>The Wildlife Trust BCN notes in their comments on the Draft Local Plan Habitats Regulations that an up-to-date survey has not yet been prepared. (Appendix E, LUC 189, 2nd para.) This is a Local Wildlife Site which should clearly be protected from development. In fact, the Local Plan of 1997 designated this area (by the old course of the river Nene) as associated with Policy L17 which relates to leisure use in association with the river. The Plan stated, 'In order to enhance and maintain the value which the river valley affords, it is essential that these open spaces remain undeveloped'. There is no reason to change the truth of this statement. In fact climate change and the dangers to biodiversity make the statement even more valid today than 23 years ago.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 235/1/4</p> <p>Name: Jane Evans</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: The current Draft Local Plan Policy 29, Supporting and Enhancing Biodiversity, (p. 98) states that 'all major new development proposals (should) offset the loss and secure a net gain in biodiversity through the strengthening,</p>	<p>Suggested changes: None.</p>	<p>Officer comments: All housing sites in the LPP2 have been assessed in the Site Assessment</p>

		Plan is unsound: - not justified	management and / or creation of new habitats ... Development should avoid fragmentation of habitats and links, and address the Northamptonshire Biodiversity Action Plan local priorities for habitats and species'. The site in question here lies between an old orchard and Abington Meadows Nature Reserve to the east and Barnes Meadow Nature Reserve to the west , providing a link in the chain of habitats.		Methodology and Land Availability Assessment which considers all matters relating to the natural environment as one of its areas of investigation.
Representation reference: 235/1/5 Name: Jane Evans	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: This green space is further protected by the West Northamptonshire Joint Core Strategy (WNJCS) (p. 113): The design of the Nene Valley Nature Improvement Area will help develop the next phase of environment improvements along the Nene Valley landscape , enhancing and reconnecting nature on a significant scale.' With this Strategy in mind, the inclusion of site LAA 1107 is illogical and ill thought out. Policy BNS, The River Nene Strategic River Corridor, in the WNJCS (p. 131) further states that 'the natural and cultural environment of the Nene Corridor through the Plan area, including its tributaries , will be enhanced and protected in recognition of its important contribution to the area's green infrastructure network'.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 235/1/6 Name: Jane Evans	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: There is also the obstacle presented by the close proximity of the Washlands RAMSAR site of international significance . The Wildlife Trust BCN has already expressed concern that local residents who walk round the Washlands are disturbing the birds in the Special Protection Area. (Draft Local Plan Habitats Regulations, Appendix E. LUC 189, 2nd para.). A further 125 households nearby will only add to the problem. The Draft Plan calls for a mitigation strategy, but there seems little likelihood of any strategy being effective in this case.	Suggested changes: None.	Officer comments: There are policies in place in the Local Plan Part 2 and the West Northamptonshire Joint Core Strategy which seek to secure the protection of the SPA. Policy 30 of the LPP2 will be modified to confirm

					its commitment to the preparation of a Mitigation Strategy.
Representation reference: 235/1/7 Name: Jane Evans	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: While discussing the nature of this Local Wildlife Site it is useful to mention the issue of heritage. Abington Mill Lock was financed by Sir Frederick Montagu MP in about 1760 when the river Nene was being made navigable down to the North Sea. There was a monument stone erected on the island by the lock, commemorating his generosity. If it is not still there, it may now be in the Northampton Museum. Rendering the river navigable was an important part of Northampton's history and economic development. The site of the Mill could be a heritage asset comparable to Clifford Hill Lock (funded by Spencer Compton MP), where an information panel explains the history. We would hope the Northampton Borough Council (NBC) would have the vision to see the importance of marking the course of the old river and the now derelict lock. In fact the Draft Local Plan (Chap. 10, para. 10.27) supports this vision: 'The natural and man-made 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 ... Collectively these provide a diverse assembly of green spaces which contribute to Northampton's local character and sense of place.'	Suggested changes: None.	Officer comments: Noted.
Representation reference: 235/1/8 Name: Jane Evans	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: The second factor in our objection is the issue of traffic. Road access to the development is via the Rushmere Road. The situation is bad at present without the addition of another 125 households. Another group of residents has already explained this issue in their own Representation, so we shall not go into much detail. At peak times congestion causes queues in both directions between the Barnes Meadow roundabout and the traffic lights at the top of Rushmere Road. One Tanfield Lane	Suggested changes: None.	Officer comments: Traffic modelling has been undertaken by Northamptonshire County Council on behalf of the borough on all sites proposed for

			<p>resident has said that it can take ten minutes to pull out on to the Rushmere Road at peak times . Another access road further down from Tanfield Lane would make matters worse. Added to which, the proposed entry is on a bend where visibility is obscured. We appreciate that the Draft Local Plan requires a developer to provide a mitigating Traffic Plan, but we cannot see how this severe problem of congestion and safety can be solved. Again it seems illogical to include site LAA 1107 in the list of sites for development .</p> <p>The WNJCS Policy C2, New Developments , (p. 67, para. 6.3) states that 'new developments that do not make walking and cycling easy are a reason for Northamptonshire traffic growth being higher than the national average... (para. 6.7) Need to locate development where people can access facilities such as retail, education and employment without using the car.' The new development in question would be very isolated - the only road access being at the bottom of the Rushmere Road which is about a quarter of a mile of steep hill. It is highly likely that all travel would be by car.</p>		allocation in the LPP2.
<p>Representation reference: 235/1/10</p> <p>Name: Jane Evans</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments:</p> <p>The third issue is the flood risk. The Environment Agency's flood prediction website (flood-warning-information.service.gov.uk) says that a significant area of the site in question is at medium to low risk of flooding. Many local residents have pointed out that over several decades they have seen flooding or waterlogging in the field here. We appreciate that developers must provide a flood risk assessment that sets out mitigation measures , but in the present situation of climate change it seems particularly foolhardy to risk building on this flood plain.</p> <p>One local resident , Robert Fulllove of 26 Tanfield Lane , has said that an underground watercourse runs from somewhere near the road bridge , eastwards parallel to the flood canal. It</p>	<p>Suggested changes: None.</p>	<p>Officer comments: A Strategic Flood Risk Assessment has been conducted for Northampton and development is directed away from areas of highest risk. Furthermore, all development proposed in the LPP2 has been investigated using a robust land</p>

			<p>is only visible in winter and is clearly visible by the contrasting colour of the grass . Any disturbance by contractors' activities would upset the natural order of drainage . The derelict Abington Mill Lock serves the useful purpose of allowing flood water to tumble over from the old course of the river .</p> <p>The NPPF (p. 44 , para . 19) warns Councils that 'plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implication for flood risk'. Site LAA 1107 is surrounded in the north by estates which could be impacted by flooding caused by further building.</p>		availability assessment process.
<p>Representation reference: 235/1/11</p> <p>Name: Jane Evans</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: It seems extraordinary to us that in the Sites Allocation Methodology and Land Availability Assessment (SAMLAA) (p. 314) the flood risk in LAA 1107 is suggested to be minimal. One important fact which was brought to our attention is that house insurance would not be granted because the site is on a flood plain.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The information used to investigate the sites were from sources such as the Environment Agency. The EA did not have any objections to this allocation.</p>
<p>Representation reference: 235/1/12</p> <p>Name: Jane Evans</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: The fourth problem is the distance of the site from local amenities . Another group of residents has already analysed in their Representation the positive and negative scoring given in the Sustainability Appraisal , so we do not wish to repeat their arguments . They point out that the site is three kilometres from the nearest co-ed secondary school. (The School for Boys only accepts girls in the 6th form.) The site is also 500 metres from the primary school, 1 km from local shops , and over 1 km from a GP surgery.</p> <p>In the WNJ CS , Policy INF 1 (p. 113, para . 11.9) states that 'new development will be supported by and provide access to</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Every new development brought forward in the LPP2 has been assessed by the Site Assessment Methodology and Land Availability Assessment to take into account a variety of considerations</p>

			in frastruct ure, including phys ical , green and social element s. It will integrate with and complement adjoining communities'. Site LAA 1107 is very isolated in this respect from its adjoining communit ies .		including local amenities.
Representation reference: 235/1/13 Name: Jane Evans	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: <p>The fifth issue relates to soil contamination and soil instability. The estate on Tanfield Lane north of the site was built on the site of a tannery where the soil was contaminated by anthrax. The developers had to remove the contaminated soil and import unaffected soil. One resident, Robert Fullilove of 26 Tanfield Lane, who has lived on the Lane since it was built, has told us that the original Health and Safety report stated that the ground should never again be disturbed. It is possible that the soil on Abington Mill Farm is also contaminated. The SAMLAA acknowledges this fact (p. 314).</p> <p>The same resident explains that the soil is unstable: the land between the flood canal and the A45 is made up of spoil and redundant fill from the building of the A45 and the re-routing of the river Nene. 'In geotechnica/ terms the make-up of this material is still "loose" - in other words unstable , and therefore any building foundation would almost certainly have to sit on piles. This would require a pile driver banging away all day, or as and when the contractor required.' The NPPF (p. 49, para . 170e) requires Councils to prevent 'new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability'.</p>	Suggested changes: None.	Officer comments: Noted. Further investigation of the ground conditions of the site will be undertaken at the detailed application stage.
Representation reference: 235/1/14 Name: Jane Evans	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound:	Comments: This brings us to the final factor in our Representation: air and noise pollution. The Sustainability Appraisal (p. 315) makes light of the low air quality and noise involved for the residents of any houses built on Abington Mill Farm, scoring them as 'a minor negative'. The site is adjacent to the very busy three lane	Suggested changes: None.	Officer comments: Noted. Further investigation of the air quality of the site will be undertaken

		- not justified	section of the A45, and the noise is very loud. The site would very likely become an Air Quality Management Area (AQMA), as has a similar location further west along the A45 . There is no way to mitigate this risk. The NPPF (p. 52, para. 180a) requires Councils to 'avoid noise (in new developments) giving rise to significant adverse impacts on health and the quality of life'.		at the detailed application stage.
Representation reference: 235/1/15 Name: Jane Evans	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: Something positive could then perhaps emerge from this, if NBC were to undertake the transformation of this land into a public space where Northampton residents could enjoy the wildlife and learn about the heritage of the town.	Suggested changes: None specified.	Officer comments: Any masterplan for this site should mitigate against the impacts of development upon surrounding wildlife.
Representation reference: 244/1/6 Name: Bastion Group	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: As Bastion has reinforced in its previous representations into the Local Plan Part 2 and the WNSP, its land at The Farm, Hardingstone (both the proposed allocation site and the land immediately to the north) is capable of not only providing a cohesive extension to the village but also being a suitable, deliverable and achievable site and sustainable development in accordance with guidance provided in the NPPF and Planning Practice Guidance. It would be a high quality, integrated development in a sustainable location with it being located adjacent to Hardingstone Village, the emerging Sustainable Urban Extension (SUE) on land east of Hardingstone and Brackmills Industrial Estate. These locational factors were all instrumental in the Secretary of State allowing an appeal in April 2016 for up to 1,000 dwellings and related development on adjacent land for the SUE (APP/V2825/A/14/2228866). Bastion's land holding is within walking distance of existing amenities, schools, employment and frequent bus services. It is worth noting that both Secretary of State and the Inspector saw the SUE's proximity to Brackmills Industrial Estate as a	Suggested changes: None.	Officer comments: Noted.

			substantial benefit in the site's sustainability credentials and would improve the operation of Brackmills Industrial Estate by creating a labour pool nearby thereby reducing the need to travel to work by car, minimising travel distances, avoiding long-distance commuting and restricting carbon emissions.		
Representation reference: 244/1/7 Name: Bastion Group	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Having now also recently undertaken a baseline technical assessment across the whole landholding including examining transport, drainage, ground conditions, heritage, landscape and ecology considerations, Bastion is in a position to confirm that the site is largely unconstrained. This reinforces the site's deliverability and feasibility to be brought forward for residential development in a timely manner and indicates that there are no factors that would impede the ability or the viability of the site from coming forward for development, as set out in the Plan. The baseline technical assessment covers both the proposed allocation, and in light of the fact that the additional land to the north had the potential to further support and help facilitate the allocated site, and possibly provide some modest further growth, this has also been included in the assessment. The baseline reports also help address queries, comments and concerns highlighted in previous assessments of the site undertaken by NBC and in the current Sustainability Appraisal and SAMLAA. A summary of key issues is set out below and this further helps demonstrate how any minor constraints can be addressed through appropriate design and mitigation as part of the development of the site.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 244/1/8 Name: Bastion Group	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant.	Comments: The submitted Transport Topic Paper examines the key transport, access and highway considerations for the site and proposed development, and confirms that site is very well located to facilitate pedestrian and cycle trips to many key	Suggested changes: Noted.	Officer comments: Noted.

		Plan is sound.	<p>destinations, including to Northampton town centre, by way of the existing and developing local cycle and walking network. The site is also within easy walking distance of existing bus stops served by an hourly service or better. It therefore ideally positioned to encourage and facilitate sustainable modes of travel.</p> <p>Furthermore, the transport work undertaken indicates that vehicular access to the site is straightforward through the improvement of an existing access. The required improvements can be achieved using land in the site promoters' control or which is adopted public highway. The potential trip rates for the scale of the allocation means it is unlikely to have a material impact on the operation of the local or wider highway network. Any minor impact could be mitigated through minor improvement works, if deemed necessary through undertaking a Transport Assessment as part of any future planning application.</p>		
<p>Representation reference: 244/1/9</p> <p>Name: Bastion Group</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: The Ecological Technical Note submitted with the representations includes the findings of an Extended Phase 1 Survey undertaken in August 2020 and identifies the likely ecological constraints on the site and the need for further surveys, as well as preliminary indications of potential mitigation. This concludes that, subject to the necessary surveys being undertaken and mitigation implemented, there are no significant ecological constraints to bringing the site forward for residential development. Early engagement with Natural England and the Council will help determine appropriate mitigation in relation to the Nene Gravel Pits Special Protection Area and ecological measures within the site, including retention and enhancement of particular hedgerows, mature trees and other boundary features, will help minimise habitat losses.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

<p>Representation reference: 244/1/10</p> <p>Name: Bastion Group</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments:</p> <p>Cultural heritage has been identified as a potential constraint by NBC as part of the assessment of the site through the Local Plan process. A Heritage Assessment, undertaken in August 2020, is submitted in support of the representations and has informed the early illustrative layout work. The site has been assessed from a cultural heritage perspective to identify any constraints and opportunities and in terms of archaeological assets, the evidence to date derived from the HER, LiDAR data and other relevant sources does not suggest the presence of currently unrecorded archaeological remains on the site of a significance that would prohibit or constrain development. In respect of build heritage, the site makes some positive contribution to settings of both Pittam’s Farmhouse and the Hardingstone Conservation Area, therefore it may be necessary to preserve these aspects of setting through any potential development. Due to the topography of the study site and the historic development of Hardingstone, the area which most strongly contributes to the setting of both the Conservation Area and particularly Pittam’s Farmhouse and its associated buildings is located to the west of the study site. This is considered and accommodated in the emerging illustrative layout. It is considered that the site can be developed in a way which can respond to the setting of the Hardingstone Conservation Area and the heritage assets within it. Green infrastructure will be retained on the western edge of the site to maintain the immediate rural setting of the Conservation Area, with the roads and buildings aligned to retain, in whole or part, the views into and out of the Area. The exact nature of these views and the built form within the study site will be subject to the detailed design process.</p> <p>Therefore, with appropriate mitigation measures in place, it is considered that heritage assets do not present a constraint upon the allocation of the site for residential development.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
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<p>Representation reference: 244/1/11</p> <p>Name: Bastion Group</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Landscape</p> <p>A Landscape and Visual Appraisal Note has been prepared and is submitted in support of the representations and has informed the initial illustrative layout. The appraisal undertaken demonstrates that there will be no notable long-term effects as a result of the proposals, and that the site could be accommodated into its context without unacceptable effects. The initial illustrative layout has sought to maintain and enhance the site boundaries to help provide further containment and will incorporate green infrastructure throughout the development, aligned with ecological and drainage requirements, to help further integrate the site into its wider context. Therefore, from a preliminary landscape and visual perspective it is not considered that the site presents any significant constraints that cannot be mitigated.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 244/1/12</p> <p>Name: Bastion Group</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Flood Risk and Drainage</p> <p>An initial review of flood risk and drainage options for the site is presented in the submitted Technical Note and this demonstrates the technical deliverability of drainage solutions for the residential development of the site. The site lies within Flood Zone 1 and thus per NPPF guidelines all types of development including residential are suitable for the site. There is a minimal risk of overland/surface water flooding. The risk of overland flooding is minimal due to the relatively small size of the upstream catchment, the presence of highway drainage within The Green and the greenfield land type immediately south of the site and thus the risk of onsite surface water flooding appears to be caused through onsite retention of rainfall which can be mitigated through reprofiling/a proposed drainage strategy for the proposed</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			<p>development. Mitigation measures incorporated into any future development will reduce the potential impact of flooding within the site and the surrounding area and the development will provide benefits regarding flood risk in comparison to existing conditions.</p> <p>A sustainable drainage solution can be achieved for the site which is likely to include onsite attenuation and discharge to an existing watercourse. As well as accommodating an effective drainage solution, it will provide amenity, landscape and potentially ecological value and will help reduce flood risk onsite and offsite. Therefore, there are no significant flood risk or drainage constraints to the development of the site.</p>		
<p>Representation reference: 244/1/13</p> <p>Name: Bastion Group</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Ground Conditions</p> <p>A Preliminary Contamination Risk Assessment has been undertaken and examines the ground conditions and any potential environmental or ground-related risks associated with the development of the site. The assessment indicates that risk from ground instability is low to very low or does not present a hazard at all. From a contamination perspective, any potential moderate risks are limited to those associated with the agricultural buildings in the southern corner of the site, albeit these are isolated and can be mitigated / remediated. There are therefore, no significant ground conditions constraints associated with the site (neither the proposed allocation or the wider site).</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 244/1/15</p> <p>Name: Bastion Group</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: As Bastion has sole control over the total area of the proposed allocation and additional land within the wider site it is able to bring forward a planning application for residential development as soon as possible in line with the Plan-making process to expedite the delivery of new homes. The land is</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			<p>clearly available, suitable, achievable and deliverable (Paragraph 47 of the NPPF) and the design principles of the Plan can be accommodated in bringing forward the site.</p> <p>The comments made in relation to site capacity and the adjacent land do not have any impact on the deliverability and availability of the proposed allocation.</p>		
<p>Representation reference: 244/1/16</p> <p>Name: Bastion Group</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: As noted above, and to demonstrate that a coordinated design approach can be achieved, as well as to help inform indicative capacity testing, indicative master planning has been undertaken and is submitted with these representations. We hope that this will provide reassurance to NBC and the Inspector that the site is deliverable, can achieve key design and sustainability objectives and, if beneficial to the soundness of the Plan, can provide for additional land to increase housing delivery and meet the quantum indicated in the Plan.</p> <p>Whilst further master planning work will be undertaken as technical assessment of the site is progressed, as part of the Plan-making process and to support a subsequent planning application, this early concept plan and illustrative master plan are presented at this stage to reinforce deliverability and indicate the key design principles that will inform proposals going forward.</p> <p>Bastion are in a position to progress with a planning application for this site within the next 12 months (both proposed allocation and, if there is a positive policy framework in place, for the adjacent land). This will align with the site's position in the housing trajectory and will ensure it can contribute to NBC's 5 Year Housing Land Supply.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The additional land was inadvertently omitted during the land availability assessment process. Additional land can be allocated when the plan is updated or can come forward as a windfall site.</p>

<p>Representation reference: 244/1/27</p> <p>Name: Bastion Group</p>	<p>Refers to: Chapter 7 and policies map</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In light of the position set out above in respect of the capacity of the wider site and supporting the overall soundness of the housing requirement to be achieved by the Plan, without prejudice to the existing allocation, Bastion suggest that allocation 0204 is reviewed in terms of the extent of land included and shown on the policies map. These representations clearly demonstrate the suitability, availability and deliverability of the wider Bastion landholding for residential development and recommend that the whole landholding, including the 'wider site', as shown on Plan BPG005-004 A, should be allocated and the policies map amended accordingly.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The extended area was omitted in error. It is recommended that the site be considered when the plan is reviewed or it can come forward as a windfall site.</p>
<p>Representation reference: 244/1/28</p> <p>Name: Bastion Group</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Bastion support the general conclusions of the SAMLAA and the resulting recommendation for the allocation of the site. It is not however clear from the audit trail associated with this document or the wider Local Plan evidence base why the 'wider site' under the control of Bastion, and promoted through the Plan process, has not also been considered and appears to have been discounted from assessment. These representations clearly indicate that this wider site is available and suitable for development and therefore should be considered. Notwithstanding Bastion's position and recommendations set out above in respect of the wider site and its potential allocation to further support NBC's housing numbers and as well as the development of the proposed allocation 0204, the current exclusion of this land means that there are incorrect assertions regarding the capacity of site 0204. The site shown in the SAMLAA is considerably smaller than Bastion's original submission yet the site capacity of 100 units has been retained. The 100 unit capacity is reliant on the reinstatement of the wider site, and in the absence of this additional land, the capacity would need to be reduced.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The extended area was omitted in error. It is recommended that the site be considered when the plan is reviewed or it can come forward as a windfall site.</p>

			<p>From a technical perspective, there are concerns raised regarding land stability, ecology and heritage. As is set out above, none of these represent any significant constraints to the development of the site and the assessment should be revisited and scores amended to reflect this position.</p> <p>Bastion also provide reassurance that the land-owner confirms the site (both the proposed allocation and potential wider site) is available for delivery. This therefore should not be presented in the SAMLAA as an uncertainty to the site's suitability.</p>		
<p>Representation reference: 247/1/3</p> <p>Name: Bellway Homes</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: The site known as 'Land North of Milton Ham, Northampton' is allocated in the proposed submission version of the Local Plan (Policies 13 and 38) – site reference: 1140 for 224 dwellings. We note that the site capacity has been calculated using the developable area percentage (80% for sites of 0.4ha – 10ha) and density (40dph) as set out in the Council's Sites Allocation Methodology and Land Availability Assessment (SAMLAA) (June 2020).</p> <p>Bellway Homes supports the proposed housing allocation on this site.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 247/1/10</p> <p>Name: Bellway Homes</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In terms of the Council's SAMLAA, the only additional comment Bellway Homes wishes to make, relates to 'Access', which is rated as 'amber'. To confirm, Bellway Homes are in the process of investigating this position further through the necessary technical work, and will update the Council in due course in support of this proposed housing allocation.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 248/1/14</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p>	<p>Comments: Heavy rail reinstatement would likely need grade separation of the former level crossing at London Road - requiring an embankment to elevate the railway line, which might encroach</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

Name: Welland Valley Rail		Plan is unsound: - not effective	a few but vital metres onto site LAA1139. Likewise it may also be necessary to lower the current highway 1-2m at the level crossing location, which would effect surrounding site access onto the highway.		
Representation reference: 248/1/15 Name: Welland Valley Rail	Refers to: Chapter 7	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective	Comments: Heavy rail reinstatement would likely need grade separation of the former level crossing at London Road - requiring an embankment to elevate the railway line, which might encroach a few but vital metres onto site LAA1139. Likewise it may also be necessary to lower the current highway 1-2m at the level crossing location, which would effect surrounding site access onto the highway.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 248/1/16 Name: Welland Valley Rail	Refers to: Chapter 7	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective	Comments: Heavy rail reinstatement would likely need grade separation of the former level crossing at London Road - requiring an embankment to elevate the railway line, which might encroach a few but vital metres onto site LAA1139. Likewise it may also be necessary to lower the current highway 1-2m at the level crossing location, which would effect surrounding site access onto the highway.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 248/1/17 Name: Welland Valley Rail	Refers to: Chapter 7	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective	Comments: Heavy rail reinstatement would likely need grade separation of the former level crossing at London Road - requiring an embankment to elevate the railway line, which might encroach a few but vital metres onto site LAA1139. Likewise it may also be necessary to lower the current highway 1-2m at the level crossing location, which would effect surrounding site access onto the highway.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 248/1/18	Refers to: Chapter 7	Legal compliance and soundness: Legal compliance: - not specified	Comments: Heavy rail reinstatement would likely need grade separation of the former level crossing at London Road - requiring an embankment to elevate the railway line, which might encroach	Suggested changes: None.	Officer comments: Noted.

Name: Welland Valley Rail		Plan is unsound: - not effective	a few but vital metres onto site LAA1139. Likewise it may also be necessary to lower the current highway 1-2m at the level crossing location, which would effect surrounding site access onto the highway.		
Representation reference: 248/1/21 Name: Welland Valley Rail	Refers to: Chapter 7	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective	Comments: LAA0333 - Northampton Railway Station (railfreight)- residential Development at this site should not restrict the ability to increase the number of passenger platforms at Northampton station – nor the ability to provide a right-sized RFI terminal for sustainable ‘final mile’ distribution of goods to Northampton.	Suggested changes: None specified.	Officer comments: Noted.
Representation reference: 250/1/3 Name: St Clair Land and Developments LLP Old Bedford Road	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: At the outset, our client commends the efforts of the Borough Council up to this point in progressing their Part 2 Local Plan, particularly in light of the acute housing land supply issues which are faced within the Borough and the significant threat to housing delivery which the ongoing COVID 19 pandemic continues to have.	Suggested changes: None.	Officer comments: Welcomed.
Representation reference: 250/1/4 Name: St Clair Land and Developments LLP Old Bedford Road	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: It is refreshing to learn that the Borough Council are continuing to expedite the production of the Part 2 Local Plan and the following comments are framed against the current macro-economic climate, the challenges faced by the aforementioned pandemic and the changes which the organisation faces as it moves towards unitary status along with Daventry and South Northants Districts.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 250/1/5 Name:	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: It is agreed that an important challenge for Northampton, which the emerging LPP2 should seek to meet, is that of housing delivery for all tenures. The document’s acknowledgement of the challenges posed by the dense built form within the legislative boundary of Northampton is	Suggested changes: None.	Officer comments: Noted.

St Clair Land and Developments LLP Old Bedford Road			welcomed and only serves to highlight the significant opportunity which greenfield sites, such as the client's, offer to meeting the existing and future development needs of the Borough.		
Representation reference: 250/1/6 Name: St Clair Land and Developments LLP Old Bedford Road	Refers to: The Plan	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Whilst there has been a historic under delivery of housing within the plan area since 2011, this has been further compounded in 2020 whereby almost two quarters of anticipated delivery has been lost due to the aforementioned ongoing global health crisis.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 250/1/17 Name: St Clair Land and Developments LLP Old Bedford Road	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: It is clear from Call for Sites submissions and the Council's Land Availability Assessment that the development options available within the Borough have been exhaustively considered and that there are no other sources of supply other than those which have been identified for development within the accompanying proposals map.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 250/1/28 Name: St Clair Land and Developments LLP Old Bedford Road	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: It remains our opinion that the site is one of the optimum sustainable locations for residential development in Northampton Borough. Any application for the future development of the site will be supported by a full suite of technical information to demonstrate that there will be no adverse impacts which would weigh against the future development of the site for residential purposes.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 250/1/29 Name:	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant.	Comments: It is therefore considered that there will be significant benefits arising from housing provision coupled with the site's sustainable proximity to services and facilities along with the	Suggested changes: None.	Officer comments: Noted.

St Clair Land and Developments LLP Old Bedford Road		Plan is sound.	raft of economic and social benefits associated with housing delivery will serve to outweigh any perceived impacts.		
Representation reference: 251/1/3 Name: Duncan Investments Ltd - Site E of Towcester Rd	Refers to: Chapter 7	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: Land at Towcester Road (Site ref: LAA1102) is bound by the railway line to the east, the M1 to the south and Towcester Road to the west. As a result, it is extremely well contained and its development would not lead to an unacceptable protrusion into open countryside. Further, the land is not affected by any environmental designations and development of the site would not cause harm to any heritage assets in the context of the Framework. It is acknowledged that the land is affected by topography and will require noise mitigation measures. However, it is considered these constraints can be satisfactory accommodated through the design and layout of the scheme, particularly in the context of noise mitigation, which can be achieved through a 'buffer' to the railway and/or acoustic treatment. Access is currently achieved from the Towcester Road and there is an existing track under the railway line connecting with land to the east (site ref: LAA1109). Whilst this is not currently suitable for vehicles, it has the potential to provide pedestrian and/or cycle access through to the adjoining land, which would be a significant benefit should the Collingtree SUE be extended west in the future. This would ensure connectivity in this area of Northampton, linking the SUE with the Towcester Road. The site is in a sustainable location close to existing properties to the north. A bus stop is located next to the site on the Towcester Road providing regular access into Northampton town centre. As such, the site represents a suitable option for development that is both deliverable and developable. Linden Homes as a national housebuilder, and the Developers, has the ability to deliver housing on the site in the short term helping address the current shortfall in housing across Northampton	Suggested changes: None.	Officer comments: Noted.

			Borough. However, it is recognised that the site may also be suitable for other uses, and the Developers would be willing to consider the potential for this with the Council.		
<p>Representation reference: 251/1/17</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Chapter 7 and policies map</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: In particular, the Developers support the inclusion of Site 1102 'Site east of Towcester Road allocated for residential development, as set out on the Policies Map.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 251/1/18</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Chapter 7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: However, it is critical that the Council's assumptions on lapse rates, non-implementation allowances, lead-in times and delivery rates contained within its overall supply, five-year housing land supply and housing trajectory are accurate and realistic. In this regard, the Developers would be pleased to provide further information to the Council demonstrating the deliverability of residential development at Site east of Towcester Road. It is acknowledged that the land is affected by topography and will require noise mitigation measures. However, it is considered these constraints can be satisfactory accommodated through the design and layout of the scheme, particularly in the context of noise mitigation, which can be achieved through a 'buffer' to the railway and/or acoustic treatment. An Indicative Concept Masterplan for the site, enclosed at Appendix 1, has been informed by extensive technical analysis. Access is currently achieved from the Towcester Road and there is an existing track under the railway line connecting with</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			land to the east (site ref: LAA1109). Whilst this is not currently suitable for vehicles, it has the potential to provide pedestrian and/or cycle access through to the adjoining land, which would be a significant benefit should the Collingtree SUE be extended west in the future. This would ensure connectivity in this area of Northampton, linking the SUE with the Towcester Road. The site is in a sustainable location close to existing properties to the north. A bus stop is located next to the site on the Towcester Road providing regular access into Northampton town centre.		
Representation reference: 251/1/31 Name: Duncan Investments Ltd - Site E of Towcester Rd	Refers to: Chapter 7 and policies map	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: The Developers support the inclusion of Site 1102 'Site east of Towcester Road' allocated for residential development, as set out on the Policies Map	Suggested changes: None.	Officer comments: Noted.
Representation reference: 229/1/21 Name: Barratt David Wilson Homes	Refers to: para. 7.15	Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate Plan is unsound: - not positively prepared - not justified - not effective	Comments: How will this be impacted by the amendment to the Use Classes Order?	Suggested changes: This policy requires significant amendments in light of the amendment to the Use Classes order.	Officer comments: Paragraph 7.15 does not mention the use class order so any changes to it will not alter the guidance within the paragraph. No modification required.

		- not consistent with national policy			
<p>Representation reference: 75/1/9</p> <p>Name: Town Centre Conservation Area Advisory Committee</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: Housing Mix appears to refer only to large new developments, however housing mix is important in existing communities where conversions can create a concentration of single-person or HiMO housing to the detriment of larger households.</p>	<p>Suggested changes: Add a sentence: “Conversions should demonstrate how they contribute to reinstating or maintaining a mix of housing types in the immediate community, meeting the varied needs of different households”.</p>	<p>Officer comments: Conversions of properties are required to meet the requirements of Policies 3 and 4. The Borough has an Article 4 Direction in place which seeks to regulate the number of Houses in Multiple Occupation in Northampton. No modification required.</p>
<p>Representation reference: 97/1/17</p> <p>Name: Clayson Country Homes</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: The respondent welcomes the pragmatic approach taken by the Council within Policy 14 and is refreshed to learn of the flexible approach the Council have taken by not prescribing a housing mix based on the outputs of the Strategic Housing Market Assessment. This approach will allow for housing delivery to flexibly respond to changing housing requirements over time.</p>	<p>Suggested changes: However, in regard to self and custom build housing, whilst the requirements for such housing are justified, it is considered that the 3-year period (to allow for the reversion to other forms of housing) should be reduced to 1 year to ensure that housing delivery is maintained.</p>	<p>Officer comments: It is accepted that planning permission can take up to 3 years to implement. It is considered reasonable to allow for this same time period for the policy requirements to be met.</p>

Representation reference: 195/1/16 Name: Mr B Cheer	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The respondent welcomes the pragmatic approach taken by the Council within Policy 14 and is refreshed to learn of the flexible approach the Council have taken by not prescribing a housing mix based on the outputs of the Strategic Housing Market Assessment. This approach will allow for housing delivery to flexibly respond to changing housing requirements over time. However, in regard to self and custom build housing, whilst the requirements for such housing are justified, it is considered that the 3-year period (to allow for the reversion to other forms of housing) should be reduced to 1 year to ensure that housing delivery is maintained.	Suggested changes: None.	Officer comments: Planning permissions have a 3 year implementation period and it is considered reasonable to apply this same timeline to the requirements for Policy 14. No modification required.
Representation reference: 200/1/18 Name: HBF	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: As set out in 2019 NPPF, the housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). All households should have access to different types of dwellings to meet their housing needs. Market signals are important in determining the size and type of homes needed. When planning for an acceptable mix of dwellings types to meet people's housing needs, the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as self & custom builders and the elderly without seeking a specific housing mix on individual sites. The LPP2 should ensure that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.	Suggested changes: None specified.	Officer comments: Noted.
Representation reference: 200/1/19 Name: HBF	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is unsound:	Comments: Policy 14 supports serviced plots of land for self & custom build housing on other allocated sites or permitted windfall sites provided this would not result in an over-provision of this type of housebuilding when compared to the Council's supply / demand balance. The Council also supports proposals for self & custom build housing, which include the creation of low cost	Suggested changes: None.	Officer comments: Noted.

		<ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	and affordable housing. The HBF is supportive of the Council's policy approach.		
<p>Representation reference: 200/1/20</p> <p>Name: HBF</p>	Refers to: Policy 14	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	<p>Comments:</p> <p>Policy 14 also requires that on sites of more than 100 dwellings provision should be made for a proportion of serviced plots of land to contribute towards meeting the evidenced demand for self & custom build housing. After 3 years self & custom build plots remaining vacant can revert to other forms of housing provision. There are 19 site allocations for circa 4,329 dwellings (and presumably the SUEs too) potentially impacted by this policy requirement. The HBF object to this policy requirement.</p> <p>The 2019 NPPF states that policies should be clearly written and unambiguous (para 16). A policy requirement for a proportion of serviced plots for self & custom build housing is unclear and ambiguous, which causes uncertainty for both applicants and decision makers. This is inconsistent with national policy.</p> <p>Under the Self Build & Custom Housebuilding Act 2015 the Council has a duty to keep a Register of people seeking to acquire self & custom build plots and to grant enough suitable development permissions to meet identified demand. The NPPG (ID: 57-025-201760728) sets out ways in which the Council should consider supporting self & custom build. These are :-</p> <ul style="list-style-type: none"> • developing policies in the LPP2 for self & custom build • using Council owned land if available and suitable for self & custom build and marketing such opportunities to entrants on the Register 	Suggested changes: Alterations to the requirement self-build plots.	Officer comments: There were 30 people registered on the self build and custom build database at the time of the policy formulation. A formula was put in place to calculate the number of potential plots required. This policy requirement is considered to be a balance between meeting those needs and not placing onerous demands on housebuilders.

			<ul style="list-style-type: none"> • engaging with landowners, who own housing sites and encouraging them to consider self & custom build and where the landowner is interested facilitating access to entrants on the Register ; and • working with custom build developers to maximise opportunities for self & custom housebuilding. <p>The Council should not move beyond encouraging provision of self & custom build plots on residential development sites of more than 100 dwellings. The Council should not seek to place the burden for delivery of self & custom build plots onto developers of sites of more than 100 dwellings contrary to national guidance, which outlines that the Council should engage with landowners and encourage them to consider self & custom build. Furthermore, the Council has provided no justification for the selection of 100 or more dwellings as the threshold for qualifying development proposals.</p> <p>As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The Council's Self & Custom Build Register alone is not a sound basis for setting a specific policy requirement. As set out in the NPPG, the Council should provide a robust assessment of demand including an assessment and review of data held on the Council's Register (ID 2a-017-20192020), which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (ID 57-0011-20160401). The Council should analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on housing sites of 100 or more dwellings. It is also possible for individuals and organisations to register with more than one Council so there is a possibility of some double counting. The Register may indicate a level of expression of interest in self & custom build</p>		
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			but it cannot be reliably translated into actual demand should such plots be made available. The number of entries on the Council's Register has not been disclosed.		
<p>Representation reference: 200/1/21</p> <p>Name: HBF</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Council's policy approach should be realistic to ensure that where self & custom build plots are provided, they are delivered and do not remain unsold. Without disclosure of expressions of interest on the Council's Self Build Register, there is a risk of over supply against demand. If demand for plots is not realised, there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council's HLS. If consents are granted but not implemented, then this policy cannot be considered effective. The Council should consider the application of a non-implementation rate to its HLS calculations.</p> <p>The co-ordination of self & custom build plots on housing sites of more than 100 dwellings with the development of the wider site will be challenging. At any one time, there are often multiple contractors and large machinery operating on a housing site. From a practical and health & safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. Where plots are not sold, it is important that the Council's policy is clear as to when these revert to the original developer. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. The Council's proposed 3 years vacancy period is too long creating even greater logistical problems if the original housebuilder has completed the</p>	<p>Suggested changes: Alterations to the requirement self-build plots.</p>	<p>Officer comments: There were 30 people registered on the self build and custom build database at the time of the policy formulation. A formula was put in place to calculate the number of potential plots required. This policy requirement is considered to be a balance between meeting those needs and not placing onerous demands on housebuilders.</p>

			development and is forced to return to site to build out plots, which have not been sold to self & custom builders.		
<p>Representation reference: 200/1/22</p> <p>Name: HBF</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: As well as on-site practicalities, any adverse impacts on viability should be tested. The Council's Plan Viability Study does not consider this policy requirement. The Council expects serviced plots to be provided therefore the financial impacts from delayed delivery or non-delivery of self & custom build should be assessed. There may also be a detrimental impact upon the level of affordable housing provision achieved from sites of 100 or more dwellings because self & custom build dwellings are exempt from infrastructure contributions and affordable home ownership provision as set out in national policy hence a greater burden falls onto fewer market sale dwellings. The Council may wish to adopt an aspirational approach to delivering self & custom build housing, but this should not be pursued at the expense of delivering affordable housing. The requirement for provision of self & custom build plots on sites of 100 or more dwellings should be deleted.</p>	<p>Suggested changes: Alterations to the requirement self-build plots.</p>	<p>Officer comments: There were 30 people registered on the self build and custom build database at the time of the policy formulation. A formula was put in place to calculate the number of potential plots required. This policy requirement is considered to be a balance between meeting those needs and not placing onerous demands on housebuilders.</p>
<p>Representation reference: 200/1/23</p> <p>Name: HBF</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective</p>	<p>Comments: Policy 14 also requires that an appropriate proportion of residential development must be designed to meet the requirements of Building Regulations Part M4(2) (accessible & adaptable dwellings) or its successor standard. 4% of all new market dwellings and 8% of affordable dwellings should be constructed to Building Regulations Part M4(3) (wheelchair user dwellings) standards, or their successor, to enable wheelchair accessibility.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Detailed specialist housing requirements are set out in the the Northampton Specialist Housing SPD which applicants should refer to.</p>

		<p>- not consistent with national policy</p>	<p>The 2019 NPPF states that policies should be clearly written and unambiguous (para 16). A policy requirement for an appropriate proportion of residential development to be designed to meet M4(2) standards is unclear and ambiguous, which causes uncertainty for both applicants and decision makers. This is inconsistent with national policy.</p> <p>If the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the latest NPPG. Footnote 46 states “that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties”. As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011- 20150327) to ensure that an appropriate evidence base is available to support any proposed policy requirements. The NPPG sets out that evidence should include identification of :-</p> <ul style="list-style-type: none"> • the likely future need ; • the size, location, type and quality of dwellings needed ; • the accessibility and adaptability of the existing stock ; • variations in needs across different housing tenures : and • viability. <p>In determining the quantum of M4(2) and M4(3) homes the Council should focus on the ageing population living in the Borough compared to national / regional figures and the proportion of older households choosing to live in newly built</p>		<p>This contains the most up to date evidence and need requirements for specialist housing in Northampton.</p>
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			<p>homes. It is noted that Office for National Statistics (ONS) Overview of the UK Population dated November 2018 estimated that 18.2% of the UK population were aged 65 years or over in 2017 compared with only 15% in Northampton. Optional M4(2) and M4(3) standards should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as “requiring something because it is essential or very important rather than just desirable”.</p> <p>Many older households already live in the Borough. Many older households will not move from their current home but will make adaptations as required to meet their needs, some will choose to move to another dwelling in the existing stock rather than a new build property and some will want to live in specialist older person housing. The existing housing stock is considerably larger than the new build sector (circa 97,226 dwellings as at 2019) so adapting the existing stock is likely to form part of the solution. It is also important to note that not all health problems affect a household’s housing needs therefore not all health problems require adaptations to homes.</p> <p>All new homes are built to Building Regulation Part M4(1) standards, which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. These standards are not usually available in the older existing housing stock and benefit less able-bodied occupants. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case. M4(1) standards are likely to be suitable for most residents.</p>		
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Representation reference: 200/1/24 Name: HBF	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: It is noted that Policy H4 of the adopted WNJCS already requires Lifetime Homes standards (para 5.15).	Suggested changes: None.	Officer comments: Noted.
Representation reference: 200/1/25 Name: HBF	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Detailed evidence should be gathered to determine whether there is a need for optional standards in Northampton and to justify setting appropriate policy requirements in the LPP2. The West Northamptonshire Housing Market - Northampton Summary by ORS (September 2017) and the Study of Housing & Supporting Needs of Older People across Northamptonshire 2017 by Three Dragons (March 2017) do not provide an evidential basis to justify the Council's proposed policy requirement. Furthermore, this data is now somewhat dated. The recently published Planning Inspectorate Guidance for Local Plan Examination (para 1.11) sets out that evidence base documents dating from two or more years before the submission date for examination of a Local Plan may be at risk of having been overtaken by new data. Such documents should be updated as necessary to incorporate the most recent available information.	Suggested changes: None specified.	Officer comments: Northampton Borough Council adopted the Specialist Housing SPD in November 2019. It provides evidence, and sets out the need, for optional specialist housing standards in Northampton.
Representation reference: 200/1/26 Name:	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant.	Comments: It is noted that the Council acknowledges that further work needs to be carried out to establish the proportion of M4(2) dwellings that would be most appropriate (para 7.20 of LPP2) and the Housing & Support Older People in Northamptonshire	Suggested changes: None specified.	Officer comments: Northampton Borough Council adopted the Specialist Housing

HBF		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Report confirms that adopting M4(2) requires evidence of need (para 4.15). The policy provides no flexibility for site specific factors (including topography, risk of flooding, etc), which may justify a departure from these proposed policy requirements.		SPD in November 2019. It provides evidence, and sets out the need, for optional specialist housing standards in Northampton.
Representation reference: 200/1/27 Name: HBF	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: As set out in the NPPG (ID 56-008) the requirement for M4(3) should only be required for dwellings over which the Council has housing nomination rights.	Suggested changes: None specified.	Officer comments: Para 009 – 56-009 of the PPG relates to Part M of the Building Regulations. It outlines the difference between wheelchair accessible homes and wheelchair adaptable homes which fall into Cat M4(2) of Document M. Policies can be applied to only Cat M4(2) wheelchair accessible homes only where the LA is responsible for allocating or nominating a person to live in that dwelling. Therefore it is acceptable to maintain the policy as it is, and require

					all developers to provide 'adaptable' dwellings. The need is evidenced in the Specialist Housing SPD. Cat M4(3) relates to wheelchair user dwellings and the need in Northampton is evidenced in the Housing Market Evidence. PPG does not limit policy ability, as it does for wheelchair accessible.
<p>Representation reference: 200/1/28</p> <p>Name: HBF</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Council's viability testing should take full account of additional costs for any policy requirements for optional M4(2) and M4(3) standards. The costs of both M4(2) and M4(3) should be included in viability testing. The Council's Plan Viability Study only includes a cost of £521 per dwellings for M4(2) on a baseline assessment of 10% provision and £10,307 per dwelling for M4(3). In September 2014, the Government's Housing Standards Review included cost estimates by EC Harris, which for M4(3) were £15,691 per apartment and £26,816 per house respectively, which are higher than the costs used by the Council. Furthermore, any inflationary cost increases since 2014 should be included and M4(3) compliant dwellings are larger than NDSS therefore larger sizes should be used when calculating additional build costs for M4(3) and any other input based on square meterage.</p>	<p>Suggested changes: The requirements for optional M4(2) and M4(3) should be deleted.</p>	<p>Officer comments: The Local Plan Viability Assessment was undertaken to assess the viability of policies, and was prepared using the latest market information obtained both through desk top study/ market intelligence and a workshop with developers/ landowners/ agents.</p>

			The requirements for optional M4(2) and M4(3) should be deleted.		
Representation reference: 201/1/9 Name: Persimmon Homes	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: Draft Policy 14 states that on sites of more than 100 dwellings, provision should be made for a proportion of serviced plots of land to contribute towards meeting evidenced demand for self-build and custom build housing in Northampton. We generally welcome the approach of the overall quantum of self and custom build provision being linked to the “evidenced demand” that exists at the time as per the register of self-build and custom build projects.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 201/1/10 Name: Persimmon Homes	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: In order for such a policy to be justified, however, we would expect at least some analysis of the existing register in the area supported by necessary additional data from secondary sources in line with the PPG (paragraph 011 Reference ID: 57-011-20160401). There does not appear to be any part of the evidence base that deals with understanding the demand for self-build and custom housing in Northampton Borough and would we note that the Housing Market Evidence paper by Opinion Research Services (September 2017) does not appear to deal with the need for custom or self-build housing at all.	Suggested changes: None specified.	Officer comments: There were 30 people registered on the self build and custom build register. A formula was used to assess the potential number of sites required. This policy was formulated to ensure that there is a balance between supply and demand of such requirements.
Representation reference: 201/1/11 Name: Persimmon Homes	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is unsound:	Comments: In light of this apparent lack of evidence, we do not see how a requirement to incorporate custom and self-build provision is justified. Notwithstanding this point, we would emphasise our general objection to requiring the provision of custom and self-build plots in standard housing schemes.	Suggested changes: None specified.	Officer comments: There were 30 people registered on the self build and custom build register. A formula

		<ul style="list-style-type: none"> - not justified - not effective - not consistent with national policy 	<p>Firstly, these plots are slow to come forward and are vulnerable to the economic circumstances of the individual builder.</p>		<p>was used to assess the potential number of sites required. This policy was formulated to ensure that there is a balance between supply and demand of such requirements.</p>
<p>Representation reference: 201/1/14</p> <p>Name: Persimmon Homes</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: <ul style="list-style-type: none"> - not justified - not effective - not consistent with national policy </p>	<p>Comments: Whilst we would support planning for some self and custom build sites over the plan period, it is necessary that any corresponding requirements in this regard are proportionate to demand and we cannot see from the evidence base how this existing demand has been considered to arrive at the wording of draft Policy 14. In general, we would advocate an approach that saw custom and self-build exception sites or land specifically allocated for this type of housing in a manner that corresponds to the evidenced demand rather than custom and self-build plots being required through the delivery of large sites.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: There were 30 people registered on the self build and custom build register. A formula was used to assess the potential number of sites required. This policy was formulated to ensure that there is a balance between supply and demand of such requirements.</p>
<p>Representation reference: 201/1/15</p> <p>Name: Persimmon Homes</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: <ul style="list-style-type: none"> - not justified - not effective - not consistent with national policy </p>	<p>Comments: We note that if plots for self-build and custom build remain vacant for three years, then draft Policy 14 allows them to revert to other forms of housing provision. The ability to respond to a lack of uptake is welcome but requiring developers to market custom and self-build plots for three years is an excessive amount of time and we would note that in other authorities (e.g. Kettering Borough Council) the figure is closer to six months.</p>	<p>Suggested changes: We would suggest that this is a reasonable period in which to gauge demand following which the plots should be allowed to revert to a</p>	<p>Officer comments: It takes 3 years for a planning permission to be implemented. It is considered reasonable to allow the same time line to be applied to this requirement.</p>

				typical residential use.	
Representation reference: 201/1/16 Name: Persimmon Homes	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: Finally, we would object to the manner in which the requirement to incorporate custom and self-build plots has been tested in the Plan Viability Study (June 2020). We do not see how this could be considered without an indication of the number of custom and self-build units to be delivered over the plan period recognising that requiring developers to hold custom and self-build plots on their books for up to three years will have obvious cash flow implications.	Suggested changes: For the reasons above, Persimmon OBJECTS to draft Policy 14 insofar as it requires the delivery of custom and self-build units on sites of more than 100 units and this element of the policy should be deleted for plan soundness for lack of justification.	Officer comments: There were 30 people registered on the self build and custom build register. A formula was used to assess the potential number of sites required. This policy was formulated to ensure that there is a balance between supply and demand of such requirements.
Representation reference: 228/1/5 Name: David Russell	Refers to: Policy 14	Legal compliance and soundness: Plan is not legally compliant: - reason not specified Plan is unsound: - not consistent with national policy	Comments: I'm also concerned about access to this planned area. Rushmere road is extremely busy morning and evenings and this added amount of housing with likely only one way in and out is only going to add to that.	Suggested changes: None.	Officer comments: Any proposals that come forward will need to comply with the relevant policies on highways safety and sustainable travel. The Highways authority will also be consulted on any proposals that are submitted through the development management process.
Representation reference: 228/1/6	Refers to: Policy 14	Legal compliance and soundness:	Comments:	Suggested changes: None.	Officer comments:

<p>Name: David Russell</p>		<p>Plan is not legally compliant: - reason not specified</p> <p>Plan is unsound: - not consistent with national policy</p>	<p>The Former Abington Mill Farm, land of Rushmere Road is regularly flooded and even listed at medium and high risk on the local county council land. I'm concerned a resident who lives close to this land that work here may merely move the flood risk to areas next to this with my house and my neighbours very close by.</p>		<p>The site was considered for development allocation following a land availability assessment which took into account the land's potential for flooding. Any development proposals will need to conform with flood related policies in the Local Plan and implement, if necessary, flood mitigation measures.</p>
<p>Representation reference: 229/1/18</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness:</p> <p>Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments:</p> <p>Paragraph 7.15 refers to the Council and their duty to keep a self-build and custom build register to provide the Council with evidence when making provision for serviced plots of land. However, the paragraph is not explicit in terms of the number of plots on the current register of self-build or custom build register, nor is there reference within the paragraph as to other documents and studies that would form the evidence base for projecting the number of self-build and custom build plots over the plan period. It is, therefore, questionable as to how a trigger of 100 dwellings where provision of self-build and custom build housing will be sought. Furthermore the policy is not explicit as to the mechanisms by which a proportion of self-build or custom build can be negotiated between the Council and the Applicant.</p>	<p>Suggested changes: None.</p>	<p>Officer comments:</p> <p>The number of plots on the register will change throughout the lifetime of the Plan. The applicant should liaise with the Council during the application stage to determine the proportion of self-build and custom build housing required. No modification required.</p>

<p>Representation reference: 229/1/19</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Justification has not been given as to why a plot needs to remain vacant for 3 years. Presumably, as it is captured in the S106 obligation, there would be additional requirement to provide evidence of marketing and marketing at a price that would be of an appropriate value to revert to other forms of housing. The policy should provide the ability to demonstrate there is no need for a self-build or custom build plot within the 3 year period by submitting an up to date Housing Need Survey.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The 3 years relates to the timeline of planning consent being implemented. It is reasonable to allow the same time line for this policy requirement to be met. No modification required.</p>
<p>Representation reference: 229/1/20</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The housing mix is very prescriptive which does not build in any form of flexibility that could accommodate market demand. Given my comments to policy 13, there might be the need for a different size, type and tenure of house as a result of predictable events. The policy would be more effective in stating percentage ranges. Furthermore, as a result of being too prescriptive, more housing market assessments will be submitted by applicants, which will increase the time taken to determine applications, thus further eroding the Council's ability to meet the required housing delivery targets. It is pleasing to see that an "appropriate proportion" of residential development is required to comply with M4(2) of the building regulation rather than a set %, however, the policy needs to make explicit that an "appropriate proportion" will not only take into account the needs of the Borough but also the site's characteristics and viability. At present, BDW are working with a neighbouring Authority, in the North Northants Joint Core Strategy area, where the site's</p>	<p>Suggested changes: Modification "Derived from xxx and xx study, proposals of over 100 dwellings or more will be required to provide a proportion of self-build and custom build, through negotiations between the Council and the Applicant, which takes into account the site's ability to provide such plots</p>	<p>Officer comments: The 3 years relates to the timeline of planning consent being implemented. The Council's most recent evidence supports the mix set out in Policy 14. If evidence suggests the mix should be altered, there is flexibility in the policy to be able to demonstrate that.</p>

			<p>characteristics do not lend itself to providing policy 30 of the NNJCS requirements for M4(2) and M4(3) housing, notwithstanding any viability test.</p> <p>The policy is therefore not justified into how the trigger to provide self-build and custom build plots has been derived and nor is it effective in this regard to allow for negotiation between the Council and applicant in terms of the number of self-build and custom build plots are required.</p> <p>The policy does not justify why a plot needs to remain vacant for 3 years.</p> <p>The policy is not effective by virtue of the very prescriptive housing mix which will lead to increased viability assessments being submitted and it is not effective in so far as to the considerations to be taken into account such as the sites characteristics. It is worth nothing that Policy H08, Daventry does allow for consideration of the sites characteristics.</p>	<p>through a viability assessment".</p> <p>"To meet the needs of 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, including the site's characteristics and viability, should be designed to meet the requirements of Building Regulations Part M4(2).</p>	
<p>Representation reference: 244/1/23</p> <p>Name: Bastion Group</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Bastion support Policy 14 and the need for developments to respond to local housing need. There is clarity required, however, in terms of where such evidence on the latest need should be sourced from. Details are included in paragraphs 7.14 – 7.20 of the Local Plan, however, it is not clear if it is this that should be applied or if the latest evidence should be obtained from the Strategic Housing Market Assessment, for example. A clear policy position on this is required.</p>	<p>Suggested changes: Bastion support Policy 14 and the need for developments to respond to local housing need. There is clarity required, however, in terms of where such evidence on</p>	<p>Officer comments: Local housing need is addressed through the WNJCS and the LPP2 must comply with this requirement. There will be new evidence for the Strategic Plan.</p>

			In terms of the provision of affordable housing, Bastion support the principle of this but suggest that in order to improve the soundness of this policy there should be reference to the ability to provide commuted sums or off-site provision in exceptional circumstances. Furthermore, there should be a policy requirement for schemes that cannot provide the necessary 35% affordable housing to be supported by a viability assessment.	the latest need should be sourced from.	
Representation reference: 251/1/19 Name: Duncan Investments Ltd - Site E of Towcester Rd	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: Policy 14 requires the following in respect of Specialist and Accessible Housing: ‘To meet the needs of 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. 4% of all new market dwellings and 8% of affordable dwellings should be constructed to Building Regulations Part M4(3) (Wheelchair user dwellings) standards, or their successor, to enable wheelchair accessibility.’ NPPF Paragraph 16 states that policies should be ‘clearly written and unambiguous, so it is evident how a decision maker should react to development proposals’. A policy requirement for an ‘appropriate proportion of residential development’ to be designed to meet M4(2) standards is unclear and ambiguous, which causes uncertainty for both applicants and decision makers. This element fails the test of soundness and is therefore inconsistent with the Framework.	Suggested changes: None specified.	Officer comments: Detailed specialist housing requirements are set out in the Northampton Specialist Housing SPD which applicants should refer too. This contains the most up to date evidence and need requirements for specialist housing in Northampton.
Representation reference: 251/1/20	Refers to: Policy 14	Legal compliance and soundness: Plan is legally compliant.	Comments: Should the Council wish to apply the optional NDSS to new build dwellings, this should be done in accordance with Footnote 46 of NPPF Paragraph 127(f):	Suggested changes: None specified.	Officer comments: Northampton Borough Council adopted the

<p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>		<p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>'Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.'</p> <p>As set out under Paragraph 31, all policies should be 'underpinned by relevant and up-to-date evidence', and 'should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.' In this respect, the PPG15 sets out the evidence required to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards: 'Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:</p> <ul style="list-style-type: none"> • the likely future need for housing for older and disabled people (including wheelchair user dwellings). • size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes). • the accessibility and adaptability of existing housing stock. • how needs vary across different housing tenures. • the overall impact on viability.' <p>The Developers consider the Council has failed to robustly demonstrate the need for optional standards nor justified setting appropriate policy requirements through Policy 14. The relevant evidence-base documents comprise 'The West Northamptonshire Joint Planning Unit – Housing Market</p>		<p>Specialist Housing SPD in November 2019. It provides evidence, and sets out the need, for optional specialist housing standards in Northampton.</p>
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			<p>Evidence: Executive Summary for Northampton Borough' (ORS, September 2017) and 'Study of Housing and Support Needs of Older People Across Northamptonshire' (Three Dragons and Associates, March 2017) do not provide an evidential basis to justify the Council's proposed policy requirement.</p> <p>Furthermore, this data is now somewhat dated: the 'Procedure Guidance for Local Plan Examination' (The Planning Inspectorate, June 2019) confirms the evidential requirements of submitted plan16:</p> <p>'Is the evidence base sufficiently up-to-date?</p> <p>Evidence base documents, especially those relating to development needs and land availability, that date from two or more years before the submission date may be at risk of having been overtaken by events, particularly as they may rely on data that is even older. As a minimum, any such documents should be updated as necessary to incorporate the most recent available information. But this may not be necessary for evidence documents on topics that are less subject to change over time, such as landscape character assessments.'</p> <p>[Emphasis added]</p> <p>It is noted the Council acknowledges that 'further work needs to be carried out to establish the proportion of Category 2 dwellings that would be most appropriate'17. Equally, the Study of Housing and Support Needs of Older People Across Northamptonshire' (Three Dragons and Associates, March 2017) confirms that adopting M4(2) requires evidence of need.</p>		
<p>Representation reference: 251/1/21</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 14</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Moreover, the Council's viability testing should take full account of additional costs for any policy requirements for optional M4(2) and M4(3) standards. In this regard, the Council's Plan Viability Study (Aspinall Verdi, June 2020) only includes a cost of £521 per dwellings for M4(2) on a baseline assessment of 10% provision and £10,307 per dwelling for M4(3).</p>	<p>Suggested changes: Resultingly, the requirements for optional M4(2) and M4(3) should be deleted from this policy.</p>	<p>Officer comments: The Local Plan Viability Assessment was undertaken to assess the viability of policies, and was prepared using the latest market</p>

		- not consistent with national policy	In September 2014, the Government's Housing Standards Review included cost estimates by EC Harris: for Category 2 access this was estimated at a range between £520 to £940 per dwelling, and for Category 3 between £7,764 to £23,05219. Both estimates are significantly higher than the costs used by the Council.		information obtained both through desk top study/ market intelligence and a workshop with developers/ landowners/ agents.
Representation reference: 43/1/3 Name: Environment Agency	Refers to: Policy 15	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: For Information - The Northampton Local Plan Part 2... June 2020 has updated the HiMO policy now 15 (was 14) to include some wording on the need to ensure that ground floor bedrooms mitigation flood risk. We are happy with this wording but wish to highlight that in some instances the flood depths in the hazard mapping areas are too great to mitigate and therefore ground floor bedroom would not be supported. The West Northants SFRA update December 2017 has some good advice on HiMO and floor levels. The SFRA states in 9.36 "all planning applications for the conversion of dwellings into homes of multiple occupation, must be accompanied by a site-specific flood risk assessment demonstrating that the accommodation (and indeed the whole development) is safe from the risk of flooding from all sources and includes safe refuge".	Suggested changes: None	Officer comments: Noted. Paragraph 5.30 of the LPP2 sets out that Policy BN7 of the West Northamptonshire Joint Core Strategy 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. No modification required.
Representation reference: 228/1/7 Name:	Refers to: Policy 15	Legal compliance and soundness: Plan is not legally compliant:	Comments: I'm also concerned about access to this planned area. Rushmere road is extremely busy morning and evenings and	Suggested changes: None.	Officer comments: Any proposals that come forward will need to comply with

David Russell		- reason not specified Plan is unsound: - not consistent with national policy	this added amount of housing with likely only one way in and out is only going to add to that.		the relevant policies on highways safety and sustainable travel. The Highways authority will also be consulted on any proposals that are submitted through the development management process.
Representation reference: 228/1/8 Name: David Russell	Refers to: Policy 15	Legal compliance and soundness: Plan is not legally compliant: - reason not specified Plan is unsound: - not consistent with national policy	Comments: The Former Abington Mill Farm, land of Rushmere Road is regularly flooded and even listed at medium and high risk on the local county council land. I'm concerned a resident who lives close to this land that work here may merely move the flood risk to areas next to this with my house and my neighbours very close by.	Suggested changes: None.	Officer comments: The site was considered for development allocation following a land availability assessment which took into account the land's potential for flooding. Any development proposals will need to conform with flood related policies in the Local Plan and implement, if necessary, flood mitigation measures.
Representation reference: 148/1/17 Name:	Refers to: Chapter 8	Legal compliance and soundness: Plan is legally compliant.	Comments: The respondent welcomes the positive and robust approach to economic development as set out within Chapter 8 of the document.	Suggested changes: None.	Officer comments: Noted.

St Clair Land and Developments LLP		Plan is sound.			
Representation reference: 239/1/3 Name: Duncan Investments Ltd - Houghton Gate	Refers to: Chapter 8	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Duncan Investments Ltd considers that the policy approach in Chapter 8 of the NLP2 would not meet the tests of soundness because: 1. It is not positively prepared; 2. It is not justified; 3. It is not effective; and 4. It is not consistent with national policy. In order to ensure that the Policy approach taken in Chapter 8 is sound it is considered that: The NLP2 should allocate sufficient employment land to address the very significant quantitative and qualitative shortfall of industrial and warehousing land; and	Suggested changes: The NLP2 should allocate sufficient employment land to address the very significant quantitative and qualitative shortfall of industrial and warehousing land.	Officer comments: Policy 18 of the LPP2 states that proposals outside of the safeguarded employment sites will be supported provided they meet certain criteria. No change.
Representation reference: 239/1/4 Name: Duncan Investments Ltd - Houghton Gate	Refers to: Chapter 8	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: The Houghton Gate site should be identified as an employment allocation to help meet this shortfall. The Houghton Gate site has the potential to help support a range of economic aspirations at the local and sub-regional level, particularly in terms of meeting Northampton Borough's future growth needs.	Suggested changes: The Houghton Gate site should be identified as an employment allocation to help meet this shortfall.	Officer comments: Policy 18 of the LPP2 states that proposals outside of the safeguarded employment sites will be supported provided they meet certain criteria. No change.
Representation reference: 239/2/4 Name:	Refers to: Chapter 8	Legal compliance and soundness: Plan is legally compliant.	Comments: Chapter 8 proposes two economic policies (17 and 18), the first of which seeks to safeguard existing employment sites and the second of which supports new employment developments and	Suggested changes: None.	Officer comments: Policy 38 allocates sites for employment development. No

Duncan Investments Ltd - Houghton Gate		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	schemes outside of safeguarded sites. The NLP2 does not allocate any additional sites for employment development.		modification required.
Representation reference: 123/1/4 Name: Henry Martin Ltd	Refers to: Policy 17	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective	Comments: Policy 17- Safeguarding Existing Employment Sites Paragraph 80 of the NPPF reques planning policies to "help create the conditions in which businesses can invest, expand and adapt'. It also establishes that "Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development." The principle of safeguarding all existing employment sites within the Borough for employment uses is therefore considered to be consistent with the NPPF in respect of supporting economic growth, productivity and business development.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 123/1/5 Name: Henry Martin Ltd	Refers to: Policy 17	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective	Comments: Policy 17 is also considered to support tine overall aims of Policy S8(1)(a) of the West Northamptonshire Joint Core strategy which sets out an ambition to deliver job growth through the renewal and regeneration of existing employment sites. Likewise, the policy approach set out in Policy 17 is deemed to broadly accord with Policy1 of the West Northamptonshire Joint Core Strategy as it seeks to retain existing employment sites and industrial estates to help support a vibrant, successful and developing local economy.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 123/1/6	Refers to: Policy 17	Legal compliance and soundness:	Comments:	Suggested changes: None.	Officer comments: Noted.

<p>Name: Henry Martin Ltd</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>The provisions set out in Policy 17 are also welcomed as they will help to support the future renewal and improvement of the existing business premises at Martin's Yard Business Park. This will enable the owners of the site to respond to the demands of the existing businesses for modern and larger workspaces. Ultimately, this will help to facilitate business growth and thus has the potential to create new job opportunities and protect existing jobs.</p>		
<p>Representation reference: 200/1/15</p> <p>Name: HBF</p>	<p>Refers to: Policy 17</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. The Council should re-consider the continuing likelihood of 300 dwelling per annum from windfalls where 71 sites for housing development are allocated in the LPP2 and Policy 17 safeguards all existing employment sites.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: There is a criteria in bullet point 2 of Policy 17 that allows for Change of Use. Although not specifically for housing, this is also permitted via Permitted Development.</p>
<p>Representation reference: 234/1/6</p> <p>Name: Diversified Property Fund For Charities</p>	<p>Refers to: Policy 17</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Firstly, the requirement to demonstrate a continuous (and lengthy) period of vacancy of 6-12 months is counterintuitive and may do more harm to economic activity than good in preventing the swift re-occupation with an active use and reducing vacancy periods. It is preferable to have an active economic use of a site (even if an alternative use) than it remain vacant just to satisfy a minimum period specified in policy. DPFC therefore suggest that Policy 17 should be broadened to include additional criteria that could be satisfied as an alternative to allow for the alternative use of units within an Existing Employment Area. These criteria should allow the introduction of non-employment uses where the land or premises are no longer well located or where there is no need</p>	<p>Suggested changes: Policy 17 should be broadened to include additional criteria that could be satisfied as an alternative to allow for the alternative use of units within an Existing Employment Area.</p>	<p>Officer comments: These criteria are already included in the wording of policy 17.</p>

			to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use.		
<p>Representation reference: 234/1/7</p> <p>Name: Diversified Property Fund For Charities</p>	<p>Refers to: Policy 17</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Secondly, Policy 17 as currently drafted fails to provide a policy framework for the wholesale redevelopment of an Existing Employment site. Grafton Trade Park's location is highly sustainable (as the ELA concluded) whilst it is set within a mix of surrounding uses which will likely become more varied as other land and buildings are released from the employment land designation. Taken together, and depending on the market for units of this type and size in this location, the redevelopment of the Trade Park for a range of high quality uses could represent sustainable development. DPFC therefore suggest there is a need for Policy 17 to be amended so that it supports the wholesale redevelopment of Existing Employment Areas, subject to certain criteria being met. Such criteria could relate to the proportion of units that are vacant across the site, the beneficial impact on amenity that alternative uses could deliver, the requirement for the retention of the existing use with regards to alternative existing premises, and the requirement for the use proposed. The approach that is proposed in the Intend to Publish London Plan (which supports proposals that introduce alternative uses within a designated employment area so long as the level of employment floorspace or job provision is maintained) warrants consideration as an approach.</p> <p>Policy 19</p> <p>This is a general retailing policy contained within the NLLP2. Its scope is broad, identifying a requirement for the provision of a certain amount of retail floorspace over the plan period, outlining the retail hierarchy, re- iterating a town centre first</p>	<p>Suggested changes: DPFC therefore suggest there is a need for Policy 17 to be amended so that it supports the wholesale redevelopment of Existing Employment Areas, subject to certain criteria being met.</p>	<p>Officer comments: Policy 17, as drafted, does not preclude redevelopment for employment uses. No change.</p>

			approach, and setting the planning policy context for proposals in defined retail frontages. It also, in line with the National Planning Policy Framework (NPPF) (February 2019), reiterates that a sequential test is to be undertaken for all proposals for main town centre uses outside of designated centres and a retail impact assessment for proposals in excess of 500sqm (substantially lower than the default threshold of 2,500m2 set in the NPPF2).		
Representation reference: 234/1/8 Name: Diversified Property Fund For Charities	Refers to: Policy 17	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: There are a number of town centre uses (as defined in the NPPF) that, due to the requirement for large floorplates, onsite car parking or high ceilings are increasingly located (and arguably better suited) within warehouse units within industrial estates. Gyms are a classic example but there are other leisure and retailing uses that would fit into this category and the “light industrial” nature of operations by the existing occupiers within Grafton Trade Park would make it an attractive location for such uses. Whilst Policy 17 recognises that such uses are likely to be ancillary to, and support the function of, employment areas, at present, if they are characterised as main town centre uses (as defined in the NPPF) there would be a requirement for a sequential test and retail impact assessment. DPFC therefore recommend that the policy wording and accompanying subtext is amended to recognise this and note, in line with the Retail and Leisure Study (Nexus Planning, September 2018) which forms part of the evidence base for the NLLP2, that any retail impact assessment must be proportionate to the proposals.	Suggested changes: DPFC therefore recommend that the policy wording and accompanying subtext is amended to recognise this and note, in line with the Retail and Leisure Study (Nexus Planning, September 2018) which forms part of the evidence base for the NLLP2, that any retail impact assessment must be proportionate to the proposals.	Officer comments: These criteria are already included in the content of policy 17.
Representation reference: 123/1/7 Name:	Refers to: Policy 18	Legal compliance and soundness: Plan is legally compliant.	Comments: Policy 18 - Supporting New Employment Developments and Schemes Outside Safeguarded Sites	Suggested changes: None.	Officer comments: Noted.

Henry Martin Ltd		Plan is unsound: - not effective	The approach set out in Policy 18 towards new employment provision outside safeguarded employment sites is supported in principle.		
Representation reference: 148/1/3 Name: St Clair Land and Developments LLP	Refers to: Policy 18	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The inclusion of the site (Ref: 1101) as an employment allocation within emerging Policy 18 of the DPD has afforded the landowner a level of confidence to progress technical work in respect of the future development of the site.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 148/1/18 Name: St Clair Land and Developments LLP	Refers to: Policy 18	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Policy 18 is considered to provide a robust and flexible approach to supporting the development of new employment sites. Furthermore, it is considered that this approach will lend itself to the flexible development of the client's land at Waterside Way which is a significant site which could be a key contributor towards meeting the Council's economic development strategy.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 239/2/6 Name: Duncan Investments Ltd - Houghton Gate	Refers to: Policy 18	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Duncan Investments Ltd objects to the overall policy approach taken in Chapter 8 as it fails to adequately and positively plan for new employment investment in line with the recommendations of the Council's own evidence base. Duncan Investments Ltd considers that employment land should be allocated in the NLP2 to ensure that future economic growth needs are adequately met. The demand for B-Class development is recognised within the NLP2 [para 8.10] which notes that: "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 comparison. Class B uses (offices, general industrial, storage and warehousing) provide a substantial proportion of Northampton's employment, but an increasing proportion of	Suggested changes: Duncan Investments Ltd considers that employment land should be allocated in the NLP2 to ensure that future economic growth needs are adequately met.	Officer comments: Allocations for employment are included in Policy 38. Policy 17 safeguards existing employment land and Policy 18 supports employment provision outside of safeguarded employment sites that meet certain criteria. Employment land is

			employment occurs in other uses, such as retail, leisure and the construction industry. 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.”		also expected to come forward on Sustainable Urban Extensions around Northampton. No modification required.
Representation reference: 239/2/7 Name: Duncan Investments Ltd - Houghton Gate	Refers to: Policy 18	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: 2.5 In order to meet this demand, the NLP2 is relying principally upon extensions, intensification, redevelopments and churn on safeguarded employment sites. However, it recognises that additional employment land will be required in order to support additional job creation. With regard to this matter it states: “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” 2.6 Whilst Duncan Investments Ltd welcomes the support in Policy 18 for new employment developments and schemes outside of safeguarded site to assist in meeting this requirement, this policy approach does not provide enough certainty or flexibility to ensure that job creation targets will be met.	Suggested changes: None specified.	Officer comments: Allocations for employment are included in Policy 38. Policy 17 safeguards existing employment land and Policy 18 supports employment provision outside of safeguarded employment sites that meet certain criteria. Employment land is also expected to come forward on Sustainable Urban Extensions around Northampton. No modification required.
Representation reference: 239/2/8 Name:	Refers to: Policy 18	Legal compliance and soundness: Plan is legally compliant.	Comments: We consider that the policy approach in the NLP2 is fundamentally flawed as it does not seek to allocate any new employment sites., despite the evidence base supporting such allocations. The NLP2 fails to identify strategic sites, for local	Suggested changes: None specified.	Officer comments: Allocations for employment are included in Policy 38. Policy 17

<p>Duncan Investments Ltd - Houghton Gate</p>		<p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>and inward investment to match the strategy and to meet anticipated needs over the plan period as required by the Framework.</p> <p>Unless the position is addressed through the preparation of the NLP2, there will be serious implications for growth and it will potentially restrict the potential for economic growth and job creation. This is a matter of key significance that Duncan Investments Ltd considers should be addressed through the preparation of the NLP2 if it is to create the right policy framework to drive economic growth.</p>		<p>safeguards existing employment land and Policy 18 supports employment provision outside of safeguarded employment sites that meet certain criteria.</p> <p>Employment land is also expected to come forward on Sustainable Urban Extensions around Northampton. No modification required.</p>
<p>Representation reference: 239/2/11</p> <p>Name: Duncan Investments Ltd - Houghton Gate</p>	<p>Refers to: Policy 18</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Duncan Investments Ltd considers that Policy 18 would not meet the tests of soundness because: 1. It is not positively prepared: clarification is required on the detail which would be required in order to satisfy the provisions of the policy.</p>	<p>Suggested changes: In order to ensure that Policy 18 is sound it is considered that: 1. Explanatory text should be provided with the policy to confirm what details would need to be provided in the comprehensive assessment required to demonstrate the suitability of sites for employment.</p>	<p>Officer comments: A comprehensive assessment for proposed new employment provision should address points i) and ii) of Policy 18. No modification required.</p>

<p>Representation reference: 229/1/22</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 19</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: How will this be impacted by the amendment to the Use Classes Order?</p>	<p>Suggested changes: This policy requires significant amendments in light of the amendment to the Use Classes order.</p>	<p>Officer comments: It is agreed that the policy will need to be updated. Modify Policy 19 to reflect changes to the use class order.</p>
<p>Representation reference: 237/1/3</p> <p>Name: Universities Superannuation Scheme</p>	<p>Refers to: Policy 19</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not effective - not consistent with national policy</p>	<p>Comments: Draft Policy 19 “New Retail Developments and Retail Impact Assessment” of the Northampton Local Plan Part 2 (Proposed Submission) currently proposes that Retail Impact Assessments (RIA) are required for any proposals exceeding 500 sq m outside designated town centres, in order to demonstrate the proposals will not have an unacceptable impact on existing centres in the retail hierarchy. Paragraph 89 of the National Planning Policy Framework (2019) (NPPF) sets a default threshold of 2,500 sq m for RIAs for retail proposals outside designated town centres, if there is not a locally set threshold.</p>	<p>Suggested changes: Whilst it is important to protect established town centres, for the following reasons, it is recommended that the threshold set in draft Policy 19 is amended to 2,500 sq m, in line with the NPPF.</p>	<p>Officer comments: Northampton Borough Council is allowed to set a local threshold and the Nexus study concluded that the 500sqm threshold was required.</p>
<p>Representation reference: 237/1/5</p> <p>Name: Universities Superannuation Scheme</p>	<p>Refers to: Policy 19</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p>Comments: As of 1 September 2020, an amendment to the Use Classes Order Regulations has been brought into effect, which fundamentally changes the approach to the flexibility of uses, and how town centres can expected to be used in the future. It is recognised that Local Planning Authorities and the Planning Inspectorate are considering how these changes will be</p>	<p>Suggested changes: If the Council is minded to retain the existing RIA threshold, then the draft Policy 19 wording should be</p>	<p>Officer comments: Policy 19 is clear that all relevant applications that meet this threshold will need to provide a Retail Impact</p>

		<ul style="list-style-type: none"> - not positively prepared - not effective - not consistent with national policy 	<p>accommodated in emerging local plans. Following these changes, some planning inspectors (South Oxfordshire) have advised that a RIA threshold of 500 sq m may turn out to be ineffective and that this is a new situation that needs to be monitored. The approach sought is amended policy wording that provides the Council with flexibility to adjust the RIA threshold in light of future circumstances.</p> <p>The full implications of the changes made to the Use Classes Order Regulations are currently uncertain, however it is necessary that the draft Policy 19 wording takes a positive and forward looking approach to how buildings and land will be used in future. In order to provide flexibility for landlords to respond to market and consumer changes, and to minimise levels of vacancy across the whole of the authority, including existing out of town locations, it is recommended that the Plan is consistent with the threshold contained in the NPPF.</p>	<p>amended in order to make it clear that RIA requirements will be undertaken in a proportionate and appropriate way, commensurate to the scale of the development proposed, in line with Government guidance.</p>	<p>Assessment. No modifications required.</p>
<p>Representation reference: 245/1/3</p> <p>Name: Draper Property Northampton Ltd</p>	<p>Refers to: Policy 19</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: It is noted that the policy states they support the provision of between 7,000sqm and 8,900sqm net convenience retail floorspace and between 5,300sqm and 7,300sqm net comparison retail floorspace to meet forecast retail expenditure to 2029. However, it is considered that such a policy requirement is overly restrictive on retail provision within suitable town, district and local centre locations, which are deemed the most appropriate locations for retail development.</p> <p>By imposing such a strict requirement for the total retail floorspace within the hierarchy of retail centres, which are considered the most suitable location for retail provision, it will prevent the Council from adapting to evolving circumstances within town centres and the retail sector, particularly considering the impacts of COVID-19 are not yet known. Elsewhere in the Proposed Plan, the Council encourage a mix of uses within town centres (Policy 9, 12 and 21). Insisting that</p>	<p>Suggested changes: This part of the policy should therefore be amended to remove any quantifiable provision of floorspace with a more flexible approach adopted directing new retail development to the hierarchy of centre locations.</p>	<p>Officer comments: The policy is intended to demonstrate and quantify the capacity of retail floorspace required during the lifetime of the plan, in accordance with the evidence base provided in the Retail Study (Nexus, 2018).</p>

			the above floorspace requirements are met may prevent suitable alternative uses coming forward preventing a mix of uses in town centres and inadvertently, negatively impacting on the vibrancy and vitality of these centres.		
<p>Representation reference: 245/1/4</p> <p>Name: Draper Property Northampton Ltd</p>	<p>Refers to: Policy 19</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In terms of the remaining parts of the policy, the last bullet point states that the “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”.</p> <p>This part of the policy is once again considered overly restrictive and could potentially lead to numerous vacant units within town centres lying empty for a considerable period of time. Moreover, this could potentially exacerbate any concerns regarding town centres in a post-COVID situation.</p>	<p>Suggested changes: A more flexible approach [to policy 19] by removing the need for a specific period of marketing (which appears to be excessive in a recovering economy) will ensure that the Council can support proposals for alternative uses at vacant properties or properties due to become vacant without properties potentially sitting vacant for more than 2 years (to allow for 18 months vacancy and marketing, obtaining planning permission and implementing the use/development). Such an approach could significantly</p>	<p>Officer comments: This policy seeks to provide a balanced approach between ensuring that there remains an acceptable supply of retail spaces within the Primary Shopping Area but at the same time allow for change of use subject to evidence of marketing. Combining the outcome of both the consultation exercises and the evidence base provided by Nexus (Retail Study 2018), this timescale is considered to be acceptable.</p>

				jeopardise the recovery and regeneration of town and district centres throughout the local authority area.	
<p>Representation reference: 245/1/5</p> <p>Name: Drapery Property Northampton Ltd</p>	<p>Refers to: Policy 19</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: It must also be noted that Policy 21 supports the delivery of residential accommodation on upper floors in town centres; Policy 12 supports the development of a mix of main town centre and residential uses in town centres; and Policy 9 supports the regeneration of sites within the town centre which will deliver opportunities for housing and economic development for the benefit of Northampton’s residents and the local economy. If town centre properties are required to remain vacant for a period of at least 12-18 months, with suitable marketing, it would seriously impact the Council in achieving their overall aims of the Local Plan and directly contradict other proposed policies which seek to ensure a range of uses, which will ultimately lead to a healthy and vibrant town centre.</p>	<p>Suggested changes: While we would suggest that this policy should be amended to remove the period of marketing/vacancy required altogether, as a minimum, the policy should be amended to distinguish between vacant units at ground floor level and vacant units/properties which also comprise upper floors. For example, proposals which seek to retain ground floor retail in a vacant property and provide upper floor</p>	<p>Officer comments: This policy seeks to provide a balanced approach between ensuring that there remains an acceptable supply of retail spaces within the Primary Shopping Area but at the same time allow for change of use subject to evidence of marketing. Combining the outcome of both the consultation exercises and the evidence base provided by Nexus (Retail Study 2018), this requirement is considered to be acceptable.</p>

				<p>alternative/residential use should not be required to achieve the same marketing/vacancy criteria as a vacant ground floor unit which seeks a change of use from retail. The former will ensure that primary retail frontages within town centres remain active while introducing new housing/residential accommodation on upper floors which is both supported by other policies and will enhance the vitality and viability of town centres. If such proposals at retail units comprising multiple floors are required to demonstrate that the unit has remained vacant/been marketed it may not only result in long-standing</p>	
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				vacant units at key parts of the town centre, but sites which are considered suitable for residential accommodation not coming forward for a significant period exacerbating both town centre and housing issues in the city. The policy therefore should be amended to note that proposals which seek to change the use of upper floors to residential uses while retaining ground floor retail will be supported by the Council.	
<p>Representation reference: 62/1/6</p> <p>Name: Northamptonshire County Council / North Northants JPU</p>	<p>Refers to: Policy 20</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: We fully support the inclusion of policy 20 in relation to hot food takeaways. While it will not solve the Borough's obesity problems on its own, this is an important policy that will support the local approach to addressing poor diet and obesity, which are formally acknowledged by health sector partners as significant health and wellbeing problems. It responds directly to the specific problems that have been identified in Northampton Borough in relation to people being overweight / obese, including approx. one third of children being overweight or obese by school year 6 and over 60% of</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			<p>the adult population being overweight or obese. It will form a small but important part of the 'whole systems approach to obesity' being taken by Public Health and its partners to address the many factors that influence whether people and communities are able to maintain a healthy diet and a healthy weight.</p> <p>This has been an effective approach taken in other parts of the country and has been accepted as an appropriate policy approach to respond to local challenges in relation to this key health and wellbeing issue.</p>		
<p>Representation reference: 113/1/21</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 23</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: We do not believe the Plan to be justified by evidence or effective in dealing with Sports pitches and amenity space, specifically in relation to the following policies: Policy 6 – Health and Wellbeing, Policy 23 – Sports facilities, and playing pitches Policy 28 – Providing open space East Hunsbury is an area without sports pitches and future developments should be required to make provision for community access.</p> <p>There are many in our community who are, or have been, members of Welland Valley Football Club over the years, and the parish council are concerned that the location of the football pitches (off of Ladybridge Drive (Wootton Brook) is not classified as Amenity Green Space. The land has been used as pitches for a number of years and is a prime example of an area of land which should be maintained as amenity green space.</p> <p>The Parish Council would expect that any planning application for development of sites within East Hunsbury would include provision of open space, sports and recreation facilities, and suitable measures to ensure the maintenance of these spaces for the future. The use of management companies has created an unnecessary burden for residents in other areas, and other ways of managing open space should be encouraged.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 seeks to encourage healthy lifestyles through a variety of policies (6, 23 and 28). Policy 23 sets out that development resulting in the loss the loss of existing sports related community facilities, which is well used and valued, will only be acceptable if adequate alternative provision exists. Policy 28 of the LPP2 requires new major development to sustain or enhance open spaces, and contribute to open space provision as</p>

					set out in the standards in Policy 28. It is agreed that there is evidence to suggest that the area in Welland Valley FC (Off Ladybridge Drive) should be designated as Amenity Green Space. Modify the Policies Map accordingly.
<p>Representation reference: 229/1/23</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 23</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The policy states “The loss of an existing sports related community facility will only be acceptable if there is existing adequate provision and all reasonable efforts have been made to preserve the facility, but it has been proven that it is not economically viable to be retained.” This element of the policy is inconsistent with the approach given in part c) of Policy 23 Sports Facilities and Playing Pitches, which promotes the idea of providing alternative provision. The loss of an existing sports related community facility, which is well used and valued, does not afford the idea of replacing an existing sports related community facility to provide at least an adequate alternative provision, as referred to in paragraph 97 of the NPPF.</p> <p>There is no mention in the policy that a major Development can contribute to upgrading existing facilities. There is also no mention of relocating facilities that could actually place them in a better catchment area to serve the existing and future occupants of sites in Northampton.</p>	<p>Suggested changes: Modification of policies. “For larger scale SUEs, the level and type of open space, sport and recreational facilities will be the subject to agreement between the Council and the Applicant” and within policy 27 “A site of equivalent quality and accessibility can be provided, prior to the use of the</p>	<p>Officer comments: The first part of Policy 23 relates to 'sports facilities and playing pitches' and the second part to 'an existing sports related community facility'. The policy goes onto state that 'major developments are expected to contribute to towards providing facilities'; this could be on or off-site. No modification required.</p>

			<p>Where it is not appropriate to create new on-site open space, where viable and in accordance with an obligations SPD, consideration should be given to the potential for new housing Developments to contribute towards the enhancement of nearby off- site open space and recreational facilities.</p> <p>The policy is inconsistent with national policy and is not positively prepared by virtue of not considering that an adequate alternative provision can be provided elsewhere and acknowledging that major development can contribute to the upgrading of existing facilities proportionately within S106 agreements.</p>	existing site ceasing"	
<p>Representation reference: 249/1/2</p> <p>Name: Sport England</p>	<p>Refers to: Policy 23</p>	<p>Legal compliance and soundness:</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments:</p> <p>To be consistent with national planning policy framework paragraph 97 the policy should refer to playing field not playing pitches. It is also unclear why the types of pitch sports have been listed as this is restrictive with other sports considered to be capable of being a pitch sport, which should be considered as part of Policy 23.</p> <p>The policy is also not effective as it is unclear as to which types of facilities the second bullet point would relate to and whether it would be consistent with NPPF paragraph 97.</p> <p>It should also be noted that the Plan makes references to the a Playing Pitch Strategy which was completed in early 2018. The document should be kept up to date to be considered to be a sound.</p>	<p>Suggested changes: Proposed change to to change "playing pitches" to "playing fields".</p>	<p>Officer comments: Minor modification of Policy 23 proposed to change "playing pitches" to "playing fields".</p>
<p>Representation reference: 249/1/3</p> <p>Name: Sport England</p>	<p>Refers to: Policy 23</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments:</p> <p>Policy 23 should refer to playing fields and not playing pitches. Possibly define types of facilities.</p> <p>It should also be noted that the Plan makes references to the a Playing Pitch Strategy which was completed in early 2018. The</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	document should be kept up to date to be considered to be a sound.		
Representation reference: 197/1/4 Name: Northamptonshire County Council	Refers to: Policy 25	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: The County Council welcomes inclusion of Policy 25 – Childcare Provision which seeks to ensure the sufficient supply of childcare, including for pupils of Early Years education age, is strategically managed. The background to the policy notes that whilst some areas indicate a current sufficiency of supply, this is likely to be impacted as housing delivery accelerates throughout the plan period. Furthermore, as a result of parents opting to select providers closer to workplaces than their homes for convenience, the pattern of demand may not always relate directly to the location of new housing development, but may also be attributed to new commercial schemes coming forward.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 197/1/5 Name: Northamptonshire County Council	Refers to: Policy 25	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: It will therefore 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. The text of Policy 21 should therefore be amended to recognise this.	Suggested changes: The text of Policy 21 should therefore be amended to recognise this.	Officer comments: This requirement is covered in policy 37.
Representation reference: 163/1/3 Name: Ann Plackett	Refers to: Policy 26	Legal compliance and soundness: Plan is legally compliant.	Comments: Although the revised policy recognises the need for an ecological assessment, it does not recognise the need for a management plan to protect/ enhance the biodiversity interest of the Kingsthorpe site, as set out in my original	Suggested changes: The following change is proposed: 'Ecological assessments should	Officer comments: There is no evidence to suggest that a management plan is essential to the

		Plan is unsound: - not effective - not consistent with national policy	representation. This will need to address the protection of the badger set and fox den, as well as the retention of some of the old grassland. The preparation of a management plan would be in line with the NPPF 2019 paragraphs 174b) and 175d). As well as protecting the biodiversity interest of the proposed extension, there is scope for improving the biodiversity of the previous extension onto the former allotments.	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 biodiversityand management plans should be prepared to protect and achieve a net gain in biodiversity on the proposed extensions and within the existing burial sites.'	production of an ecological assessment. No modification required.
Representation reference: 241/1/7 Name: British Horse Society	Refers to: para. 10.4	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Historic landscapes - Public Rights of Way are largely historical routes which require maintenance and enhancement for the benefit of all user groups. Determining under-recorded routes before the 1 January 2026 cut-off date is imperative to improve the network and opportunities for walkers, cyclists and pedestrians to choose active leisure pursuits.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 75/1/11	Refers to: Policy 27	Legal compliance and soundness:	Comments:	Suggested changes: We therefore feel that this policy	Officer comments: Policy 27 of the LPP2 requires

<p>Name: Town Centre Conservation Area Advisory Committee</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>We note that the NPPF (170(d)) requires planning policies and decisions to enhance the local and natural environment by minimising impacts and providing net gains in biodiversity.</p>	<p>should be strengthened, by amending the first sentence of paragraph 2 to: “All housing developments of 15 dwellings or more will be expected to deliver a net gain in biodiversity, and to deliver and / or contribute to the green infrastructure projects.”</p>	<p>development to contribute to Green Infrastructure projects. Policy 29 of the LPP2 requires development of offset the loss and secure a net gain in biodiversity. No modification required.</p>
<p>Representation reference: 229/1/24</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 27</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The policy does not afford the ability to consider large scale Sustainable Urban Extension’s need to provide bespoke/tailored open spaces that form Green Infrastructure. There may well be the need to provide more quantum of one particular type of open space compared to other typologies on large SUEs. For example, there maybe a need to provide general amenity open space above the quantum required in order to avoid occupants of the Development travelling to wooded areas that are covered under SPAs, but the amount of play space could be offset if there is an abundance of playing fields close by.</p>	<p>Suggested changes: The policy needs to be more explicit in what forms of connectivity are expected from an application to “improve connectivity” as this can undermine the viability of a project.</p>	<p>Officer comments: The NPPF is clear throughout that Green Infrastructure (GI) is required to mitigate impacts of climate change and to promote health and wellbeing. Specific GI Projects are outlined in the Northampton GI Plan. On developments of 15 or above applicants should demonstrate how they will deliver / contribute to GI projects. No</p>

					modification required.
<p>Representation reference: 229/1/25</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 27</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The policy states that all housing Developments of 15 dwellings or more will be expected to deliver and/or contribute to the green infrastructure projects. A brownfield site of 15 or more dwellings within an urban area could not be expected to deliver a green infrastructure project and a question of reasonableness will need to be applied if it needs to contribute towards GI projects.</p> <p>The policy is not effective as it doesn't have the ability to consider what bespoke/tailored open spaces that form GIs might be required for large scale SUEs. The policy has not justified why there needs to be a contribution to green infrastructure projects at a trigger of 15 or more dwellings and is also not effective in this regard, because it hasn't considered the likelihood that brownfield sites could occur within an urban area where physical provision would be difficult.</p>	<p>Suggested changes: Modification to the policy: ".. Will be expected to deliver and or contribute to the green infrastructure, where required to do so, through negotiations with the Council and the Applicant. "A green infrastructure strategy/plan to illustrate how green infrastructure is integrated within the Development can include x,y,z, types of open spaces. The Council will assess the merits of this strategy, in relation to:- • the physical ability to connectivity to the existing Local Green Infrastructure</p>	<p>Officer comments: The NPPF is clear throughout that Green Infrastructure (GI) is required to mitigate impacts of climate change and to promote health and wellbeing. Specific GI Projects are outlined in the Northampton GI Plan. On developments of 15 or above applicants should demonstrate how they will deliver / contribute to GI projects. No modification required.</p>

				<ul style="list-style-type: none"> • the landownership requirements to connect to existing Local Green Infrastructure • the scale of development and • the implications upon the viability of the scheme” 	
<p>Representation reference: 113/1/22</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 28</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: We do not believe the Plan to be justified by evidence or effective in dealing with Sports pitches and amenity space, specifically in relation to the following policies: Policy 6 – Health and Wellbeing, Policy 23 – Sports facilities, and playing pitches Policy 28 – Providing open space East Hunsbury is an area without sports pitches and future developments should be required to make provision for community access. There are many in our community who are, or have been, members of Welland Valley Football Club over the years, and the parish council are concerned that the location of the football pitches (off of Ladybridge Drive (Wootton Brook) is not classified as Amenity Green Space. The land has been used as pitches for a number of years and is a prime example of an area of land which should be maintained as amenity green space. The Parish Council would expect that any planning application for development of sites within East Hunsbury would include provision of open space, sports and recreation facilities, and suitable measures to ensure the maintenance of these spaces for the future. The use of management companies has created an unnecessary burden for residents in other areas, and other ways of managing open space should be encouraged.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 seeks to encourage healthy lifestyles through a variety of policies (6, 23 and 28). Policy 23 sets out that development resulting in the loss the loss of existing sports related community facilities, which is well used and valued, will only be acceptable if adequate alternative provision exists. Policy 28 of the LPP2 requires new major development to sustain or enhance open spaces, and contribute to open space provision as</p>

					set out in the standards in Policy 28. It is agreed that there is evidence to suggest that the area in Welland Valley FC (Off Ladybridge Drive) should be designated as Amenity Green Space. Modify the Policies Map accordingly.
Representation reference: 226/1/3 Name: Brian Oldham	Refers to: The Plan, policies map and new classification	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: I would request that the land on the Policies Map immediately adjacent to Policies LAA 1140, LAA 1025, and LAA 1122, should be registered as Classified and not Unclassified as the map illustrates. This piece of land has football pitches on it which are still in use, and is also used as a Community Space for sporting events for the immediate and wider Community at large and should be protected as such. Therefore I would strongly urge that the Local Plan - Part 2 for this piece of land is modified to read as Classified and not Unclassified.	Suggested changes: 1 would request that the land on the Policies Map immediately adjacent to Policies LAA 1140, LAA 1025, and LAA 1122, should be registered as Classified and not Unclassified as the map illustrates.	Officer comments: The policies map will be updated accordingly.
Representation reference: 244/1/24 Name: Bastion Group	Refers to: Policy 28	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Bastion support this policy and the provision of requisite open space as part of development given the value green infrastructure provides for sustainability, ecology, landscape integration, drainage as well as for health and well-being. However, Bastion also acknowledge that different scales of	Suggested changes: None.	Officer comments: Noted.

			<p>development and sites will better accommodate different types of open space. From a management and maintenance perspective, higher order public open spaces need to be of a certain scale to facilitate effective management regimes. In this context, Bastion fully support the reference to contributing towards offsite provision where standards cannot be met on site and consider this is vital to the soundness of this policy.</p> <p>It is also important to ensure that accessibility standards and considered alongside quantity standards as Northampton has a wealth of excellent parks and open spaces and it is essential that their use is maximised to support their ongoing maintenance and management. Accessibility to existing spaces should be taken into account in determining whether on-site provision is necessary for small / medium scale development.</p>		
<p>Representation reference: 30/1/2</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments: Section 2: I was pleased to note that the policy describes a hierarchy of sites and biodiversity assets. However the list does not include Potential Wildlife Sites (PWS) or Local Geological Sites. Some PWS are former Local Wildlife Sites (LWS) which have deteriorated and at last survey date no longer qualified. Others are sites which are suspected to have some biodiversity value but have not been surveyed. PWS are not usually of the same ecological quality as LWS but occasionally surveys have revealed them to be of as much as SSSI quality. Applicants need to know PWS exist and may have significant value so should be included in Policy 29.</p> <p>The term 'undesigned sites' is not particularly meaningful in biodiversity terms (unlike undesigned heritage assets). I would suggest the term 'other biodiversity assets', which would reflect terminology used in the Biodiversity SPD.</p>	<p>Suggested changes: Section 2: I was pleased to note that the policy describes a hierarchy of sites and biodiversity assets. However the list does not include Potential Wildlife Sites (PWS) or Local Geological Sites. Some PWS are former Local Wildlife Sites (LWS) which have deteriorated and at last survey date no longer qualified. Others are sites</p>	<p>Officer comments: It is agreed Policy 29 should include reference to Potential Wildlife Sites and there should be an alteration to wording of Policy 29 to remove 'undesigned sites' and replace with 'Other biodiversity assets'.</p>

				<p>which are suspected to have some biodiversity value but have not been surveyed. PWS are not usually of the same ecological quality as LWS but occasionally surveys have revealed them to be of as much as SSSI quality. Applicants need to know PWS exist and may have significant value so should be included in Policy 29.</p> <p>The term 'undesigned sites' is not particularly meaningful in biodiversity terms (unlike undesignated heritage assets). I would suggest the term 'other biodiversity assets', which would reflect terminology used in the Biodiversity SPD.</p>	
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<p>Representation reference: 30/1/3</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments: Section 3: This section refers to cumulative impacts, which must be considered in development subject to Environmental Impact Assessment (EIA) and the Habitats Regulations. I question whether the council has the authority to require consideration of cumulative impacts for development which is not subject to the EIA or Habitats Regulations.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: It is agreed the wording of Policy 29 should be altered to include wording in brackets () and removal of wording in []: All applicants are expected to assess the impacts of their proposals on biodiversity, (and) [including] indirect impacts such as recreational activities, [in combination impact of developments and any potential effects on functionally linked land to the respective site].</p>
<p>Representation reference: 30/1/4</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments: Similarly, this section also refers to impacts on functionally linked land, which is specific to the Special Protection Area and should not be included in a general biodiversity policy.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: It is agreed the wording of Policy 29 should be altered to include wording in brackets () and removal of wording in []: All applicants are expected to assess the impacts of their</p>

					proposals on biodiversity, (and) [including] indirect impacts such as recreational activities, [in combination impact of developments and any potential effects on functionally linked land to the respective site].
<p>Representation reference: 30/1/5</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments: The remainder of this section is confusing, and I would reiterate my comments on the previous draft local plan: applicants are not all expected to conduct ecological surveys as the wording implies. Applicants are expected to consult the Biodiversity SPD to find out whether and what surveys might be necessary. This requirement could be included in the policy as has been done in the North Northamptonshire Joint Core Strategy (Policy 4), which states that ‘development proposals will need to take account of the Northamptonshire Biodiversity Supplementary Planning Document...’ If this section is intended to refer to development affecting the SPA then this should clearly be indicated in the policy wording. As currently worded section 3 appears to apply to all development.</p>	<p>Suggested changes: The remainder of this section is confusing, and I would reiterate my comments on the previous draft local plan: applicants are not all expected to conduct ecological surveys as the wording implies. Applicants are expected to consult the Biodiversity SPD to find out whether and what surveys might be necessary. This requirement could be included in the policy as has been done in the North</p>	<p>Officer comments: It is agreed that the wording of Policy 29 should be altered to include wording in brackets (): ...Applicants will be required to (consider the the Northamptonshire Biodiversity SPD or sucessor document and where necessary) undertake up to date, comprehensive ecological surveys in accordance with industry guidelines and standards.</p>

				Northamptonshire Joint Core Strategy (Policy 4), which states that 'development proposals will need to take account of the Northamptonshire Biodiversity Supplementary Planning Document...' If this section is intended to refer to development affecting the SPA then this should clearly be indicated in the policy wording. As currently worded section 3 appears to apply to all development.	
<p>Representation reference: 30/1/12</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments: Overall while I believe the biodiversity policies have been improved they do appear to have been developed with limited ecological/natural environment input; they read as if they were written by non-specialists. It is crucial that these policies – and all policies in the local plan – are able to be used and delivered by officers. The wording must be clear and precise, and in my view Policies 29 and 30 in particular are not quite there yet.</p>	<p>Suggested changes: Noted.</p>	<p>Officer comments: The formulation of policies within the Local Plan have been formulated in partnership with neighbouring authorities, statutory bodies, comments from the general public and</p>

					from the Council's evidence base.
<p>Representation reference: 30/1/15</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness:</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments:</p> <p>Policy 29 Supporting and enhancing biodiversity</p> <p>Section 1: The proposed wording is not consistent with the wording or principle of paragraph 175 of the NPPF. Paragraph 175 establishes the mitigation hierarchy which requires development to 'avoid, adequately mitigate, or, as a last resort, compensate' biodiversity impacts. Policy 29 1) would require development to 'offset the loss', which presupposes biodiversity impacts and skips the 'avoid' and 'mitigate' stages of the mitigation hierarchy.</p> <p>Section 2: The list of designated sites does not include Potential Wildlife Sites (PWS) or Local Geological Sites. Some PWS are former Local Wildlife Sites (LWS) which have deteriorated and at last survey date no longer qualified. Others are sites which are suspected to have some biodiversity value but have not been surveyed. PWS are not usually of the same ecological quality as LWS but occasionally surveys have revealed them to be of as much as SSSI quality. Applicants need to know PWS exist and may have significant value so should be included in Policy 29.</p> <p>Section 3: This section refers to cumulative impacts, which must be considered in development subject to Environmental Impact Assessment (EIA) and the Habitats Regulations. I question whether the council has the authority to require consideration of cumulative impacts for development which is not subject to the EIA or Habitats Regulations. Similarly, this section also refers to impacts on functionally linked land, which is specific to the Special Protection Area and should not be included in a general biodiversity policy.</p> <p>Policy 30 Upper Nene Valley Gravel Pits Special Protection Area The commitment to prepare a mitigation strategy for the SPA is included in the supporting text only (paragraph 10.17): this should be included in the actual policy text.</p>	<p>Suggested changes: See other comments.</p>	<p>Officer comments: See responses to individual comments.</p>

			<p>Policy 38 Development allocations As described above it appears that at least some of the proposed allocations were not informed by the ecological evidence base, which includes designated sites</p> <p>Policy 41 The Green, Great Houghton (LAA1098) The seventh bullet refers to a buffer but does not indicate what is to be buffered, only where the buffer is to be located. I think some clarification is needed on this point for the policy to be deliverable by case officers.</p>		
<p>Representation reference: 53/1/8</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Policy 29 - Supporting and enhancing biodiversity Anglian Water welcomes the reference to development proposals providing a net gain in biodiversity.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 172/1/6</p> <p>Name: Homes England</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: As currently drafted the policy and supporting table refer to proposal offsetting loss of biodiversity. 'Offsetting' implies an offsite solution, yet it is often possible to deliver net gain on the same site.</p> <p>As such, the policy and supporting table in the plan do not meet the test of soundness through inconsistency with national policy which requires plans planning policies and decisions to contribute to and enhance the natural and local environment including by minimising impacts on and providing net gains for biodiversity (NPPF, 2019 Paragraph 170d).</p>	<p>Suggested changes: The policy and table should be reworded as follows: POLICY 29 SUPPORTING AND ENHANCING BIODIVERSITY 1. The Council will require all major development proposals [to secure a net gain] in biodiversity through the strengthening,</p>	<p>Officer comments: It is agreed that a proposed modification to the plan will clarify the policy. Modify Policy 29 to remove 'offset the loss and': The Council will require all major development proposals to secure a net gain in biodiversity through the strengthening, management and / or creation of new</p>

				<p>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.</p>	<p>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.</p> <p>Amend Table 12 to include wording in brackets:</p>
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				Table 12: Indicator: Biodiversity net gain Target: [Major developments must secure a net gain in biodiversity] Main Policy delivered: 29	Indicator: Biodiversity net gain Target: Major developments must secure a net gain in biodiversity Main Policy delivered: 29
<p>Representation reference: 200/1/42</p> <p>Name: HBF</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Policy 29 requires 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.</p> <p>The 2019 NPPF states that policies should be clearly written and unambiguous (para 16) so that both applicants and decision makers know how to react. The Council's policy approach should reflect the Government's proposals on biodiversity gain set out the Environment Bill. The Government will use the DEFRA Biodiversity Metric to measure changes to biodiversity under net gain requirements established in the Environment Bill. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays.</p> <p>The Government is committed to continued engagement with the housebuilding industry to address concerns and risks. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The Viability Assessment of the LPP2 has considered the requirements of Policy 29. No modification required with regards to this matter. It is agreed that a proposed modification to the plan will clarify Policy 29. Modify Policy 29 to include DEFRA Biodiversity Metric.</p>

			<p>housebuilding industry in order that net gain does not prevent, delay or reduce housing delivery. The significant additional costs for biodiversity gain should be fully accounted for in the Council's viability assessment. The DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies : Impact Assessment Table 14 : Net Gain Delivery Costs (Residential) sets out regional costs (based on 2017 prices) in East Midlands of £19,951 per hectare of development based on a central estimate but there are significant increases in costs to £69,522 per hectare for off-site delivery under Scenario C. These costs are not included in the Council's viability assessment. There may also be an impact on gross / net site acreage ratio.</p> <p>The Government will make provision in the Environment Bill to set a transition period of two years. The Government will work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, and will provide clear and timely guidance on understanding what will be required and when.</p>		
<p>Representation reference: 229/1/26</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: By the time the Local Plan Part 2 becomes adopted, the Environmental Bill will be made.</p> <p>This policy makes no reference to s. (90) part 6 of the impending Environmental Bill, which makes provision for biodiversity gain to be a condition of a planning permission (planning permission taken in the sense of s.57 of the Town and Country Planning Act). It would, therefore, be questionable as to whether the information required in this policy is necessary at application stage. There is the ability in the Environmental Bill for the Secretary of State to make arrangements in legislation for the Applicant to purchase a credit from the SOS for the purpose of meeting the biodiversity gain.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 29 does not state at what stage in the planning process an applicant should demonstrate a net gain in biodiversity, only that all major development proposals will need to offset the loss and secure a net gain in biodiversity. As the Environment Bill progresses and</p>

			Will NBC publish a Bio-diversity Land Register to which bio-diversity offsetting can occur?		further guidelines are produced NBC will make decisions on Biodiversity Land Registers at that stage. No modification required.
<p>Representation reference: 229/1/27</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Bill also refers to a local habitat map s.93(i) which will cover the whole strategy area or two or more local habitat maps. Has there been any cross boundary work on identifying what area the maps will cover? Presumably there will be a Bio-diversity SPD to accompany the Local Plan. The policy is not consistent with the impending legislation and no commentary has been provided which refers to cross boundary working and co-operation with neighbouring authorities with regard to bio-diversity.</p>	<p>Suggested changes: Modification The policy needs to incorporate the principles of the Environmental Bill and refer to the ability of bio-diversity offsetting and for the Applicant to purchase credits for the purposes of meeting bio-diversity gain.</p>	<p>Officer comments: NBC has an adopted Biodiversity SPD for Northamptonshire and Habitat Opportunity maps that link across boundaries. The LPP2 reflects the provisions of the Environment Bill. No modification required.</p>
<p>Representation reference: 246/1/3</p> <p>Name: Natural England</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: Policy 29 wording requires revision and strengthening. Point 1 and 2 within the policy are confusing.</p> <p>Whilst we welcome the inclusion of biodiversity net gain, for clarity we recommend a separate point within the policy addressing biodiversity net gain. Please note that biodiversity net gain compliments the mitigation hierarchy, it does not replace it. We would also recommend a reference to using the DEFRA biodiversity metric.</p>	<p>Suggested changes: We would therefore recommend that the mitigation hierarchy is detailed within this policy, please refer to paragraph 175 of the NPPF.</p>	<p>Officer comments: It is agreed that the following changes should be made to Policy 29 to include the following: The Council will require all major development proposals to avoid, adequately mitigate, or, as a last resort,</p>

			It is important that the policy clearly distinguishes the mitigation hierarchy from any biodiversity net gain requirements. This will help to set a transparent and auditable context within which developers can both assess their impacts and provide net gain.		compensate biodiversity impact and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats. Biodiversity net gain should be measured through the use of a recognised biodiversity calculator such as the Defra metric.
Representation reference: 246/1/4 Name: Natural England	Refers to: Policy 29	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective - not consistent with national policy	Comments: We also suggest the policy directs developers to the Northamptonshire Biodiversity SPD.	Suggested changes: We also suggest the policy directs developers to the Northamptonshire Biodiversity SPD.	Officer comments: Policy 29 has been amended to include reference to the Northamptonshire Biodiversity SPD.
Representation reference: 246/1/5 Name: Natural England	Refers to: Policy 29	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective - not consistent with national policy	Comments: The policy does not reflect the wording referred to within the Habitat Regulations Assessment Report, June 2020, "Development, whether individually or in combination, having an adverse effect on the integrity of the Upper Nene Valley Gravel Pits will be refused" This wording would be welcomed within Policy 29 and Policy 30.	Suggested changes: The policy does not reflect the wording referred to within the Habitat Regulations Assessment Report, June 2020, "Development, whether	Officer comments: The following wording in brackets [] has been removed from Policy 29. All applicants are expected to assess the impacts of their proposals on biodiversity,

				individually or in combination, having an adverse effect on the integrity of the Upper Nene Valley Gravel Pits will be refused” This wording would be welcomed within Policy 29 and Policy 30.	including indirect impacts such as recreational activities, [the cumulative impact of developments] and any potential effects on the functionally linked land.
<p>Representation reference: 251/1/22</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 29</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: Policy 29(1) proposed the following requirement: ‘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.’ NPPF Paragraph 16 states that policies should be ‘clearly written and unambiguous, so it is evident how a decision maker should react to development proposals’. The Council’s policy approach should reflect the Government’s proposals on biodiversity gain as set out the Environment Bill which proposes to utilise the DEFRA Biodiversity Metric to measure changes to biodiversity under net gain requirements. Such a mandatory requirement offers applicants a level playing field nationally and reduces the risk of unexpected cost and delay.</p>	<p>Suggested changes: Make reference to the DEFRA Biodiversity Metric.</p>	<p>Officer comments: It is agreed that reference to the Biodiversity Metric is acceptable. Modify Policy 29 accordingly.</p>

<p>Representation reference: 185/1/3</p> <p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>	<p>Refers to: para. 10.16</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted. The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p>Suggested changes: The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p>Officer comments: The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>
<p>Representation reference: 185/1/4</p> <p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>	<p>Refers to: para. 10.17</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted.</p>	<p>Suggested changes: The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p>Officer comments: The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>

<p>Representation reference: 185/1/5</p> <p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>	<p>Refers to: para. 10.18</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted.</p>	<p>Suggested changes: The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p>Officer comments: The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>
<p>Representation reference: 185/1/7</p> <p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>	<p>Refers to: para. 10.20</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted.</p>	<p>Suggested changes: The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p>Officer comments: The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>
<p>Representation reference: 185/1/8</p>	<p>Refers to:</p>	<p>Legal compliance and soundness:</p>	<p>Comments:</p>	<p>Suggested changes:</p>	<p>Officer comments:</p>

<p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>	<p>para. 10.21</p>	<p>Plan is legally compliant. Plan is sound.</p>	<p>This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted.</p>	<p>The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p>The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>
<p>Representation reference: 30/1/6 Name: Northamptonshire County Council</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments: The commitment to prepare a mitigation strategy for the SPA is included in the supporting text only (paragraph 10.17): this should be included in the actual policy text.</p>	<p>Suggested changes: The commitment to prepare a mitigation strategy for the SPA is included in the supporting text only (paragraph 10.17): this should be included in the actual policy text.</p>	<p>Officer comments: It is agreed that a proposed modification would confirm the Council's commitment to the mitigation strategy. Amend Policy 30 to include: The Local Planning Authority or successor authority will prepare a Mitigation Strategy document concerning the Upper Nene Valley Gravel Pits Special Protection Area with</p>

					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.
<p>Representation reference: 30/1/7</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments: 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 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.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: It is agreed that a minor modification, removing the reference to ped predation, will clarify the policy. Amend Policy 30 to remove wording in []: 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)</p>

					on the SPA and Ramsar site will not have a detrimental impact.
<p>Representation reference: 30/1/8</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments: The list of possible significant effects in the third paragraph is not policy and in my view does not belong here; I would suggest moving it to the supporting text.</p>	<p>Suggested changes: The list of possible significant effects in the third paragraph is not policy and in my view does not belong here; I would suggest moving it to the supporting text.</p>	<p>Officer comments: It is agreed that a proposed modification to remove the wording in [] in Policy 30 and place in supporting text would help clarify the policy: 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</p>

					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>Representation reference: 30/1/13</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments: Overall while I believe the biodiversity policies have been improved they do appear to have been developed with limited ecological/natural environment input; they read as if they were written by non-specialists. It is crucial that these policies – and all policies in the local plan – are able to be used and delivered by officers. The wording must be clear and precise, and in my view Policies 29 and 30 in particular are not quite there yet.</p>	<p>Suggested changes: Noted.</p>	<p>Officer comments: The formulation of policies within the Local Plan have been formulated in partnership with neighbouring authorities, statutory bodies, comments from the general public and from the Council's evidence base.</p>

<p>Representation reference: 53/1/9</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Policy 30 Upper Nene Valley Pits Special Protection Area - OBJECT (in part) - EFFECTIVE</p> <p>We note that Policy 30 has been amended to require major development proposals demonstrating that there would be no significant adverse effects on Upper Nene Valley Gravel Pits Special Protection Area and Ramsar site as a result of development proposals or cumulatively including from (additional) water abstraction and discharge from the foul drainage system.</p> <p>Anglian Water is supportive of the objective of the request for the modification to protecting the water environment particularly in relation to Upper Nene Valley Gravel Pits Special Protection area.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 53/1/10</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Water abstraction: we consider the reference to water abstraction is ineffective and unnecessary as water abstractions for public water supply are licensed by the Environment Agency and form part of the Water Resource Management Plan process rather than the determination of individual planning applications.</p> <p>Anglian Water is the water undertaker for Northampton Borough administrative area and is responsible for preparing as part of a statutory process a Water Resources Management plan (WRMP) at least once every 5 years and reviewed continuously which outlines how we will manage the supply/demand balance so that we can continue to serve our customers now and in the future in respect of population growth, climate change and environmental protection. Anglian Water's current WRMP 2019 covers the period 2020 to 2045 and has been approved by Defra.</p> <p>The WRMP is supported by a Habitats Regulation Assessment report and where necessary an Appropriate Assessment and is available to view at the following address:</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			<p>https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/</p> <p>Water resources are managed on a larger geographical scale than Councils and individual development proposals. For example the Ruthamford North Water Resource Zone (WRZ) includes Northampton Borough together with the supply systems for Peterborough, Wellingborough, Corby, Daventry and Kettering.</p> <p>The Environment Agency issues licenses to Anglian Water for the abstractions from both groundwater and surface water sources used for public water supply. As such the Environment Agency is the decision maker in respect of any changes to abstraction licenses in accordance with separate legislation (environmental permitting regulations) and directs Anglian Water where it is necessary to limit abstractions to protect water environment.</p> <p>Anglian Water is working closely with the Environment Agency (and Natural England) to ensure that our abstractions are sustainable. Abstraction in all areas where there is any risk of environmental deterioration will be capped at recent abstraction rates, and hence abstraction will not increase. This includes the Northampton Borough area.</p> <p>Water resources are sourced from across Anglian Water company area and water is conveyed between different areas by existing infrastructure. It is proposed that we will build on existing infrastructure by developing a more integrated strategic grid so that we can continue to serve our customers as part of the WRMP proposals. As part of which there will be a new potable water transfer is proposed from Lincolnshire to Ruthamford North WRZ.</p> <p>Anglian Water is also actively working with Water Resource East a partnership which brings together a range of organisations with an interest in water, energy, retail environment, land management and agriculture to develop a long-term, multi-sector water resource strategy for the East of England.</p>		
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<p>Representation reference: 53/1/11</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments:</p> <p>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.</p> <p>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). 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 Borough 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>Suggested changes:</p> <p>It is therefore proposed that Policy 30 is amended as follows - remove wording in brackets: '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</p>	<p>Officer comments:</p> <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</p>
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				<p>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> <p>INCLUDE: 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>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 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>
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<p>Representation reference: 185/1/9</p> <p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: This section of the Local Plan Part 2 highlights the importance of the Upper Nene Valley Gravel Pits Special Protected Area (SPA) as well as the existing and potential threats to it which could occur as a result of the Plan. It has been much improved from the previous version. A key part of the measures which are required to protect the SPA is the production and subsequent adoption of a mitigation strategy. Paragraph 10.17 (along with the Habitats Regulations Assessment Report) states that this will be produced within 12 months of the adoption of the Local Plan Part 2 with the broad principles and a draft agreed with Natural England before adoption. Whilst we are satisfied with this approach; we would like to stress that we do not consider the Local Plan Part 2 to be sound without the mitigation strategy in place. None of the allocations within 3km of the SPA should come forward until it is adopted.</p>	<p>Suggested changes: The mitigation strategy is a key document and we would urge that it is completed as soon as possible.</p>	<p>Officer comments: The timetable for the production and adoption of the Mitigation Strategy for the Upper Nene Valley Gravel Pits has been agreed with Natural England. No modification required.</p>
<p>Representation reference: 239/2/12</p> <p>Name: Duncan Investments Ltd - Houghton Gate</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Duncan Investments Ltd would like to take this opportunity to note that the implications of the Upper Nene Valley Gravel Pits SPA on the Houghton Gate site are currently being assessed by the site promoters in consultation with Natural England but there is no in principle objection to the development of the site subject to agreement on development scale and mitigation. Furthermore, migrating bird surveys carried out over the winter of 2018/2019 show that the site does not constitute supporting habitat. As the northern part of the site falls within the 250m SPA Buffer Zone, Natural England has advised that building heights in this northern area would be restricted and therefore this area will be the focus of open storage uses, site infrastructure, landscaping, drainage and biodiversity enhancement measures.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Policy 30 of the LPP2 relates to the Upper Nene Valley Gravel Pits SPA and Ramsar site and sets out how proposals will need to demonstrate no adverse impact on the SPA. In particular, new development within a 250m zone of the SPA must undertake an assessment to demonstrate that it will not have a significant adverse</p>

					effect on birds within the area or, if directly adjacent to existing buildings, should reflect building heights. NBC requests to see any assessment(s) undertaken so far that have been shared with Natural England including overwintering bird surveys.
<p>Representation reference: 239/2/13</p> <p>Name: Duncan Investments Ltd - Houghton Gate</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: 4.5 The explanatory text to Policy 30 notes 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 [para 10.18]. The allocation of the Houghton Gate site for employment development will help to assist in addressing this recreational pressure by reducing opportunities for residential development in close proximity to the site.</p>	<p>Suggested changes: For the above reasons, it is considered that the Houghton Gate site can be delivered in accordance with the requirements of Policy 30. A full assessment of the impacts of any scheme on the site and appropriate mitigation would be undertaken and submitted with a planning application.</p>	<p>Officer comments: The site was assessed as not being suitable for allocation. However, if a proposal comes forward, this will be determined through the normal development management process to assess if it conforms to the relevant policies in the development plan.</p>
<p>Representation reference: 244/1/25</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: The protection of the SPA is of fundamental importance and is supported by Bastion. It is important however, that this policy recognises that developments should not cause a detrimental</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Any proposal that comes forward which could</p>

Name: Bastion Group		Plan is sound.	impact, including taking account of the provision of appropriate mitigation. It will be necessary for developments with the 3km distance of the SPA to demonstrate that they do not have a detrimental impact under this policy, however, it is acknowledged that this may require securing appropriate mitigation. It is therefore important that the impact on the SPA is assessed as a residual impact, taking account potential mitigation. This should be clarified in the wording of the policy.		potentially affect the SPA will need to demonstrate conformity to Policy 30 of the Plan. No modification required.
Representation reference: 246/1/6 Name: Natural England	Refers to: Policy 30	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective - not consistent with national policy	Comments: The policy does not reflect the wording referred to within the Habitat Regulations Assessment Report, June 2020, "Development, whether individually or in combination, having an adverse effect on the integrity of the Upper Nene Valley Gravel Pits will be refused" This wording would be welcomed within Policy 29 and Policy 30.	Suggested changes: The policy does not reflect the wording referred to within the Habitat Regulations Assessment Report, June 2020, "Development, whether individually or in combination, having an adverse effect on the integrity of the Upper Nene Valley Gravel Pits will be refused" This wording would be welcomed within Policy 29 and Policy 30.	Officer comments: Agreed. Policy 30 has been modified to include the wording in brackets (): 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.
Representation reference: 246/1/7 Name: Natural England	Refers to: Policy 30	Legal compliance and soundness: Legal compliance: - not specified	Comments: The policy has not included a commitment to produce a mitigation strategy concerning the Upper Nene Valley Gravel Pits SPA. As stated within our previous advice, the mitigation	Suggested changes: This should be written within the policy.	Officer comments: Agreed. Suggested inclusion at the end of Policy 30:

		Plan is unsound: - not effective - not consistent with national policy	strategy must be agreed prior to the adoption of the plan to satisfy Habitat Regulations requirements.		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.
Representation reference: 246/1/8 Name: Natural England	Refers to: Policy 30	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective - not consistent with national policy	Comments: The policy states “..major development within close proximity of the SPA...” All projects and plans within close proximity 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.	Suggested changes: The policy states “..major development within close proximity of the SPA...” All projects and plans within close proximity of the SPA, are required to demonstrate no significant effect on the SPA, in	Officer comments: Agreed. Suggested addition to Policy 30 in brackets() and removal of wording in brackets []: Proposals for (all) [major] developments within close proximity of the SPA will need to demonstrate through the

				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.	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).
<p>Representation reference: 246/1/10</p> <p>Name: Natural England</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: At times the policy introduces additional unnecessary wording, such as in the third paragraph ‘and the species for which the land is designated’ where the paragraph has already included the test of adverse effects on site integrity (it is not clear what that wording is seeking to achieve).</p>	<p>Suggested changes: At times the policy introduces additional unnecessary wording, such as in the third paragraph ‘and the species for which the land is designated’ where the paragraph has already included the test of adverse effects on site integrity (it is not clear what that wording is seeking to achieve).</p>	<p>Officer comments: It is seeking to protect the SPA and its associated protected species. No modification required.</p>

<p>Representation reference: 246/1/11</p> <p>Name: Natural England</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: Also we assume that reference to 'close proximity' is meant to mean 'within 3km'.</p>	<p>Suggested changes: Also we assume that reference to 'close proximity' is meant to mean 'within 3km'.</p>	<p>Officer comments: It is agreed that the policy should be modified to clarify the Council's position. Modify Policy 30 to state that close proximity means that it should be within 3 km.</p>
<p>Representation reference: 246/1/12</p> <p>Name: Natural England</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: Finally, the policy uses the term 'supporting habitat' where in our view the term 'functionally linked land' would be more appropriate to refer to land outside the SPA boundary which supports SPA notified species (such as lapwing and golden plover).</p>	<p>Suggested changes: Finally, the policy uses the term 'supporting habitat' where in our view the term 'functionally linked land' would be more appropriate to refer to land outside the SPA boundary which supports SPA notified species (such as lapwing and golden plover).</p>	<p>Officer comments: Agree: Change wording in Policy 30 from 'supporting habitat' to 'functionally linked land'.</p>
<p>Representation reference: 246/1/15</p> <p>Name: Natural England</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: Natural England would like to remind your Authority that mitigation measures must offer certainty that they will be successful, and that they are in place and created ahead of the anticipated adverse effect arising. This will ensure that there is no temporal shortfall in habitat availability.</p> <p>Without the Upper Nene Valley Gravel Pits SPA mitigation strategy in place to address recreational pressure by the time of Plan adoption, associated with the lack of detail regarding</p>	<p>Suggested changes: Natural England would like to remind your Authority that mitigation measures must offer certainty that they will be successful, and that</p>	<p>Officer comments: The issue of SANG can be addressed in the Mitigation Strategy.</p>

			<p>the provision of a SANG, Natural England currently is not confident that mitigation measures will be able to address recreational pressure impacts to the Upper Nene Valley Gravel Pits SPA.</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). Further information regarding SANGS can be provided if necessary, but the Council should take its steer from the Thames Basin Heaths SPA SANG approach which establishes key principles.</p>	<p>they are in place and created ahead of the anticipated adverse effect arising. This will ensure that there is no temporal shortfall in habitat availability.</p> <p>Without the Upper Nene Valley Gravel Pits SPA mitigation strategy in place to address recreational pressure by the time of Plan adoption, associated with the lack of detail regarding the provision of a SANG, Natural England currently is not confident that mitigation measures will be able to address recreational pressure impacts to the Upper Nene Valley Gravel Pits SPA.</p>	
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				<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). Further information regarding SANGS can be provided if necessary, but the Council should take its steer from the Thames Basin Heaths SPA SANG approach which establishes key principles.</p>	
<p>Representation reference: 246/1/16</p>	<p>Refers to: Policy 30</p>	<p>Legal compliance and soundness: Legal compliance:</p>	<p>Comments:</p>	<p>Suggested changes: Noted.</p>	<p>Officer comments: To mitigate potential effects on</p>

<p>Name: Natural England</p>		<p>- not specified</p> <p>Plan is unsound: - not effective - not consistent with national policy</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>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.</p>		<p>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.</p>
<p>Representation reference: 75/1/10</p> <p>Name: Town Centre Conservation Area Advisory Committee</p>	<p>Refers to: Policy 31</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: In our experience, many applications do not recognise and promote the characteristic vernacular and features of conservation areas, which create and maintain the character which the designation seeks to protect. Therefore, add a new bullet point “Conforms to design codes and distinctive features identified for conservation areas, e.g. in each Conservation Area appraisal”.</p>	<p>Suggested changes: - Add “views” to the important aspects listed under the fourth bullet point.</p>	<p>Officer comments: Policy 31 of the LPP2 seeks to protect and enhance the designated and non-designated heritage assets, including understanding their settings, within Northampton. Northampton Borough Council has Conservation Area Appraisals and Management Plans to guide development within each respective CA. Policy BN5 of the West Northamptonshire joint Core Strategy also requires developments to</p>

					contribute to the character of the area, including CA's. No modification required.
<p>Representation reference: 240/1/3</p> <p>Name: Spring Boroughs Neighbourhood Voice</p>	<p>Refers to: Policy 31 and general</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: With reference to the Castle House site. We note this is not referenced in the Local Plan. We would like it to be, with reference to the Spring Boroughs Neighbourhood plan. We have a vision that this area is opened up in such a way as to integrate the heritage sites surrounding it, while incorporating much needed housing. The housing we envision would be in keeping with the rest of Spring Boroughs, that is social housing, possibly for older residents as a move on, thus freeing up larger family homes for the next generation.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The Local Plan Part 2 refers to neighbourhood plans. Any proposal that comes forward will need to comply with all the policies contained in the relevant development plans including Spring Boroughs Neighbourhood Plan as well as heritage related policies in all development plans. It is not therefore considered necessary to include a reference to the Castle House site.</p>
<p>Representation reference: 68/1/12</p> <p>Name: Highways England</p>	<p>Refers to: para. 11.3</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments: In relation to further transport infrastructure improvements the plan states that the Council will work together with Highways England 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. We welcome this approach and will engage with the Council on developments which impact the SRN.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

<p>Representation reference: 248/1/8</p> <p>Name: Welland Valley Rail</p>	<p>Refers to: para. 11.4</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not effective</p>	<p>Comments: 11.4 Clearly the county level transportation plan (2012) is out of date and does not reflect current sustainability objectives. The borough should ensure new West Northamptonshire unitary council prioritises review of the transport plan to include current sustainability targets, once the vital work of deciding the colour of the new authority's logo is complete.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 230/1/4</p> <p>Name: Moulton Parish Council</p>	<p>Refers to: para. 11.5</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not effective</p>	<p>Comments: No mention of Northern Orbital Route. This should be cross-referenced to Appendix C.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The Northern Orbital Route is mentioned in paragraph 11.15 of the LPP2.</p>
<p>Representation reference: 230/1/3</p> <p>Name: Moulton Parish Council</p>	<p>Refers to: para. 11.7</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not effective</p>	<p>Comments: Expansion of Northampton's population to the north and further housing is likely to lead to expansion of through-traffic in Moulton. What mitigation is planned to reduce through traffic in Moulton? (the only reference we can find is obliquely via points 11.7 and 11.8). Specifically, where Northampton's plans impact areas outside Northampton Borough (as in this case) a clear commitment should be made to addressing any consequential impact. Please also note other comments made elsewhere about Northern Orbital Route; NOR is unlikely alone to be sufficient to prevent Moulton being used as a rat run for through traffic.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 32 of the LPP2 requires developers to fund and financially contribute towards a range of transport schemes. Policy 37 of the LPP2 also requires major development to contribute towards the delivery of and where necessary provide land / suitable sites for any new infrastructure.</p>

					A list of transport schemes can be found in the Infrastructure Delivery Plan 2019 and at Appendices C - H of the LPP2.
Representation reference: 241/1/8 Name: British Horse Society	Refers to: para. 11.7	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Walking and cycling routes - this excludes equestrians. Most walking and cycling activity is for leisure, as is equestrian activity. Provision should be made for all modes of Active Travel and no barriers should be created to prevent public routes being enjoyed by as many user groups as possible. The creation of shared cycle / pedestrian or cycle paths on the carriageway or adjacent to the carriageway creates additional danger for equestrians. They are left sandwiched between fast moving traffic on their outside and then additional fast-moving cycle traffic on their inside – sometimes that cycle traffic is two directional. The lack of links between settlements and parishes is highlighted in the RoWIP for Northamptonshire. Northamptonshire committed to involve user groups to identify improvements to routes, create new routes where necessary and prioritise Definitive Map anomalies to join up the network.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 248/1/9 Name: Welland Valley Rail	Refers to: para. 11.8	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective	Comments: 11.8 commitment to modal shift target is extremely welcome.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 241/1/9	Refers to: para. 11.12	Legal compliance and soundness:	Comments: Walking and cycling is included in the design of transport schemes -equestrians are excluded.To reiterate, horse riders	Suggested changes: None.	Officer comments: Noted.

<p>Name: British Horse Society</p>		<p>Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>have access to only 22% of the public rights of way network and carriage drivers to just 5%. Invariably equestrians have to use the road network to access their nearest bridleway or byway and it is important that they are able to do this safely and are provided with safe routes just as walkers and cyclists are. Including equestrians provides even better value for the public purse. The creation of shared cycle / pedestrian or cycle paths on the carriageway or adjacent to the carriageway creates additional danger for equestrians. They are left sandwiched between fast moving traffic on their outside and then additional fast-moving cycle traffic on their inside – sometimes that cycle traffic is two directional.</p>		
<p>Representation reference: 62/1/7</p> <p>Name: Northamptonshire County Council / North Northants JPU</p>	<p>Refers to: Policy 32</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: We are very supportive of policies that create a shift towards more sustainable and active forms of travel. The benefits to the community / population of higher levels of active / sustainable travel are many and well documented, including less congestion, better health and wellbeing, reduced pollution and economic benefits of improved access to businesses / shops. Despite many years of policy objectives of achieving a modal shift to active travel, progress has been limited. This is even more pertinent now given the massive health and wellbeing challenges we face and the importance of being active in addressing those.</p> <p>A shift towards more sustainable travel patterns is likely to be crucial for the success of the town and Borough of Northampton in the future. This is particularly the case given the substantial amount of housing growth likely to take place in Northampton in the coming years and the likely increase in car traffic that this will bring. There are a number of reasons why we think this policy is so important:</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 65/1/6</p>	<p>Refers to: Policy 32</p>	<p>Legal compliance and soundness:</p>	<p>Comments:</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments:</p>

<p>Name: English Regional Transport Association</p>		<p>Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened.</p> <p>Northampton North –West and Northern Relief Roads - These will both shift traffic rather than removing it and the new road space will soon fill up with traffic. Furthermore it will also obliterate the track-bed of the old Northampton-Market Harborough railway line which the ERTA also wishes to see re-opened.</p> <p>St.James Inner Relief Road - This is a short-term project (apparently currently put on hold due to funds)and again, this will shift traffic rather than removing it and at best, given there is a considerable amount of commercial and domestic development in Northampton Borough, the new road space will soon fill up with traffic. It will also obliterate the old track-bed of the old Northampton - Bedford railway. There must be provision for a potential level crossing where the road crosses the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).</p>		<p>The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p>Representation reference: 113/1/14</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 32</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic,</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to</p>

			and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.		accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.
<p>Representation reference: 113/1/16</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 32</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be</p>

					required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.
<p>Representation reference: 113/1/18</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 32</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety The cumulative impact of the development proposed in East Hunsbury on traffic density and air pollution will be significant, particularly as two Air Quality Management Areas abut the parish boundary. The Local Plan should address facilities for walking, cycling and public transport and creating a joined-up approach across Northampton, rather than concentrating efforts on new developments. A reduction in car use will only be achievable with access to reliable public transport services (including the rail network), with additional services and good connections. Linking existing cycle routes with clear, safe, and well-maintained cycle paths to create a proper network is essential.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 32 of the LPP2 requires developments to fund and financially contribute towards a range of transport schemes and to demonstrate that they can mitigate the proposal's transport impact either on or off-site. The policy requires developments to achieve sustainable transport principles including promoting modal shift away from and reduction of car usage. Policy 35 of the LPP2 requires new development to provide facilities for</p>

					electric vehicle charging points. Both policies are expected to improve air quality. No modification required.
<p>Representation reference: 197/1/6</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 32</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments:</p> <p>3. The County Council supports inclusion within the Draft Plan Policy 32 to design and support sustainable transport and travel, and in particular the requirement for development to be designed to incorporate, demonstrate and achieve provision of electric vehicle re-charging points. Inclusion of this as a policy will help to encourage modal shift away from standard modes of transport towards more sustainable methods and meet the rising demand for such provision as demonstrated through significant increase in sales of electric plug-in and low emission vehicles across the UK.</p> <p>4. In addition to highway improvements, provision may also be sought towards facilities enabling improved traffic and travel information in the Borough, sometimes as part of a travel plan, to help mitigate the impact of development. Even in areas where the car is the primary mode of travel, live information can help to promote the availability of alternative travel modes and reduce congestion by providing helpful journey information.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 200/1/43</p> <p>Name: HBF</p>	<p>Refers to: Policy 32</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared</p>	<p>Comments: Under Policy 32 developments should be designed to provide electric vehicle re-charging points (EVCPs) in line with Policy 35.</p>	<p>Suggested changes: Under Policy 32 developments should be designed to provide electric vehicle re-charging points (EVCPs) in line with Policy 35.</p>	<p>Officer comments: Modify the plan by remove reference to Policy 34 from Policy 32.</p>

		<ul style="list-style-type: none"> - not justified - not effective - not consistent with national policy 			
<p>Representation reference: 234/1/5</p> <p>Name: Diversified Property Fund For Charities</p>	<p>Refers to: Policy 32</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy </p>	<p>Comments: Whilst it is not believed that this is their intention, the implication of these policies, as presently worded, is that a proposal for the change of use of a unit in excess of 1,000sqm would require the submission of a Sustainability Statement, Health Impact Assessment and Travel Plan. Applied to Grafton Trade Park, this could mean that a straightforward change of use application for one of the larger units (for example, to allow another car rental operator within the Trade Park) would trigger the need for such burdensome documents. Such requirements would appear to be inappropriate and disproportionate for such modest changes of use and ought to be removed.</p>	<p>Suggested changes: DPFC therefore suggest that these policies are amended to clarify that they apply solely to proposals for new build floorspace over 1,000sqm and not to changes of use of existing floorspace.</p>	<p>Officer comments: It is important that these requirements apply to all developments because they all have impacts on sustainability, health and transport related matters. No modification required.</p>
<p>Representation reference: 244/1/26</p> <p>Name: Bastion Group</p>	<p>Refers to: Policy 32</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: This is considered to be an important policy in terms of securing necessary sustainable travel principles within developments and Bastion support the majority of components within the policy. The reference to the need to upgrade and improve the existing street scene is however, considered ambiguous and lacks clarity in terms of what it actually requires. It also risks not being consistent with national policy and is not effective as it is unlikely that all schemes would be able to demonstrate that such a requirement is compliant with Regulation 122 of Community Infrastructure Regulations (2019, as amended), the NPPF and the PPG Paragraph: 002 Reference ID: 23b-002-20190901 in terms of being:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and 	<p>Suggested changes: It is therefore recommended that this component of the policy is deleted and the wider policy is reviewed in this same context.</p>	<p>Officer comments: It is expected that the street scene is considered and incorporated into sustainable transport and travel schemes as it is a key component. Individual schemes will need to be discussed with the Council as part of the development management process.</p>

			<ul style="list-style-type: none"> fairly and reasonably related in scale and kind to the development. 		
<p>Representation reference: 251/1/24</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 32</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: Under Policy 32 developments should be designed to provide electric vehicle re-charging points (EVCPs) in line with Policy 35.</p>	<p>Suggested changes: Under Policy 32 developments should be designed to provide electric vehicle re-charging points (EVCPs) in line with Policy 35.</p>	<p>Officer comments: Modify the Policy and remove reference to Policy 34 from Policy 32.</p>
<p>Representation reference: 113/1/15</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 33</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety The proposed remodelling of the Rowtree Road approach to the A45 will do little to mitigate the impact of increased traffic, and there is no consideration for the congestion that occurs in East Hunsbury due to issues on the A45 or the M1.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the</p>

					need for localised improvement works, particularly around access to sites. No modification required.
<p>Representation reference: 113/1/17</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 33</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety We do not consider the identified highway infrastructure improvements robust enough to accommodate the cumulative scale of growth proposed. The opportunity should be taken to review traffic impact on Northampton as a whole, including the proposal for a Northern Orbital road which will serve other SUEs and reduce pressure on the A45.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The LPP2 has undergone traffic modelling and analysis. It has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth. This is outlined in Appendix C. Transport Assessments or Statements will be required for development proposals and these may indicate the need for localised improvement works, particularly around access to sites. No modification required.</p>

<p>Representation reference: 113/1/19</p> <p>Name: East Hunsbury Parish Council</p>	<p>Refers to: Policy 33</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: We do not believe the plan to be positively prepared or effective on the issue of Traffic and Pollution, specifically in relation to the following policies: Policy 32 – Designing sustainable transport and travel Policy 33 – Highway network and safety The cumulative impact of the development proposed in East Hunsbury on traffic density and air pollution will be significant, particularly as two Air Quality Management Areas abut the parish boundary. The Local Plan should address facilities for walking, cycling and public transport and creating a joined-up approach across Northampton, rather than concentrating efforts on new developments. A reduction in car use will only be achievable with access to reliable public transport services (including the rail network), with additional services and good connections. Linking existing cycle routes with clear, safe, and well-maintained cycle paths to create a proper network is essential.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 32 of the LPP2 requires developments to fund and financially contribute towards a range of transport schemes and to demonstrate that they can mitigate the proposal's transport impact either on or off-site. The policy requires developments to achieve sustainable transport principles including promoting modal shift away from and reduction of car usage. Policy 35 of the LPP2 requires new development to provide facilities for electric vehicle charging points. Both policies are expected to improve air quality. No modification required.</p>
<p>Representation reference: 65/1/3</p> <p>Name:</p>	<p>Refers to: para. 11.15</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p>	<p>Comments: Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for</p>	<p>Suggested changes: None specified</p>	<p>Officer comments: The route of the former Northampton to</p>

English Regional Transport Association		<p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	<p>railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened.</p> <p>Northampton North –West and Northern Relief Roads - These will both shift traffic rather than removing it and the new road space will soon fill up with traffic. Furthermore it will also obliterate the track-bed of the old Northampton-Market Harborough railway line which the ERTA also wishes to see re-opened.</p> <p>St.James Inner Relief Road - This is a short-term project (apparently currently put on hold due to funds)and again, this will shift traffic rather than removing it and at best, given there is a considerable amount of commercial and domestic development in Northampton Borough, the new road space will soon fill up with traffic. It will also obliterate the old track-bed of the old Northampton - Bedford railway. There must be provision for a potential level crossing where the road crosses the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).</p>		Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.
<p>Representation reference: 230/1/5</p> <p>Name: Moulton Parish Council</p>	<p>Refers to: para. 11.15</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not effective 	<p>Comments: Safeguarding route of former Northampton to Market Harborough railway as a potential transport corridor implies loss/degradation of Brampton Valley way foot/cycle path. Surely, for wellbeing, a commitment should be made to no loss of habitat or environment on this route?</p>	<p>Suggested changes: None.</p>	<p>Officer comments: It is accepted that the route is identified as an important green infrastructure corridor and this is referenced in the Green Infrastructure (GI) Study 2016. The GI study includes this corridor within</p>

					its Brampton Arm of River Nene component, from which several GI projects have been identified to support the corridor. Any proposal that comes forward on the former Northampton to Market Harborough railway line will need to take the GI study into account, as outlined in Policy 27 Sustaining and enhancing existing, and supporting the creation of, Northampton's green infrastructure.
Representation reference: 230/1/6 Name: Moulton Parish Council	Refers to: para. 11.15	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not effective	Comments: mention of Northern Orbital Route, but this is not referenced in Appendix C.	Suggested changes: None.	Officer comments: The Northern Orbital Route is not referenced in Appendix C as there is no approved scheme yet.
Representation reference: 248/1/4 Name:	Refers to: para. 11.15	Legal compliance and soundness: Legal compliance: - not specified	Comments: It is extremely welcome to see a council considering new rail destinations, so often councils limit themselves to meekly asking for a couple of extra services on existing routes, so to	Suggested changes: None.	Officer comments: Noted.

Welland Valley Rail		Plan is unsound: - not effective	see new destinations being both considered and route for them protected is extremely welcome.		
Representation reference: 248/1/10 Name: Welland Valley Rail	Refers to: para. 11.15	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective	Comments: 11.15 The council then lets itself down by casually presuming that a number of major road projects WILL take place, which clearly run completely counter to pollution, modal shift and decarbonisation targets, and gives the impression that the council will not be holding all development to the same sustainability scrutiny. E.g. "will" "the dualling of the A43 from Northampton to Kettering"	Suggested changes: Suggest changing language in 11.15 from "will" to "may" and adding "all planned and potential transport projects will be reviewed against current sustainable transport & travel policy". Clearly if a road is busy enough to consider dualing, and there is not currently a corresponding rail link along that route - it is a prime candidate for provision of a sustainable rail link. Whilst this particular road project may not fall within the council's current geographical boundary, it is still in a good position to influence it,	Officer comments: The dualling of the A43 from Northampton to Kettering is a Northamptonshire County Council scheme which is currently in their Local Transport Plan to come forward within and beyond the Local Plan period. No modification required.

				which will be further increased when the new unitary authority comes into effect.	
<p>Representation reference: 65/1/4</p> <p>Name: English Regional Transport Association</p>	<p>Refers to: para. 11.16</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both shift traffic rather than removing it and the new road space will soon fill up with traffic. Furthermore it will also obliterate the track-bed of the old Northampton-Market Harborough railway line which the ERTA also wishes to see re-opened. St.James Inner Relief Road - This is a short-term project (apparently currently put on hold due to funds)and again, this will shift traffic rather than removing it and at best, given there is a considerable amount of commercial and domestic development in Northampton Borough, the new road space will soon fill up with traffic. It will also obliterate the old track-bed of the old Northampton - Bedford railway. There must be provision for a potential level crossing where the road crosses the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p>Representation reference: 65/1/5</p>	<p>Refers to: para. 11.17</p>	<p>Legal compliance and soundness: Legal compliance:</p>	<p>Comments: Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The route of the former</p>

<p>Name: English Regional Transport Association</p>		<p>- not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened.</p> <p>Northampton North –West and Northern Relief Roads - These will both shift traffic rather than removing it and the new road space will soon fill up with traffic. Furthermore it will also obliterate the track-bed of the old Northampton-Market Harborough railway line which the ERTA also wishes to see re-opened.</p> <p>St.James Inner Relief Road - This is a short-term project (apparently currently put on hold due to funds)and again, this will shift traffic rather than removing it and at best, given there is a considerable amount of commercial and domestic development in Northampton Borough, the new road space will soon fill up with traffic. It will also obliterate the old track-bed of the old Northampton - Bedford railway. There must be provision for a potential level crossing where the road crosses the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).</p>		<p>Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p>Representation reference: 248/1/11</p> <p>Name: Welland Valley Rail</p>	<p>Refers to: para. 11.17</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not effective</p>	<p>Comments: 11.17 It is also extremely welcome to see the Brackmills corridor being protected for transport use, however despite being mentioned in the text it does not appear on the maps, so we would like to see it defined on the map to avoid ambiguity over it's definition. We would expect that "Brackmills" would include both former routes which went onto Bedford and Wellingborough.</p>	<p>Suggested changes: Include Brackmills corridor between Northampton Station and Brackmills on the policies map.</p>	<p>Officer comments: This was omitted in error. This is being recommended for inclusion in Policy 34 and the Policies Map as part of the minor modifications.</p>

<p>Representation reference: 248/1/12</p> <p>Name: Welland Valley Rail</p>	<p>Refers to: para. 11.17 and policies map</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not effective</p>	<p>Comments: 11.17 It is also extremely welcome to see the Brackmills corridor being protected for transport use, however despite being mentioned in the text it does not appear on the maps, so we would like to see it defined on the map to avoid ambiguity over it's definition. We would expect that "Brackmills" would include both former routes which went onto Bedford and Wellingborough.</p>	<p>Suggested changes: Include Brackmills corridor between Northampton Station and Brackmills on the policies map.</p>	<p>Officer comments: This was omitted in error. This is being recommended for inclusion in Policy 34 and the Policies Map as part of the minor modifications.</p>
<p>Representation reference: 65/1/7</p> <p>Name: English Regional Transport Association</p>	<p>Refers to: Policy 34</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both shift traffic rather than removing it and the new road space will soon fill up with traffic. Furthermore it will also obliterate the track-bed of the old Northampton-Market Harborough railway line which the ERTA also wishes to see re-opened. St.James Inner Relief Road - This is a short-term project (apparently currently put on hold due to funds)and again, this will shift traffic rather than removing it and at best, given there is a considerable amount of commercial and domestic development in Northampton Borough, the new road space will soon fill up with traffic. It will also obliterate the old track-bed of the old Northampton - Bedford railway. There must be provision for a potential level crossing where the road crosses</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>

			the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).		
Representation reference: 75/1/12 Name: Town Centre Conservation Area Advisory Committee	Refers to: Policy 34	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective - not consistent with national policy	Comments: It is not enough to minimise pollution issues, developments must not create or exacerbate pollution issues and should ideally reduce existing pollution issues. This is clearly important for health, but it is also a heritage issue within the remit of the TCCAAC because pollution can have a catastrophic effect on historic buildings (e.g. destroying carved stonework).	Suggested changes: In the second paragraph of this policy, replace “provide opportunities to minimise and where possible reduce pollution issues” to “demonstrate that they will not create or exacerbate pollution issues and if possible will reduce pollution issues”.	Officer comments: Policy 34 of the LPP2 relates to transport schemes and requires proposals for future transport schemes to state how they will contribute to lowering emissions and contribute to the aim of achieving net-zero emissions by 2030. This is in line with Northampton's declaration of a Climate Emergency in 2019. Along with other policies within the plan, it is expected to assist Northampton in reducing pollution and adapting to climate change by the end of the plan period. No modification required.
Representation reference: 197/1/7	Refers to: Policy 34	Legal compliance and soundness:	Comments:	Suggested changes:	Officer comments:

<p>Name: Northamptonshire County Council</p>		<p>Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Policy 34, which includes the safeguarding of the former Northampton – Market Harborough railway line for future transport use is supported by the County Council. It is suggested however that in addition to this, a new Policy be included within the Draft Plan which acknowledges the importance of the former Northampton – Bedford railway line, and which seeks to safeguard this as a potential future transport route, catering for existing and future workforce travel whilst also providing additional capacity and travel choices to meet the needs of the growth of Northampton and surrounding areas.</p>	<p>Policy 34, which includes the safeguarding of the former Northampton – Market Harborough railway line for future transport use is supported by the County Council. It is suggested however that in addition to this, a new Policy be included within the Draft Plan which acknowledges the importance of the former Northampton – Bedford railway line, and which seeks to safeguard this as a potential future transport route, catering for existing and future workforce travel whilst also providing additional capacity and travel choices to meet the needs of the growth of Northampton and surrounding areas.</p>	<p>This is an omission. Modify the Plan to include reference to the railway line in Policy 34.</p>
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<p>Representation reference: 227/1/1</p> <p>Name: Harborough District Council</p>	<p>Refers to: Policy 34</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments: The plan is not strategic and therefore has limited impact on Harborough District. However, HDC note the inclusion of Policy 34 – ‘Transport Schemes and Mitigation’ which safeguards the route of the former Northampton to Market Harborough railway line for future transport use. In line with comments made to the West Northamptonshire Strategic Plan Issues consultation, the North-South rail is an interesting proposition and is worthy of further consideration. We would like to be included in any future discussions regarding this project.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 248/1/13</p> <p>Name: Welland Valley Rail</p>	<p>Refers to: Policy 34</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not effective</p>	<p>Comments: Policy 34 - in line with 11.17, it would be preferable to see the Brackmills-Castle station corridor given the same degree of definition and protection as the Market Harborough corridor.</p>	<p>Suggested changes: Policy 34 - in line with 11.17, it would be preferable to see the Brackmills-Castle station corridor given the same degree of definition and protection as the Market Harborough corridor.</p>	<p>Officer comments: This was omitted in error. This is being recommended for inclusion in Policy 34 and the Policies Map as part of the minor modifications.</p>
<p>Representation reference: 97/1/18</p> <p>Name: Clayson Country Homes</p>	<p>Refers to: Policy 35</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: It is considered that Policy 35 and its reference to the Parking Standards SPD is the appropriate approach to dealing with standards in new development and allows for future revisions to the corresponding SPD. However, the implications for housing delivery as a result of changing standards should be seriously considered and understood before any updated SPD is adopted. The most recent iteration of the NCC Parking Standards sought an increased level of parking from residential developments, over and above that which was planned for at the time when the JCS was adopted. The result of an increased</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Northampton Borough Council has adopted its own Parking Standards SPD. No modification required.</p>

			land take for parking spaces is less land for residential development and it is urged that through any future consideration of parking standards that this relationship be fully explored and understood.		
Representation reference: 195/1/17 Name: Mr B Cheer	Refers to: Policy 35	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: It is considered that Policy 35 and its reference to the Parking Standards SPD is the appropriate approach to dealing with standards in new development and allows for future revisions to the corresponding SPD. However, the implications for housing delivery as a result of changing standards should be seriously considered and understood before any updated SPD is adopted. The most recent iteration of the NCC Parking Standards sought an increased level of parking from residential developments, over and above that which was planned for at the time when the JCS was adopted. The result of an increased land take for parking spaces is less land for residential development and it is urged that through any future consideration of parking standards that this relationship be fully explored and understood.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 200/1/44 Name: HBF	Refers to: Policy 35	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Under Policy 35 new development must meet adopted parking standards and accord with the principles set out in the Parking Standards Supplementary Planning Document (SPD) including the provision of facilities for EVCPs. The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. Recently, the Department of Transport held a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019).	Suggested changes: None.	Officer comments: Noted.

			<p>This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in 2020. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M. The Government has estimated installation of such charging points add on an additional cost of approximately £976.</p>		
<p>Representation reference: 200/1/45</p> <p>Name: HBF</p>	<p>Refers to: Policy 35</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's recent consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement,</p>	<p>Suggested changes: The requirement for EVCPs should be deleted because of the Government's proposed changes to Building Regulations.</p>	<p>Officer comments: The requirements for EVCPs are required to ensure that the Council continues to address climate change. The Government's guidance has not yet been finalised.</p>

			<p>which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades, which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.</p> <p>The Council's viability evidence set out in Plan Viability Study by Aspinall Verdi dated June 2020 includes a cost allowance of £1,000 per space but the sufficiency of this allowance cannot be assessed because of the vagueness of the Council's policy wording.</p>		
<p>Representation reference: 200/1/46</p> <p>Name: HBF</p>	<p>Refers to: Policy 35</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective</p>	<p>Comments: Furthermore, the Regulations are clear that development management policies, which are intended to guide the determination of applications for planning permission should be set out in the Local Plan. The Council should not devolve fundamental policy matters to its Parking Standards SPD. Where SPDs are prepared, they should be used to provide more detailed advice and guidance on the policies in the LPP2 and not as an opportunity to change or introduce the requirements of a policy. As defined in 2019 NPPF Glossary, an SPD is capable of being a material consideration in planning</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Policy 35 sets out that new development must meet adopted parking standards. In the case of Northampton Borough, these are the Northamptonshire</p>

		- not consistent with national policy	decisions but is not part of the Local Plan. The Regulations indicate that an SPD does not have statutory force. An SPD is defined as something that is not a Local Plan as it has not been subject to the same process of preparation, consultation and examination. The Council should not convey Local Plan status onto its Parking Standards SPD.		County Council adopted parking standards. The Northampton Parking Standards SPD provides further principles and guidance for parking. No modification required.
<p>Representation reference: 229/1/28</p> <p>Name: Barratt David Wilson Homes</p>	<p>Refers to: Policy 35</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The provision of electric vehicle charging points will need to be secured at Outline or Full Application stage through way of Condition. The ability to provide rapid charging points is dependent on the capacity of the electric substation that serves the Development and the ability of the electric infrastructure network.</p> <p>Issues have occurred in the wider Northamptonshire area, where Authorities have imposed a car charging scheme condition on Reserved Matters Applications, expecting an electric vehicle car charging scheme to be a form of rapid car charging. This might not be possible if there is no capacity for rapid car charging at the electric substation that serves the site. This happens more often where electricity supply to the site is reliant on an existing substation.</p> <p>The policy does not expand on what is required in terms of Car Parking Management Strategy.</p> <p>The policy by not acknowledging these the technical issues or expanding on what a car parking management strategy would entail, is therefore not effective.</p>	<p>Suggested changes: Modification: New developments must meet adopted parking standards and accord with the principles set out in the Parking Standards SPD. Applicants are required to demonstrate that electric vehicle charging is a rapid form of car charging, unless the infrastructure capabilities indicate otherwise.</p> <p>Transport schemes and major new Developments should also provide a Car Parking</p>	<p>Officer comments: Policy 35 requires provision of electric vehicle charging points and does not mention rapid charging. Applicants will need to meet requirements set out in the relevant parking SPD and liaise with the Highways Authority as a part of their application process. No modification required.</p>

				Management Strategy. The strategy will need to address the following issues....”	
<p>Representation reference: 250/1/20</p> <p>Name: St Clair Land and Developments LLP Old Bedford Road</p>	<p>Refers to: Policy 35</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: It is considered that Policy 35 and its reference to the Parking Standards SPD is the appropriate approach to dealing with standards in new development and allows for future revisions to the corresponding SPD. However, the implications for housing delivery as a result of changing standards should be seriously considered and understood before any updated SPD is adopted. The most recent iteration of the NCC Parking Standards sought an increased level of parking from residential developments, over and above that which was planned for at the time when the JCS was adopted. The result of an increased land take for parking spaces is less land for residential development and it is urged that through any future consideration of parking standards that this relationship be fully explored and understood.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 251/1/25</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 35</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Developers disagree with the proposed approach to Policy 35 as set out below. Policy 35 proposes the following requirement: ‘New development must meet adopted parking standards and accord with the principles set out in the Parking Standards SPD including the provision of facilities for electric vehicle charging points.’ The Developers are supportive of the encouragement for the use of electric and hybrid vehicles but consider this should be secured through a national standardised approach implemented through the Building Regulations. This will ensure a consistent approach to future proofing the housing stock. In this regard, the Department of Transport undertook a consultation on Electric Vehicle Charging in Residential and</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: There is a need to ensure that local standards are required to meet the local aspirations and objectives for parking provision as well as climate change. It is considered that one per dwelling is not sufficient to meet the needs of householders. In</p>

			<p>Non-Residential Buildings in July 2019. This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which was expected to come into force in 2020.</p> <p>The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and considered a proposal for one charge point per dwelling rather than per parking space.</p> <p>The Government estimated installation of such charging points add on an additional cost of approximately £976 per car parking space for an average home²³.</p>		<p>addition, the Government's guidance on these issues have not been finalised.</p>
<p>Representation reference: 251/1/26</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 35</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible: 'However, we recognise that the cost of installing chargepoints can be high in areas where significant electrical capacity reinforcements are needed. To mitigate any potential negative impact on housing supply as a result of these regulations, this consultation seeks views on an appropriate exemption from the chargepoint installation requirement based on the grid connection cost. The consultation proposes the threshold for the exemption is set at £3600, which is three times the high scenario cost of the average electrical capacity connection required for one chargepoint.' In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied: 'The EPBD also sets out requirements for residential buildings undergoing major renovation with more than 10 parking</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The policy has been assessed and is considered viable.</p>

			spaces. As a starting point, the government proposes to transpose the EPBD requirements for major renovations - i.e. the installation of cable routes in all parking spaces in scope as we think this is a proportionate requirement. However, the consultation seeks views on the possibility of going further than the EU requirements.’ The requirement for EVCPs should be deleted given the Government’s proposed changes to Building Regulations are still at the consultation stage and therefore have not been finalised.		
<p>Representation reference: 251/1/27</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 35</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: In any event, the wording of draft Policy 35 would fail the tests of soundness as per NPPF Paragraph 16 which states that policies should be ‘clearly written and unambiguous, so it is evident how a decision maker should react to development proposals’. The policy does not define how many EVCPs are required per plot, or whether these are required on a per dwelling or per space basis. Resultingly, the draft policy is unlawful in that it devolves fundamental development management policies, which should be set out through the NLP2, to the Parking Standards SPD. The PPG24 is clear that such an approach is contrary to the role of SPDs: ‘Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.’ [Emphasis added] As currently drafted, Policy 35 risks introducing new planning policies into the development plan, such as the imposition of delivering EVCPs and would thus be unlawful.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The adopted Supplementary Planning Document on Parking provides the necessary details on the implementation of this policy.</p>

			<p>In this respect, the Developers wish to refer the Council to the implications of William Davis v Charnwood Borough Council²⁵, where Gilbart J quashed Charnwood Borough Council's enforced housing mix policy on the basis that it should have been adopted as part of a Development Plan Document ('DPD'), requiring independent examination, instead of an SPD, which only requires consultation.</p> <p>The housing mix policy deferred to an adopted SPD which itself prescribed a specific housing mix expected from new developments, with any departure from the specified percentages requiring justification through evidence. Gilbart J agreed with the group of claimants in that the policy constituted a statement regarding 'the development and use of land which the local planning authority wish to encourage during any specified period', and was a 'development management policy ... intended to guide the determination of applications for planning permission.' Accordingly, by virtue of regulations 2, 5 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the policy needed to be adopted in a DPD rather than an SPD. The housing mix policy was also found to be unlawful due to a failure by the Council to undertake a viability assessment of the policy before the SPD was adopted.</p> <p>In the case of draft Policy 35, the Developers note that the Council's Plan Viability Study (Aspinall Verdi, June 2020) incorporates a build cost assumption £1,000 per charge points per dwelling²⁶. However, given the ambiguity of the policy requirement, the basis and sufficient of this allowance cannot be accurately assessed.</p>		
<p>Representation reference: 197/1/8</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Chapter 12</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness:</p>	<p>Comments: 6. The Draft Plan clearly acknowledges the fundamental role that infrastructure delivery will play in meeting the housing and employment trajectories set out in the WNJCS. The Infrastructure required to serve the current and future needs of the Borough is set out in the Infrastructure Delivery Plan;</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

		- not specified	this should be regularly reviewed to ensure it remains up to date and takes into account emerging priorities and opportunities, and to identify any potential challenges to delivery and put in place solutions to address these.		
Representation reference: 230/1/7 Name: Moulton Parish Council	Refers to: para. 12.9	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not effective	Comments: No mention of healthcare facilities at Northampton North SUE. Bearing in mind the already over-stretched GP surgery in Moulton and the lack of progress by NHS on provision of expanded facilities for existing Moulton residents, what provision is intended for Northampton North SUE? This should be cross-referenced to Appendix F.	Suggested changes: None.	Officer comments: The Policy and requirements for Northampton North SUE are set out in the West Northamptonshire Joint Core Strategy.
Representation reference: 200/1/47 Name: HBF	Refers to: Policy 36	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Policy 36 : Electronic Communication Networks Under Policy 36 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.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 200/1/49 Name: HBF	Refers to: Policy 36	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared	Comments: It is also unclear if the requirements of Policies 36 and 37 have been included in the Council's viability testing.	Suggested changes: These policy requirements are unnecessary and repetitive of Building Regulations, which should be deleted.	Officer comments: Policies 36 and 37 have been considered in the LPP2's Viability Assessment (Appendix 1). No modifications

		<ul style="list-style-type: none"> - not justified - not effective - not consistent with national policy 			required to Policies 36 and 37.
<p>Representation reference: 251/1/28</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 36</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: <ul style="list-style-type: none"> - not justified - not effective - not consistent with national policy </p>	<p>Comments: Policy 36 requires that ‘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.’ The Developers disagree with this proposed approach as set out in the response to Policy 37 below. Policy 37 stipulates that ‘Developers are also required to provide delivery of “full fibre” connectivity to new build development.’</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 197/1/9</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: para. 12.12</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments: 7. The County Council acknowledges the amendments made to section d) Education to reflect the role of the County Council as Local Education Authority with statutory duties in respect of providing sufficiency of school places.</p>	<p>Suggested changes: As a point of clarity, it is suggested that the wording from paragraph 12.12 be further amended as follows:</p> <p>“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</p>	<p>Officer comments: The recommended changes are considered acceptable. Modify para 12.12 as follows:</p> <p>“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</p>

				<p>housing growth allocated through the Local Plan process is expected however to place further pressures 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 funded agreements with the Secretary of State for Education. The majority of new schools delivered in Northampton will be free schools.</p>	<p>growth allocated through the Local Plan process is expected however to place further pressures 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 funded agreements with the Secretary of State for Education. The majority of new schools delivered in Northampton will be free schools.</p> <p>“The funding provision for new</p>
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				<p>“The funding provision for new school places education 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 local Community Infrastructure Levy where school places are required as 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 their development, where it is to be</p>	<p>school places education 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 local Community Infrastructure Levy where school places are required as 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 their development, where it is to be located and the associated cost.”</p>
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				located and the associated cost.”	
Representation reference: 197/1/10 Name: Northamptonshire County Council	Refers to: para. 12.14	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: The County Council welcomes the inclusion of wording relating to the importance of Library infrastructure within the Draft Plan (12.14) and the need for new housing developments to mitigate their impact on its provision through Section 106 developer contributions. This approach is supported by the County Council.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 97/1/19 Name: Clayson Country Homes	Refers to: Policy 37	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In respect of Policy 37, it is considered that the second sentence of the first paragraph could be removed to avoid repetition with the acute content of Policy 36.	Suggested changes: In respect of Policy 37, it is considered that the second sentence of the first paragraph could be removed to avoid repetition with the acute content of Policy 36.	Officer comments: It is agreed that this is a duplication. Modify the plan to remove the second sentence of first paragraph as it duplicates Policy 36.
Representation reference: 195/1/18 Name: Mr B Cheer	Refers to: Policy 37	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In respect of Policy 37, it is considered that the second sentence of the first paragraph could be removed to avoid repetition with the acute content of Policy 36.	Suggested changes: None.	Officer comments: It is agreed that there is duplication. Modify the Plan to remove the second sentence of the first paragraph to Policy 37.
Representation reference: 197/1/11 Name: Northamptonshire County Council	Refers to: Policy 37	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: 9. It is noted that the Draft Plan specifies that major development (schemes of 10 residential units and above, and commercial developments of 1,00sqm and above) will be assessed on the basis of its impact on local infrastructure (Policy 37), and developer obligations may be secured towards	Suggested changes: None.	Officer comments: Policy 37 should be read in conjunction with Policies INF1 and INF2 of the West

			<p>mitigating this where additional capacity is deemed to be required.</p> <p>10. In addition, it should be recognised that small sites (below 10 units / 1,000sqm) may still have a cumulative impact on existing provision and capacity, as does the continued application of permitted development rights to convert commercial premises to residential uses, when considered in conjunction with other development in a locality, and whilst s106 developer contributions would not normally be secured from these schemes there should be a recognition that their impact may still need to be mitigated and provision made through Section 106 agreements.</p>		Northamptonshire Joint Core Strategy.
<p>Representation reference: 197/1/12</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 37</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments:</p> <p>11. It is the recommendation of the County Council that all major residential and commercial developments should also be assessed on the basis of the need for additional Fire & Rescue infrastructure (both on-site and off-site), which for example may require provision of additional fire hydrants, or contributions towards increasing capacity of fire and rescue facilities, services, and infrastructure to ensure that new development can be adequately served in the event of a fire.</p> <p>12. New developments and associated infrastructure within Northampton borough equates to an increase in visitors as well as traffic movements. This will inevitably lead to an increase in the spread of fire risk, which places additional demands on Fire and Rescue Service resources to ensure safe places are maintained, consistent with national Government expectations and guidance.</p> <p>13. Northamptonshire Fire and Rescue Service sets out its criteria for responding to incidents within its Standards of Operational Response (SOR). The standards outline how the Service will respond to different incident types which fall within</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			its statutory responsibilities under the Fire and Rescue Services Act 2004.		
Representation reference: 197/1/13 Name: Northamptonshire County Council	Refers to: Policy 37	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: Development coming forward during the Draft Plan period should be assessed to ensure that sufficient infrastructure is in place to accommodate the increased demand for services. This may result in a requirement for developer contributions to be secured, or for appropriate planning conditions to be applied to permissions granted, to ensure that adequate infrastructure is in place to enable fire, should it occur, to be effectively tackled.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 197/1/14 Name: Northamptonshire County Council	Refers to: Policy 37	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: The County Council supports the inclusion within Policy 37 of the need for land / suitable sites to be provided by development where necessary, in addition to financial contributions through developer obligations. The requirement for development to provide 'full fibre' connectivity to new build premises is also welcomed.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 197/1/16 Name: Northamptonshire County Council	Refers to: Policy 37	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: 18. The Draft Plan is underpinned by the West Northamptonshire Infrastructure Delivery Plan, which identifies the strategic infrastructure requirements necessary to support planned growth. It will be necessary to review this regularly with partners to ensure that the most up to date information is available to inform development, and to take into account any changes to proposed implementation schedules, which may result in bringing forward or pushing back delivery of key schemes to meet demand.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 197/1/25	Refers to: Policy 37	Legal compliance and soundness: Legal compliance: - not specified	Comments: 22. Continued engagement is welcomed with Northampton Borough Council, particularly as the Draft Plan is progressed and as the County Council's adopted Planning Obligations	Suggested changes: None.	Officer comments: Noted.

Name: Northamptonshire County Council		Soundness: - not specified	<p>Framework and Guidance (2015) document is updated. This will ensure that current priorities and policies of the County Council and NBC are aligned in relation to the planning and delivery of new education infrastructure and the ability to secure appropriate developer contributions through Section 106 to effectively mitigate the impact of development across different types of infrastructure.</p>		
Representation reference: 200/1/48 Name: HBF	Refers to: Policy 37	Legal compliance and soundness: <p>Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	Comments: <p>Policy 37 : Infrastructure Delivery & Contributions Under Policy 37 developers are required to provide delivery of “full fibre” connectivity to new build development. The Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the Budget (11th March 2020), the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government will amend Part R “Physical Infrastructure for High Speed Electronic Communications Networks” of the Building Regulations 2010 to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. By taking these steps, the Government intends to overcome any existing market failure. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy. The policy will apply to all to new builds. Any type of technology may be used, which is able to provide speeds of over 1000 Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator. The new measures will place responsibilities on both developers and network operators :-</p> <ul style="list-style-type: none"> • Developers will have to ensure new homes have gigabit broadband. This includes ensuring that the 	Suggested changes: None specified.	Officer comments: Paragraph 112 of the NPPF requires policies to support the expansion of electronic communications networks, including full fibre broadband connections. No modification required.

			<p>physical infrastructure necessary for gigabit- capable connections is provided on site for all new build developments and homes are connected by an operator to a gigabit-capable connection ;</p> <ul style="list-style-type: none"> • This requirement exists unless the cost to the developer of providing connectivity exceeds £2,000, or the operator declines to provide a connection ; • Developers must seek a second quote from network operators, where the first quote suggests that gigabit-capable broadband cannot be installed within the cost cap ; • If gigabit broadband exceeds the cost cap, the developer must provide connectivity to other technologies, which can provide at least superfast connection within the same cost cap, unless the operator declines to provide a connection ; and • A commitment to contribute to the costs of connection by network operators. Virgin Media has committed to contributing at least £500, rising in the case of some larger sites to £1,000. Openreach has committed to a combined Openreach and Developer Contribution of • £3,400, with a maximum developer contribution of £2,000. • As soon as Parliamentary time allows, the Government intends to lay the legislation to amend the Building Regulations. The supporting statutory guidance (Approved Documents) will also be published as soon as possible. 		
<p>Representation reference: 200/1/50</p> <p>Name: HBF</p>	<p>Refers to: Policy 37</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p>Comments: It is also unclear if the requirements of Policies 36 and 37 have been included in the Council's viability testing.</p>	<p>Suggested changes: These policy requirements are unnecessary and repetitive of Building</p>	<p>Officer comments: Policies 36 and 37 have been considered in the LPP2's Viability Assessment</p>

		<ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 		Regulations, which should be deleted.	(Appendix 1). No modifications required to Policies 36 and 37.
<p>Representation reference: 229/1/29</p> <p>Name: Barratt David Wilson Homes</p>	Refers to: Policy 37	<p>Legal compliance and soundness: Plan is not legally compliant:</p> <ul style="list-style-type: none"> - not compliant with duty to cooperate <p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	<p>Comments: This relates to the comments made with regard to policy 35 with regard to electric infrastructure provision and the ability to consider the timely manner in which to impose requirements or obligations on any Consent.</p>	<p>Suggested changes: Modification: Clarification is required in terms of the imposition of requirements or obligations.</p>	<p>Officer comments: S106 obligations agreements are dealt with at the planing application stage. Policy 35 requires provision of electric vehicle charging points and does not mention rapid charging. Applicants will need to meet requirements set out in the relevant parking SPD and liaise with the Highways Authority as a part of their application process. No modification required.</p>
<p>Representation reference: 250/1/21</p> <p>Name:</p>	Refers to: Policy 37	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In respect of Policy 37, it is considered that the second sentence of the first paragraph could be removed to avoid repetition with the acute content of Policy 36.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: It is agreed that this is a repetition. Modify the plan to remove the second</p>

St Clair Land and Developments LLP Old Bedford Road					sentence to Policy 37.
<p>Representation reference: 251/1/29</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 37</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: Policy 37 stipulates that ‘Developers are also required to provide delivery of “full fibre” connectivity to new build development. The Developers consider the Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in the statutory Building Regulations. In the Budget 2020 the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband²⁸. The Department for Digital, Culture, Media and Sport subsequently outlined its intentions on the practical workings of this legislation through ‘Press Release: New-build homes to come gigabit-speed ready’²⁹: ‘The government will amend building regulations to guarantee that all new homes have the right infrastructure to support gigabit broadband and housing developers must work with network operators to install internet speeds of over 1,000 megabits per second (Mbps) in new- build homes, up to a cost cap of £2,000 per dwelling.’ The Press Release confirmed the requirement will apply to all to new builds development, and that the new measures will place responsibilities on both developers and network operators:</p> <ul style="list-style-type: none"> • Developers will have to ensure new homes have gigabit broadband. This includes ensuring that the physical infrastructure necessary for gigabit-capable connections is provided on site for all new build developments and homes are connected by an operator to a gigabit-capable connection; 	<p>Suggested changes: None specified.</p>	<p>Officer comments: Paragraph 112 of the NPPF requires policies to support the expansion of electronic communications networks, including full fibre broadband connections. No change. Policy 37 has been considered in the LPP2’s Viability Assessment (Appendix 1). No change to Policy 37.</p>

			<ul style="list-style-type: none"> • This requirement on the developer to provide a gigabit-capable connection exists unless the cost to the developer of providing connectivity exceeds £2,000, or the operator declines to provide a connection; • Developers must seek a second quote from network operators, where the first quote suggests that gigabit-capable broadband cannot be installed within the cost cap; • If gigabit broadband exceeds the cost cap, the developer must provide connectivity to other technologies, which can provide at least superfast connection within the same cost cap, unless the operator declines to provide a connection; and • A commitment to contribute to the costs of connection by network operators. Virgin Media has committed to contributing at least £500, rising in the case of some larger sites to £1,000. Openreach has committed to a combined Openreach and Developer Contribution of • £3,400, with a maximum developer contribution of £2,000. <p>It also confirms that the legislation is to be laid as soon as parliamentary time allows and will be laid as secondary legislation so that it can be introduced quicker. As a result, the proposed requirements of draft Policies 36 and 37 are unnecessary and repetitive of Building Regulations and should therefore be deleted.</p> <p>Notwithstanding, the requirements of Policies 36 and 37 have not been included in the Council's Plan Viability Study (Aspinall Verdi, June 2020) and therefore it has not been demonstrated whether the policy requirements are viable.</p>		
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Representation reference: 148/1/19 Name: St Clair Land and Developments LLP	Refers to: Chapter 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Turning to the site-specific allocations and policies which are addressed within Chapter 13, the respondent would first like to commend the bold approach which the Council have sought to adopt in clearly defining the significant number of development sites available within the Borough for all development typologies. It is considered that this approach provides landowners, including those with a legal interest, absolute clarity on the potential future options for the development of their land and property interests.	Suggested changes: None.	Officer comments: Welcomed.
Representation reference: 250/1/22 Name: St Clair Land and Developments LLP Old Bedford Road	Refers to: Chapter 13	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Turning to the site-specific allocations and policies which are addressed within Chapter 13, the respondent would first like to commend the bold approach which the Council have sought to adopt in clearly defining the significant number of development sites available within the Borough. It is considered that this approach provides landowners, including those with a legal interest, absolute clarity on the potential future options for the development of their land and property interests.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 23/1/4 Name: University of Northampton	Refers to: Policy 38	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: The University fully supports allocation of Park and Avenue Campuses for residential redevelopment (allocations 1013 & 1014 respectively) under emerging Policies 13 and 38. The University has now relocated to its new Waterside Campus. The University agrees that residential is the most appropriate and viable future use for the sites. Indeed, Park Campus has outline permission for the development of up to 800 homes and the initial phase is under construction. An application for residential development of Avenue Campus is with the Council for consideration.	Suggested changes: None.	Officer comments: Noted.

<p>Representation reference: 30/1/9</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness:</p> <p>Plan is not legally compliant:</p> <ul style="list-style-type: none"> - not in accordance with SCI <p>Plan is unsound:</p> <ul style="list-style-type: none"> - not justified - not consistent with national policy 	<p>Comments:</p> <p>I note that Site 0657 (Fraser Road) is in the list of proposed allocations. In the 2017 Sites Consultation Paper, this site was indicated as ‘not being taken forward for further investigation’. It then appeared as a residential allocation on the policies map for the previous local plan draft submission version consultation. I have no record of either a public or direct consultation from the council regarding changes to the site assessments. For many sites this would not be an issue but in this case the assessment for site LAA0657 states that the site ‘is not in proximity to any designated biodiversity or geodiversity site’. In fact the site is adjacent to Talavera East Potential Wildlife Site and within 1km of other local PWS, and Billing Arbours Local Wildlife Site. These could face increased visitor pressure – and its associated ecological impacts – as a result of residential development. While this might not have rendered site LAA0657 inappropriate for development it does suggest that other sites might have been incorrectly represented in the changes to the site assessments.</p>	<p>Suggested changes: None.</p>	<p>Officer comments:</p> <p>In July 2019, the Government introduced a new set of guidelines in terms of what constitutes a “deliverable” housing site for the purposes of plan making. This meant that the Council was required to review its development plan allocations prior to submitting it to the Planning Inspectorate. The updates were also used to inform the preparation of the Five Year Housing Land Supply for 2018/19. Policy 29 of the LPP2 recognises other biodiversity assets and has been strengthened to include reference to Potential Wildlife Sites and that applicants are required to protect or enhance these.</p>
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<p>Representation reference: 35/1/7</p> <p>Name: Historic England</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: Unsound.</p>	<p>Suggested changes: Subject to changes to the site specific allocations.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 57/1/3</p> <p>Name: Hardingstone Parish Council</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments: Whilst this states “Any proposal that comes forward should include suitable measures to mitigate the impact of additional traffic generated by the development” the council does not see how this can be done. There is already plans for 1000 houses as part of Hardingstone SUE and potential 500 from Hampton Green development. Newport Pagnell Road and others in the area are not suitable for this increased volume of traffic. We understand that the joint core strategy stated that with the Hardingstone SUE this area would be just about sustainable, so how can this extra traffic be justifiable. It is our belief that a lot of cars will be leaving on the Newport Pagnell Road to go to the A45 North, or South to M1 Junction 15 creating grid lock on the Queen Eleanor roundabout and J15 roundabout.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Traffic modelling has been undertaken by Northamptonshire County Council on behalf of Northampton Borough to assess the potential impacts of the development allocations proposed in the local plan and mitigation is a requirement of the policy.</p>
<p>Representation reference: 57/1/4</p> <p>Name: Hardingstone Parish Council</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments: There are also concerns that overdevelopment in this area could cause flooding on Brackmills estate.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Statutory consultees have been consulted and the policy in the local plan has been amended to reflect flooding concerns.</p>

<p>Representation reference: 57/1/5</p> <p>Name: Hardingstone Parish Council</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments: Overall the council feels there needs to be some joined up thinking in developments. There is a lot of development already approved along the Newport Pagnell Road and there are more on the proposed list which could cause serious infrastructure issues. The council also wonders if the numbers of housing needed needs reviewing in a post-covid world when the ways people commute may change.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The local plan seeks to deliver the housing requirements set out in the Joint Core Strategy and the allocation of sites has been based on evidence.</p>
<p>Representation reference: 65/1/11</p> <p>Name: English Regional Transport Association</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both shift traffic rather than removing it and the new road space will soon fill up with traffic. Furthermore it will also obliterate the track-bed of the old Northampton-Market Harborough railway line which the ERTA also wishes to see re-opened. St.James Inner Relief Road - This is a short-term project (apparently currently put on hold due to funds)and again, this will shift traffic rather than removing it and at best, given there is a considerable amount of commercial and domestic development in Northampton Borough, the new road space will soon fill up with traffic. It will also obliterate the old track-bed of the old Northampton - Bedford railway. There must be provision for a potential level crossing where the road crosses</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>

			the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).		
Representation reference: 65/1/17 Name: English Regional Transport Association	Refers to: Policy 38	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Housing: Since the above housing development(Site no.0333) is close to the main railway line, there should not be any housing development on that site. Moreover this could obliterate old railway track-beds. In any case the housing will encourage more road traffic, and the town's roads are frequently congested.	Suggested changes: None.	Officer comments: This site has been assessed in the Site Assessment Methodology and Land Availability Assessment (SAMLAA) which includes detailed investigations on matters associated with transport connections and sustainability. All development sites put forward in the Local Plan Part 2 have been modelled to assess their potential transport implications on the impact on the network.
Representation reference: 68/1/1 Name: Highways England	Refers to: Policy 38	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: 1104 Watering Lane, Collingtree - 265 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 68/1/2	Refers to: Policy 38	Legal compliance and soundness:	Comments: 1025 Land to the west of Towcester Road - 180 dwellings	Suggested changes: None.	Officer comments: Noted.

Name: Highways England		Legal compliance: - not specified Soundness: - not specified	There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.		
Representation reference: 68/1/3 Name: Highways England	Refers to: Policy 38	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: 0168 Rowtree Road - 131 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 68/1/4 Name: Highways England	Refers to: Policy 38	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: 0168 Rowtree Road - 131 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 68/1/5 Name: Highways England	Refers to: Policy 38	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: 0333 Northampton Railway Station rail freight - 200 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 68/1/6 Name: Highways England	Refers to: Policy 38	Legal compliance and soundness: Legal compliance: - not specified Soundness:	Comments: 1098 The Green, Great Houghton - 800 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport	Suggested changes: None.	Officer comments: Noted.

		- not specified	Assessments in order for their impacts to be appropriately assessed.		
Representation reference: 68/1/7 Name: Highways England	Refers to: Policy 38	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: 1113 Greyfriars - 400 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 68/1/8 Name: Highways England	Refers to: Policy 38	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: 1140 Land north of Milton Ham - 224 dwellings There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 68/1/9 Name: Highways England	Refers to: Policy 38	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: 1142 Land west of Northampton South - 130 There could be some impacts on the operation of the SRN as a result of additional vehicular demand associated with these sites. We would expect that these sites be subject to Transport Assessments in order for their impacts to be appropriately assessed.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 68/1/10 Name:	Refers to: Policy 38	Legal compliance and soundness: Legal compliance: - not specified	Comments: It is noted that the employment policies set out in the plan support the Northampton Economic Growth Strategy 2020-2025 adopted by the Council in May 2020. A few employment	Suggested changes: None.	Officer comments: The site area of each site can be seen in the SAMLAA

Highways England		Soundness: - not specified	sites have been allocated however the sizes have not been specified.		document. The number of jobs created will be dependent on the types of employment that will subsequently occupy the site.
Representation reference: 97/1/21 Name: Clayson Country Homes	Refers to: Policy 38	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In direct response to Policy 38, the respondent welcomes the reference to site 1025: land to the west of Towcester Road, and the conclusions within out earlier submissions in respect of this site remain. The site is, suitable, available and achievable and would secure a viable residential development.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 123/1/8 Name: Henry Martin Ltd	Refers to: Policy 38	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective	Comments: Policy 38 - Development Allocations (residential, employment, education and mixed use) Henry Martin Ltd is encouraged to see that the 1.4-hectare site to the north of Martin's Yard Business Park is sll identified as an employment allocation in Policy 38 (Site 1005). Henry Martin Ltd strongly support this proposed employment allocation.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 148/1/3 Name: St Clair Land and Developments LLP	Refers to: Policy 38	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: However, the inclusion of the site (Ref: 1101) as an employment allocation within emerging Policy 18 of the DPD has afforded the landowner a level of confidence to progress technical work in respect of the future development of the site.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 148/1/6 Name:	Refers to: Policy 38	Legal compliance and soundness: Plan is legally compliant.	Comments: It is agreed that an important challenge for Northampton, which the emerging LPP2 should seek to meet is that of housing delivery, However, to ensure that the significant level of residential growth proposed through the plan is sustainable,	Suggested changes: None.	Officer comments: Noted.

St Clair Land and Developments LLP		Plan is sound.	this development needs to be delivered in tandem with strategic level employment growth to ensure that rising employment needs are met. Additionally, through increasing the level of land for economic development purposes within the town, the LPA will be going some distance in bolstering the trend of in-commuting and create a robust hub within the Borough to assist the wider growth across the County.		
Representation reference: 148/1/7 Name: St Clair Land and Developments LLP	Refers to: Policy 38	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The document's acknowledgement of the challenges faced within the legislative boundary of Northampton is welcomed and only serves to highlight the significant opportunity which greenfield sites, such as the client's, offer to meeting the existing and future development needs of the Borough.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 148/1/20 Name: St Clair Land and Developments LLP	Refers to: Policy 38	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: In direct response to Policy 38, the respondent once again welcomes the reference to site 1101 Land at Waterside Way, and the conclusions within our earlier submissions in respect of this site remain. The site is, suitable, available and achievable and would secure a viable residential development.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 172/1/4 Name: Homes England	Refers to: Policy 38	Legal compliance and soundness: Plan is legally compliant. Soundness: - not specified	Comments: Homes England are taking forward landholdings throughout Northampton and welcome the following sites' allocation for housing and / or housing led development in Policy 13 Residential and Other Residential Led Allocation and Policy 38 Development Allocations. Ransome Road Gateway Gate Lodge, The Green, Great Houghton, Upton Reserve Site, Ransome Road.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 185/1/11	Refers to: Policy 38	Legal compliance and soundness: Plan is legally compliant.	Comments: We are pleased to see that the boundary of this allocation for 23 dwellings has been modified so that it no longer includes a section of Kingsthorpe Meadows Local Nature Reserve and	Suggested changes: None.	Officer comments: Noted.

<p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>		<p>Plan is sound.</p>	<p>Local Wildlife Site. Kingsthorpe Meadows already receives a high number of visitors and therefore, any additional pressure from new developments is concerning. For this allocation to be in line with Policies 27 (Green Infrastructure) and 29 (Supporting and Enhancing Biodiversity) it will need to carefully consider how it will provide a net gain in biodiversity within the application site and also contribute towards the enhancement of the wider green infrastructure in the area, including Kingsthorpe Meadows.</p>		
<p>Representation reference: 185/1/13</p> <p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: This policy has also been improved since the previous version of the Local Plan Part 2; however, it is still of concern as its potential link to the Upper Nene Valley Gravel Pits Special Protected Area (SPA) has not been established. The Habitats Regulations Assessment and Policy 41 requests 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. The area suggested for ecological enhancement within the proposal (Figure 20) 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. Policy 41 also lists a range of other issues to be considered within this allocation. We would strongly recommend that the over-wintering bird surveys are carried out as soon as possible so that the importance of the allocation (as functionally linked land) to the SPA and the mitigation/compensation which may be required are clearly established and used to reassess the suitability of the allocation.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Surveys are expected to be undertaken by the applicant and will be advised to undertake surveys at the outset. No change.</p>
<p>Representation reference: 195/1/20</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: In direct response to Policy 38, the respondent welcomes the reference to site 1107: Former Abington Mill Farm, Land of Rushmere Road, and the conclusions within out earlier</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

<p>Name: Mr B Cheer</p>		<p>Plan is sound.</p>	<p>submissions in respect of this site remain. The site is, suitable, available and achievable and would secure a viable residential development.</p> <p>However, we are aware of certain literature which has been circulating within the locale which seems to be seeking to encourage a swell of objection to the allocation of this site for residential purposes. The literature which has been circulated relates to two matters, the first being highways issues and the second being a conflict with planning policy. Given the content of the emerging Part 2 Local Plan, which allocates the site for residential development, the submissions which we expect the Council to receive are inadmissible. In terms of the highways issues which will be highlighted by respondents, it is confirmed by the respondent that any future application for the site will be supplemented by a full range of technical documents including a transport and highways assessment which will demonstrate the site's suitability and achievability.</p> <p>In conclusion, whilst it is considered that whilst the document would benefit from revisions as set out above, the document does present a plan led approach to meeting those issues which are faced within the Borough. Given the acute housing needs issues faced in the area in recent years, it is considered that the emerging development plan document provides a positive vision and outlines a bold approach and framework to meeting both housing needs and other economic, social and environmental priorities.</p>		
<p>Representation reference: 197/1/15</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments:</p> <p>16. It is noted that the Draft Plan considers whether additional sites may need to be allocated to ensure that the overall strategic housing requirement for the borough (18,870) can be delivered up to 2029.</p> <p>17. Collectively, it is inevitable that any additional allocations will place further pressures on existing infrastructure and as such it is expected that measures will need to be taken to address these, through securing developer contributions to</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			support delivery of additional capacity where required as a result of development.		
<p>Representation reference: 200/1/9</p> <p>Name: HBF</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Northampton LPP2 deals only with housing shortfalls from the five SUEs located in the Borough by proposing additional housing land allocations. The LPP2 allocates 71 housing / housing led sites for circa 3,804 dwellings as set out in Policies 13 & 38. Housing delivery is maximised, where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. The LPP2 allocations include a wide range of sites by both size and market locations, which should provide access to suitable land for small local, medium regional and large national housebuilding companies as well as providing opportunities for a wide range of different types of dwellings to meet the housing needs of all households.</p> <p>Under the 2019 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The Council should confirm compliance with this aspect of national policy.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The SAMLAA investigations concluded that 52% of sites allocated for housing are under 1 hectare.</p>
<p>Representation reference: 232/1/9</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not “sound” (para. 35 of the NPPF), in being neither “justified” (in not being “an appropriate strategy”) nor “effective” (in not being “deliverable over the Plan period”). Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites</p>	<p>Suggested changes: Would like sites 0168, 1009 and 1142 considered as 1 large site.</p>	<p>Officer comments: Agreed.</p>

			0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.		
<p>Representation reference: 232/1/12</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Vistry and Lagan have commissioned Define to determine the housing capacity of the land between the NSSUE and the railway line, taking account of the constraints affecting that capacity (noise and air pollution from the M1 motorway; noise and vibration from the Northampton Loop Line railway; the floodplain of the Wootton Brook; hedgerows within the site; utilities easements crossing the site; and land needed for public open space, children’s play provision and surface water drainage attenuation). Assuming a suitable average net density of 40 dwellings per hectare, Define has determined that the land between the NSSUE and the railway line can accommodate some 336 dwellings.</p> <p>The Council currently proposes 361 dwellings across the three sites (0168, 1009 and 1142), which would require an inappropriately high average net density of around 43 dwellings per hectare, resulting in an urban form that would be discordant with the average net density of 35 dwellings per hectare within the adjacent NSSUE. We consider that the ‘excess’ 25 dwellings that it is inappropriate to accommodate on sites 0168, 1009 and 1142 can and should be accommodated within the NSSUE itself, where it would be appropriate to increase the net density of housing in close proximity to its local centre and primary school above the currently permitted 35 dwellings per hectare. In this way, that area of the NSSUE close to its facilities can serve appropriately as its core.</p>	<p>Suggested changes: Consider the LPP2 indicative capacity is too high for sites LAA0168, 1009 and 1142 and that the excess should be accommodated within Northampton South SUE.</p>	<p>Officer comments: The current capacity of sites LAA0168, 1009 and 1142 in Policy 13 is indicative and not confirmed. However, as the sites is recommended to be combined, it is acceptable to change the trajectory. Modify the plan to take into account the revised trajectory for the combined sites.</p>

<p>Representation reference: 232/1/18</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p>Suggested changes: Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p>Officer comments: The respondent commented that these sites should be combined and a revised trajectory provided. This recommendation is considered acceptable. Modify Policies 13 and 38 and the Policies Map to reflect the recommended combined sites.</p>
<p>Representation reference: 233/1/9</p> <p>Name: Lagan Homes</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Nevertheless, although we welcome the proposed allocation of these three sites, we consider their identification as three separate sites in policies 13 and 38 and on the Policies Map and with a separate housing trajectory for each site (Appendix A) is not “sound” (para. 35 of the NPPF), in being neither “justified” (in not being “an appropriate strategy”) nor “effective” (in not being “deliverable over the Plan period”). Although the reason why the land immediately to the west of the NSSUE has been identified as three sites is well understood (because site 1142 came under developer control after sites 0168 and 1009 – indeed, not until after the Round 1 Proposed Submission consultation, at which point the development of site 1142 became deliverable), the contiguity of the three sites and their adjacency with the NSSUE mean it is not appropriate to conceive of them as three separate allocations. Rather, they should be planned not only as a single allocation, but also as one to be delivered in conjunction with the immediately adjoining NSSUE.</p>	<p>Suggested changes: Would like sites 0168, 1009 and 1142 considered as 1 large site.</p>	<p>Officer comments: This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the combined sites 0168, 1009 and 1142.</p>

<p>Representation reference: 233/1/12</p> <p>Name: Lagan Homes</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: Vistry and Lagan have commissioned Define to determine the housing capacity of the land between the NSSUE and the railway line, taking account of the constraints affecting that capacity (noise and air pollution from the M1 motorway; noise and vibration from the Northampton Loop Line railway; the floodplain of the Wootton Brook; hedgerows within the site; utilities easements crossing the site; and land needed for public open space, children’s play provision and surface water drainage attenuation). Assuming a suitable average net density of 40 dwellings per hectare, Define has determined that the land between the NSSUE and the railway line can accommodate some 336 dwellings.</p> <p>The Council currently proposes 361 dwellings across the three sites (0168, 1009 and 1142), which would require an inappropriately high average net density of around 43 dwellings per hectare, resulting in an urban form that would be discordant with the average net density of 35 dwellings per hectare within the adjacent NSSUE. We consider that the ‘excess’ 25 dwellings that it is inappropriate to accommodate on sites 0168, 1009 and 1142 can and should be accommodated within the NSSUE itself, where it would be appropriate to increase the net density of housing in close proximity to its local centre and primary school above the currently permitted 35 dwellings per hectare. In this way, that area of the NSSUE close to its facilities can serve appropriately as its core.</p>	<p>Suggested changes: Consider the LPP2 indicative capacity is too high for sites LAA0168, 1009 and 1142 and that the excess should be accommodated within Northampton South SUE.</p>	<p>Officer comments: The current capacity of sites LAA0168, 1009 and 1142 in Policy 13 is indicative.</p>
<p>Representation reference: 233/1/18</p> <p>Name: Lagan Homes</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the</p>	<p>Suggested changes: Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p>Officer comments: This recommendation is considered acceptable. Modify the plan and the Policies Map to</p>

		- not effective	replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.		reflect the combined sites 0168, 1009 and 1142.
Representation reference: 236/1/3 Name: CPRE	Refers to: Policy 38	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not consistent with national policy	Comments: All site specific policies which are within 3km of the Nene Valley should have a cross reference to Polices 27 and 30 Green Infrastructure and Upper Nene Gravel Pits . The Green at Gt Houghton has a cross reference to policy 30 but CPRE considers there are inconsistencies with other site specific policies , for instance Ransome Road which we consider is part of the Nene Valley green infrastructure corridor . We trust that these can be dealt with as part of the soundness exercise .	Suggested changes: All site specific policies which are within 3km of the Nene Valley should have a cross reference to Polices 27 and 30 Green Infrastructure and Upper Nene Gravel Pits.	Officer comments: All development proposals will be considered taking into account all the relevant policies contained in the local plan.
Representation reference: 239/2/2 Name: Duncan Investments Ltd - Houghton Gate	Refers to: Policy 38	Legal compliance and soundness: Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: In order to ensure that the Policy approach taken in Chapter 8 is sound it is considered that the NLP2 should allocate sufficient employment land to address the very significant quantitative and qualitative shortfall of industrial and warehousing land. The Houghton Gate site should be identified as an employment allocation to help meet this shortfall. The Houghton Gate site has the potential to help support a range of economic aspirations at the local and sub-regional level, particularly in terms of meeting Northampton Borough’s future growth needs.	Suggested changes: See detailed comments.	Officer comments: Noted.
Representation reference: 239/2/3 Name:	Refers to: Policy 38	Legal compliance and soundness: Plan is legally compliant.	Comments: Duncan Investments Ltd is currently seeking the allocation of the Houghton Gate site for employment development through the emerging NLP2. In August 2018, Duncan Investments Ltd	Suggested changes: Allocation of Houghton Gate for employment use.	Officer comments: A Sites Allocation Methodology and Land Availability

Duncan Investments Ltd - Houghton Gate		<p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	<p>submitted the site to the Local Plan Review 'call for sites' as a site for employment use. In June 2019, representations were submitted on the NLP2 Submission Draft Consultation (Round 1). However, the Houghton Gate site has not been allocated for employment use in the Round 2 Submission plan.</p> <p>Duncan Investments Ltd considers that the NLP2 fails to adequately and positively plan for new employment investment in line with the recommendations of the Council's own evidence base, and it is vitally important that land is allocated for employment development. It is considered that, the Houghton Gate site would be make a sustainable and important contribution to employment land supply and should therefore be allocated for employment use.</p> <p>Representations have also been prepared in response to the West Northamptonshire Strategic Plan [WNSP] Issues Consultation (October 2019) seeking the allocation and delivery of new employment land around Northampton, to help meet demand.</p> <p>Duncan Investments Ltd, is a local developer with a 35-year track record of developing around Northampton. Duncan Investments Ltd control all of the land which has no title or agricultural tenancy restrictions and would seek to bring the site forward immediately such that it would be delivered within the first 5 years of the Northampton Local Plan period.</p>		<p>Assessment (SAMLAA) has been produced as supporting evidence for the LPP2. The site (LAA0593 – North of Bedford Road) has been assessed as a part of the site selection process used in the SAMLAA for the LPP2. The site has been found to be unsuitable for allocation due the potential impact on the village of Great Houghton and its heritage assets, and due to its proximity to the Upper Nene Valley Gravel Pits SPA and Ramsar Site. No change.</p>
<p>Representation reference: 239/2/9</p> <p>Name: Duncan Investments Ltd - Houghton Gate</p>	<p>Refers to: Policy 38 and Employment allocation</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified - not effective 	<p>Comments: Duncan Investments Ltd considers that the only way to achieve this aim is through the allocation of additional employment sites, including land at Houghton Gate. Evidence has been provided to justify the proposed allocation including an Employment Land Needs Assessment which undertook the following actions:</p> <ol style="list-style-type: none"> 1. reviewed key planning policy documents and economic growth studies produced for Northampton as well as other published sub-regional studies and information that relate to 	<p>Suggested changes: Require Houghton Gate to be allocated.</p>	<p>Officer comments: NBC have met with the landowner and consultant, and requested sight of the evidence base which was never received (including Natural England's assessment of the</p>

		- not consistent with national policy	economic strategies, property markets, and relevant business and economic statistics; 2. interrogated latest available economic data and forecasts produced by Experian and reviewed other relevant commercial property market data; 3. reviewed commercial property market information for the Northampton area, particularly in relation to prevailing market dynamics and the need for strategic sites based on a Market Analysis undertaken by TDB Real Estate (reproduced in Appendix 1 of the ELNA); and, 4. assessed the proposed scheme at Houghton Gate in terms of the potential scale of the economic impacts of the site.		site). No modification required.
<p>Representation reference: 239/2/10</p> <p>Name: Duncan Investments Ltd - Houghton Gate</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Duncan Investments Ltd considers that the policy approach in Chapter 8 of the NLP2 would not meet the tests of soundness because:</p> <p>1. It is not Positively prepared: There is a clear need for additional industrial and warehousing land in Northampton from both a quantitative and qualitative perspective. The policy approach taken fails to adequately promote economic development and the furtherance of economic growth. It fails to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.</p> <p>2. It is not justified: The policy approach does not align with the Local Plan evidence base which concludes that there is an insufficient supply of large-scale units to meet demand over the course of the plan period. In addition, the JPU's current employment land evidence base's conclusion, that there is a need for 28,500 new jobs and 965,009 sqm of B- Class land, is flawed, makes no provision for losses, and is out of date given that this level of jobs growth has already been comfortably exceeded with no mechanism in place for identifying needs post 2029.</p>	<p>Suggested changes: In order to ensure that the Policy approach taken in Chapter 8 is sound it is considered that:</p> <p>1. The NLP2 should allocate sufficient employment land to address the very significant quantitative and qualitative shortfall of industrial and warehousing land.</p> <p>2. The Houghton Gate site should be identified as an employment allocation to help meet this shortfall.</p>	<p>Officer comments: Allocations for employment are included in Policy 38. Policy 17 safeguards existing employment land and Policy 18 supports employment provision outside of safeguarded employment sites that meet certain criteria. Employment land is also expected to come forward on Sustainable Urban Extensions around Northampton. No modification required.</p>

			<p>3. It is not effective: The NLP2 fails to identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. Planning policies should also be flexible to accommodate needs not anticipated in the Plan; and address the specific requirements of different industrial sectors. This is particularly relevant in the context of Northampton Borough's very substantial unmet industrial needs which risks undermining its future economic growth.</p> <p>4. It is not consistent with national policy: It does not contribute to the achievement of sustainable development, including the economic objective in the Framework to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.</p>	<p>The Houghton Gate site has the potential to help support a range of economic aspirations at the local and sub-regional level, particularly in terms of meeting Northampton Borough's future growth needs.</p>	
<p>Representation reference: 242/1/3</p> <p>Name: Robert de Vito Boutin</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not consistent with national policy</p>	<p>Comments: I believe the Northampton Local Plan to be unsound in two areas: it is not positively prepared in that there is land that could be added to the plan for development not currently included.</p>	<p>Suggested changes: See other comments.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 242/1/4</p> <p>Name: Robert de Vito Boutin</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared</p>	<p>Comments: It is not consistent with national policy because according to Chapter 2 "Northampton Now" Section A "A Profile of Northampton" Subsection € "Housing" para 2.12 the Council has "not been able to meet its 5 year housing land supply as required by the Government". The shortfall to 2019 was 2,340 houses. Additionally, Chapter 2 Section B "Key Challenges and Opportunities for Northampton" subsection (a) "Challenges" ii</p>	<p>Suggested changes: The proposed change that I consider necessary is to add a site of 9.62 acres in Great Houghton to Policy 38 "Development Allocations". The</p>	<p>Officer comments: The allocated sites within the LPP2 have been assessed through the Sites Allocation Methodology and Land Availability Assessment</p>

		- not consistent with national policy	'Housing Delivery' para 2.50 states; "Evidence shows that the Borough does not have a 5 year housing land supply".	<p>site is former Glebe Land to the north of the railway line that bisects the village, west of the conservation area, south of the border with the former Great Houghton Preparatory School and Brackmills Industrial Estate. The land connects to the village directly via Rectory Close, an access road which already serves five houses. Having spoken with Noreen we have agreed that my submission will be sent via SurveyMonkey and a site map will be emailed separately to the Planning Policy Inbox under the subject "Former Glebe land at Great Houghton".</p> <p>It can be seen from the map of the village "Great Houghton in 1900"</p>	(SAMLAA) process against a variety of criteria. Site LAA0327 (Martins Farm) has been assessed through this process and has been found to be not suitable for allocation due to proximity to Great Houghton and issues associated with heritage and coalescence. No modification required.
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				<p>published in the "Great Houghton Conservation Area Appraisal & Management Plan" Consultation Draft page 10 Para 4.4 that there was a building on the land at this time, located close to the northern boundary. There appears to be no trace of this building today, but the land has been built on in the past.</p> <p>Development could be residential, to help meet the housing shortage in the borough, or for an hotel to help meet the room shortage outlined in Chapter 2 of the Plan, Section A, subsection (g) "Tourism" para 2.26 and Table 4 'Northampton Projected Requirements for new Hotel Development 2019-</p>	
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				<p>2029' which gives the number of "Total New Hotel Rooms" required at between 298 and 553.</p> <p>Development would aim to be in line with all relevant policies. In addition, there are specific policies that relate to it and which it would aim to specifically satisfy:</p> <p>A: The number of houses or size of hotel would be appropriate specifically to support the economic, social and environmental conditions of Policy 1 "Sustainable Development". Residential development might consist of around 30 high value homes, providing each plot with an average of around</p>	
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				<p>a third of an acre of green space overall.</p> <p>B: Development would specifically aim to support Policy 2 “Placemaking” and the related Policy 3 “Design” in every respect, enhancing the unique village “feel” of Great Houghton with high quality buildings using suitable materials, even though it lies outside the Village Conservation Area.</p> <p>C: Development would specifically aim to support the requirements of Policy 4 “Amenity and Layout”. It has the distinct advantage of supporting Policy 27 “Green Infrastructure” and Policy 28 “Providing Open Spaces” in that it connects Great Houghton</p>	
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				<p>village directly for the first time to the Brackmills Country Park (Parks and Gardens) and is well within the maximum 720m walk from the large area of "Natural and Semi Natural Green Space" to the south.</p> <p>D: Development would specifically aim to support Policy 6 "Health and Wellbeing" by the nature of its location within a strong and vibrant village community.</p> <p>E: The land falls within the 3km zone adjacent to the Upper Nene Valley Gravel Pits Special protection Area, Ramsar Policies 29 & 30, which are being satisfied by the development to the south of the village known as "The</p>	
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				<p>Green" (Policy 41). Any additional requirements to protect the local habitat and bird life will be met where appropriate.</p> <p>The site fits well with Northampton Borough Council's Vision as set out in Chapter 3 "Vision and Borough Objectives" section (a) "Vision" para 3.2: "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 all its communities".</p>	
<p>Representation reference: 250/1/23</p> <p>Name: St Clair Land and Developments LLP Old Bedford Road</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: In direct response to Policy 38, the respondent once again welcomes the reference to site 1138 Land to South of Bedford Road, and the conclusions within our earlier submissions in respect of this site remain. The site is, suitable, available and achievable and would secure a viable residential development.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

<p>Representation reference: 251/1/30</p> <p>Name: Duncan Investments Ltd - Site E of Towcester Rd</p>	<p>Refers to: Policy 38</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Developers support the inclusion of Site 1102 'Site east of Towcester Road' allocated for residential development, as set out on the Policies Map.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 65/1/14</p> <p>Name: English Regional Transport Association</p>	<p>Refers to: para. 13.4</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Housing: Since the above housing development(Site no.0333) is close to the main railway line, there should not be any housing development on that site. Moreover this could obliterate old railway track-beds. In any case the housing will encourage more road traffic, and the town's roads are frequently congested.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: This site has been assessed in the Site Assessment Methodology and Land Availability Assessment (SAMLAA) which includes detailed investigations on matters associated with transport connections and sustainability. All development sites put forward in the Local Plan Part 2 have been modelled to assess their potential transport implications on the impact on the network.</p>

<p>Representation reference: 153/1/1</p> <p>Name: Network Rail</p>	<p>Refers to: para. 13.6 and Policy 39</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: The draft policy 39 states that “Network Rail has indicated that subject to the current and future freight/ commercial operation being moved elsewhere, this opens up the potential for the residual railway land to be developed”. Following discussion with Network Rail, it was concluded that this comment relates to para 13.6</p>	<p>Suggested changes: Amend paragraph to read: "Network Rail has indicated that subject to the provision of a suitable replacement site to accommodate rail freight activities, this opens up the potential for the residual railway land to be developed".</p>	<p>Officer comments: The changes recommended are considered acceptable. Modify the plan to state: Amend paragraph 13.6 to read: "Network Rail has indicated that subject to the provision of a suitable replacement site to accommodate rail freight activities, this opens up the potential for the residual railway land to be developed".</p>
<p>Representation reference: 35/1/9</p> <p>Name: Historic England</p>	<p>Refers to: Policy 39</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: The text is much improved and draws on the production of the HIA and its revisions to highlight the sensitivity and the levels of truncation in the inner bailey area and castle mound. The policy however remains unsound without amendment.</p>	<p>Suggested changes: The first policy criteria bullet point should be amended to read “A high quality development that preserves and enhances the significance and appreciation of the former castle site, its designated components and their setting. Design and capacity</p>	<p>Officer comments: it is agreed that a proposed modification will clarify the policy. Modify the first criteria bullet point to Policy 39 to read: "high quality development that preserves and enhances the significance and appreciation of the former castle site, its designated</p>

				<p>will be informed by detailed archaeological investigations and assessments in advance of development". This would ensure that the archaeology continues to guide the development that comes forward and ensures that Historic England can comment fully at planning application stage.</p> <p>Historic England would be happy to agree this and all other changes suggested below by SOCG.</p>	<p>components and their setting. Design and capacity will be informed by detailed archaeological investigations and assessments in advance of development"</p>
<p>Representation reference: 53/1/12</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: Policy 39</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>Comments: We welcome the reference made to maximising the use of Sustainable Drainage Systems on site subject to a detailed assessment being prepared.</p> <p>As set out in the Proposed Submission Local Plan there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.</p>	<p>Suggested changes: Add new paragraph to supporting text to read: 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</p>	<p>Officer comments: It is agreed that an additional paragraph to support Policy 39 would clarify the position. It is recommended that the plan be modified to include a new paragraph to</p>

				<p>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.'</p>	<p>supporting text of Policy 39 to read: 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.'</p>
<p>Representation reference: 53/1/13</p> <p>Name:</p>	<p>Refers to: Policy 39</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: Add new criterion to Policy 39: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'</p>	<p>Suggested changes: Add new criterion to Policy 39: 'the safeguarding of suitable access</p>	<p>Officer comments: It is agreed that a proposed modification to the plan will strengthen</p>

Anglian Water Services Limited		Plan is unsound: - not effective		for the maintenance of foul drainage infrastructure.'	Policy 39. Modify the plan to include a new criterion to Policy 39: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'
Representation reference: 65/1/16 Name: English Regional Transport Association	Refers to: Policy 39	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Housing: Since the above housing development(Site no.0333) is close to the main railway line, there should not be any housing development on that site. Moreover this could obliterate old railway track-beds. In any case the housing will encourage more road traffic, and the town's roads are frequently congested.	Suggested changes: None.	Officer comments: This site has been assessed in the Site Assessment Methodology and Land Availability Assessment (SAMLAA) which includes detailed investigations on matters associated with transport connections and sustainability. All development sites put forward in the Local Plan Part 2 have been modelled to assess their potential transport implications on the impact on the network.
Representation reference: 197/1/17	Refers to: Policy 39	Legal compliance and soundness: Legal compliance: - not specified	Comments: 19. All Site Specific Policies within this chapter (and in particular Policy 41) will require substantial mitigation	Suggested changes: Each of the Site Specific Policies should therefore be	Officer comments: All site specific policies will need to comply with other

<p>Name: Northamptonshire County Council</p>		<p>Soundness: - not specified</p>	<p>measures and supporting infrastructure to be provided, both for on-site and off-site measures.</p>	<p>amended to include specific reference to the importance of any scheme complying with Policy 37 – Infrastructure to ensure sustainability and address any negative impacts of development of this scale.</p>	<p>relevant generic development policies in the plan so it is not considered necessary to list them, including Policy 37.</p>
<p>Representation reference: 234/1/9</p> <p>Name: Diversified Property Fund For Charities</p>	<p>Refers to: Policy 39</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The redevelopment of Northampton Railway Station and surrounding land is obviously a key aspiration for the NLPP2, with Policy 39 (and the supporting figure) providing details as to how these proposals should be delivered. The junction of Wilmington Terrace and St Andrew’s Road is identified for junction improvements as part of the proposals.</p> <p>Whilst the Trade Park is not accessed directly from this junction, Wilmington Terrace forms the southern boundary and St Andrew’s Road the western boundary of the Trade Park with the accesses points into the Trade Park being from junctions with these roads (Quorn Way and Francis Street).</p>	<p>Suggested changes: It is essential that any junction improvements continue to ensure high quality and unfettered vehicular access into the Trade Park. If subsequent iterations of the plan are to contain additional information about these junction improvements DPFC would welcome the opportunity to be consulted and provide comments.</p>	<p>Officer comments: Noted.</p>

<p>Representation reference: 241/1/10</p> <p>Name: British Horse Society</p>	<p>Refers to: Policy 39</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Pedestrians and cyclists are included in the policy. Opportunities to expand the PRoW network and link to existing PRoW's are to be welcomed but not to disadvantage equestrians. Surfacing of routes should be considered by developers, for example the permeable and durable flexi-pave/rubber crumb is environmentally and economically more sustainable as well as suiting all users of new multi-use routes.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Minor modification proposed to Policy 32 to refer to integration with public rights of way.</p>
<p>Representation reference: 65/1/8</p> <p>Name: English Regional Transport Association</p>	<p>Refers to: para. 13.10</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both shift traffic rather than removing it and the new road space will soon fill up with traffic. Furthermore it will also obliterate the track-bed of the old Northampton-Market Harborough railway line which the ERTA also wishes to see re-opened. St.James Inner Relief Road - This is a short-term project (apparently currently put on hold due to funds)and again, this will shift traffic rather than removing it and at best, given there is a considerable amount of commercial and domestic development in Northampton Borough, the new road space will soon fill up with traffic. It will also obliterate the old track-bed of the old Northampton - Bedford railway. There must be provision for a potential level crossing where the road crosses the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>

<p>Representation reference: 65/1/9</p> <p>Name: English Regional Transport Association</p>	<p>Refers to: para. 13.11</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both shift traffic rather than removing it and the new road space will soon fill up with traffic. Furthermore it will also obliterate the track-bed of the old Northampton-Market Harborough railway line which the ERTA also wishes to see re-opened. St.James Inner Relief Road - This is a short-term project (apparently currently put on hold due to funds)and again, this will shift traffic rather than removing it and at best, given there is a considerable amount of commercial and domestic development in Northampton Borough, the new road space will soon fill up with traffic. It will also obliterate the old track-bed of the old Northampton - Bedford railway. There must be provision for a potential level crossing where the road crosses the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p>Representation reference: 53/1/14</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: Policy 40</p>	<p>Legal compliance and soundness: Plan is legally compliant. Plan is sound.</p>	<p>Comments: Policy 40 Martin's Yard Extension - SUPPORT We welcome the reference made to maximising the use of Sustainable Drainage Systems on site subject to a detailed assessment being prepared. Similarly we welcome the reference made to considering the location of the existing water main and foul sewer as part of</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			the site layout to ensure access can be maintained following construction.		
<p>Representation reference: 65/1/10</p> <p>Name: English Regional Transport Association</p>	<p>Refers to: Policy 40</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened. Northampton North –West and Northern Relief Roads - These will both shift traffic rather than removing it and the new road space will soon fill up with traffic. Furthermore it will also obliterate the track-bed of the old Northampton-Market Harborough railway line which the ERTA also wishes to see re-opened. St.James Inner Relief Road - This is a short-term project (apparently currently put on hold due to funds)and again, this will shift traffic rather than removing it and at best, given there is a considerable amount of commercial and domestic development in Northampton Borough, the new road space will soon fill up with traffic. It will also obliterate the old track-bed of the old Northampton - Bedford railway. There must be provision for a potential level crossing where the road crosses the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The route of the former Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p>Representation reference: 123/1/2</p> <p>Name: Henry Martin Ltd</p>	<p>Refers to: Policy 40</p>	<p>Legal compliance and soundness: Plan is unsound: - not effective</p>	<p>Comments: Changes have been made to the Policies Map which have the potential to create ambiguity following the adoptions of the Northampton Local Plan Part 2. This is because Figure 19 in the Northampton Local Plan Part 2 Submission Draft Round 2</p>	<p>Suggested changes: See other comments.</p>	<p>Officer comments: Noted.</p>

			<p>shows that the area of land to the north of Martin's Yard Business Park is an employment allocation. This is confirmed in Policy 38 and Policy 40. However, the revised Policies Map does not show this area as an 'Employment Allocation Site' (which should be shaded in light purple). Instead, it shows the expansion site as 'Natural and Semi Natural Green Space' (shaded in light green) and a 'Local Wildlife Site' (brown dots). The policies that are associated with the 'Natural and Semi Natural Green Space' designation and the 'Local Wildlife Site' conflict with Policy 38 and Policy 40 which collectively seek to deliver new employment development on the 1.4-hectare site to the north of the Martin's Yard Business Park.</p> <p>The discrepancies outlined above give rise to policy conflicts, which threaten the deliverability of the Martin's Yard Extension (LAA1005) and thus make the Policies Map unsound. Should these discrepancies be rectified as set out below, it is considered that the Policies Map would be sound:</p> <ul style="list-style-type: none"> * Identify the 1.4-hectare employment allocation to the north of Martin's Yard Business Park that is shown on Figure 19 in the Northampton Local Plan Part 2 Submission Draft Round 2 with light purple shading on the Policies Map. * Amend the 'Natural and Semi Natural Green Space' (light green shading), so that it does not overlap the site allocated for employment development (as per the Policies Map that accompanied the Local Plan Part 2 Submission Draft (April 2019)). * Amend the Policies Map so that the area covered by the 'Local Wildlife Site' designation does not prevent the 1.4-hectare employment allocation to the north of Martin's Yard Business Park coming forward for employment development in the future. <p>Please refer to the accompanying written representations for further information.</p>		
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<p>Representation reference: 123/1/9</p> <p>Name: Henry Martin Ltd</p>	<p>Refers to: Policy 40</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>Comments: Policy 40 - Martin's Yard Extension (LAA1005) Henry Main Ltd is pleased to see that, following discussions with the Council over recent years, the decision has been taken to allocate Site 1005 for employment development. The allocation of Site 1005 for employment uses will provide the owners of the site with the opportunity to reconfigure, upgrade and extend the Business Park. This will enable Martin's Yard Business Park to accommodate the expansion plans of the businesses currently operating from the site and also has the potential to attract new business investment to the area. Furthermore the allocation of Site 1005 for employment development accords with PolicyS8(1) of the West Northamptonshire Joint Core Strategy which seeks to concentrate the majority of new job growth within the principal urban area of Northampton. Similarly, it will also make a positive contribution towards creating 28,500 new jobs in the West Northamptonshire area over the plan period in line with Policy S7 of the West Northamptonshire Joint Core Strategy. The above factor will make a positive contribution towards facilitating business growth and creating new job opportunities in accordance with paragraph 80 of the NPPF.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 123/1/10</p> <p>Name: Henry Martin Ltd</p>	<p>Refers to: Policy 40</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>Comments: Moreover, as set out in Policy 40, the allocation of Site 1005 for employment will create a unique opportunity for the site's owners to work proactively with the Council and other organisations to conserve, manage and enhance the Kingsthorpe Mire Local Wildlife Site. The exact nature of the ecological enhancements will be subject to detailed discussions with the Council as part of the planning process. It is envisaged that these ecological improvements will support the Council's future plans for the Kingsthorpe Mire Local Wildlife Site as set out in the Northampton Green Infrastructure Plan (May 2016).</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

			As a result, the allocation of Site 1005 for employment development will also make a positive contribution towards managing, conserving and enhancing the quality of Northampton's strategic green infrastructure network, biodiversity corridors and wildlife habitats in line with the general thrust of national and local planning policies.		
Representation reference: 123/1/11 Name: Henry Martin Ltd	Refers to: Policy 40	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective	Comments: Overall, it is considered that Policy 40 has been positively prepared, is a justified and effective approach to take towards the extension of Martin's Yard Business Park and is consistent with the NPPF.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 123/1/12 Name: Henry Martin Ltd	Refers to: Policy 40 and policies map	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective	Comments: As was the case with the Policies Map that accompanied the Local Plan Part 2 Submission Draft (April 2019), the Key for the Policies Map that accompanies the current Northampton Local Plan Part 2 Submission Draft Round 2 indicates that the sites on the Policies Map that are shaded in light purple are 'Employment Allocation Sites'. The employment allocation to the north of Martin's Yard Business Park was shaded in light purple on the Policies Map that accompanied the Local Plan Part 2 Submission Draft (April 2019) 2. However, it is noted that whilst Policy 40 (Martin's Yard Extension (LAA1005)) and Figure 19 of the Northampton Local Plan Part 2 Submission Draft Round 2 collectively confirm that the 1.4-hectare site to the north of Martin's Yard Business Park is subject to an employment allocation, this area is not shaded in light purple on the Policies Map that accompanies the current Northampton Local Plan Part 2 Submission Draft Round 2. Despite this, many of the other sites that were shaded light purple on the Policies Map for the Local Plan Part 2 Submission Draft (April 2019) are still shaded in light purple on the Policies	Suggested changes: To rectify these discrepancies, it is respectfully requested that the employment allocation to the north of Martin's Yard Business Park is shaded in light purple on the revised Policies Map.	Officer comments: It is agreed that the Policies Map need clarifying. Modify the Policies Map (site LAA1005) to highlight the area allocated for employment in purple.

			Map that accompanies the current Northampton Local Plan Part 2 Submission Draft Round 2.		
Representation reference: 123/1/14 Name: Henry Martin Ltd	Refers to: Policy 40 and policies map	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective	Comments: The Key for the revised Policies Ma implies that proposals affecting land identified as 'Natural and Semi Natural Green Space' will be assessed against Policy 28 (Providing Open Spaces). Policy 28 states: "New major developments must ensure that open spaces defined on the Policies Map are sustained or enhanced." It will not be possible to construct the new employment development identified in Policy 40 and sustain the existing amount of 'Natural and Semi Natural Green Space' on the site as required by Policy 28. Therefore, in its current format, the Policies Map gives rise to a conflict between Policy 40 and Policy 28.	Suggested changes: As such, it is respectfully requested that the area of land to the north of Martin's Yard Business Park that is identified as an employment allocation in Figure 19 of the Northampton Local Plan Part 2 Submission Draft Round 2 is removed from the 'Natural and Semi Natural Green Space' designation on the revised Policies Maip (as it was on the Policies Map that accompanied the Local Plan Part 2 Submission Draft (April 2019)).	Officer comments: It is agreed that the Policies Map need clarifying. Modify the Policies Map (site LAA1005) to highlight the area allocated for employment in purple.
Representation reference: 123/1/15 Name: Henry Martin Ltd	Refers to: Policy 40 and policies map	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective	Comments: Furthermore, the Key for the revised Policies Map implies that development proposals relating to a 'Local Wildlife Site' will need to comply with Policy 26 and Policy 29. Policy 26 relates to sites for burial space, so it would appear that reference to this policy has been included in error in the Key for the Policies Map. Policy 29 seeks to support and enhance biodiversity. As	Suggested changes: Changes to Policies Map.	Officer comments: It is agreed that the Policies Map need clarifying. Modify the Policies Map (site LAA1005) to highlight the area

			explained above, the site's owners intend to work with the Council and other organisations to conserve, manage and enhance the Kingsthorpe Mire Local Wildlife Site in the area of land to the north and east of the new employment site. The third bullet point in Policy 40 provides the necessary provisions to secure these ecological and green infrastructure enhancements and net biodiversity gains. Additionally, it is noted that the 'Local Wildlife Site' designation was not shown on the Policies Map that accompanied the Local Plan Part 2 Submission Draft (April 2019). In light of these factors, it is respectfully requested that the Policies Map is amended so that the area covered by the 'Local Wildlife Site' designation does not prevent the 1.4-hectare expansion site to the north of Martin's Yard Business Park from coming forward for employment development in the future.		allocated for employment in purple.
Representation reference: 197/1/18 Name: Northamptonshire County Council	Refers to: Policy 40	Legal compliance and soundness: Legal compliance: - not specified Soundness: - not specified	Comments: 19. All Site Specific Policies within this chapter (and in particular Policy 41) will require substantial mitigation measures and supporting infrastructure to be provided, both for on-site and off-site measures.	Suggested changes: Each of the Site Specific Policies should therefore be amended to include specific reference to the importance of any scheme complying with Policy 37 – Infrastructure to ensure sustainability and address any negative impacts of development of this scale.	Officer comments: All site specific policies will need to comply with other relevant generic development policies in the plan so it is not considered necessary to list them, including Policy 37.
Representation reference: 65/1/12	Refers to: Chapter 13	Legal compliance and soundness: Legal compliance:	Comments: Movement – The trackbeds of the old railway lines between Northampton and Market Harborough and Northampton	Suggested changes: None specified.	Officer comments: The route of the former

<p>Name: English Regional Transport Association</p>		<p>- not specified</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Castle – Brackmills must be protected for restoration for railway use; there should also be provision for eventual re-opening of that line to Bedford, improving more connectivity. There must be new stations/halts at Watermills (new University campus) and at Brackmills (industrial estate); furthermore the old Bridge Street station should also be re-opened and the ERTA also wishes to see the Northampton – Wellingborough line re-opened.</p> <p>Northampton North –West and Northern Relief Roads - These will both shift traffic rather than removing it and the new road space will soon fill up with traffic. Furthermore it will also obliterate the track-bed of the old Northampton-Market Harborough railway line which the ERTA also wishes to see re-opened.</p> <p>St.James Inner Relief Road - This is a short-term project (apparently currently put on hold due to funds)and again, this will shift traffic rather than removing it and at best, given there is a considerable amount of commercial and domestic development in Northampton Borough, the new road space will soon fill up with traffic. It will also obliterate the old track-bed of the old Northampton - Bedford railway. There must be provision for a potential level crossing where the road crosses the old track-bed (also see APPENDIX D - Transport and Infrastructure Schedule).</p>		<p>Northampton to Market Harborough railway line is safeguarded in Policy 34 and on the Policies Map. It is proposed to modify the plan to include the railway corridor to Brackmills for future transport use.</p>
<p>Representation reference: 30/1/10</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments: The second item in the bulleted list, regarding the opportunity to create woodland and other habitats, is not a criterion but an observation and in my view does not belong in the policy wording. It would be more appropriate in the supporting text.</p>	<p>Suggested changes: The second item in the bulleted list, regarding the opportunity to create woodland and other habitats, is not a criterion but an observation and in my view does not belong in</p>	<p>Officer comments: Agreed modification to Policy 41: Move second bullet criteria from Policy 41 to supporting text.</p>

				the policy wording. It would be more appropriate in the supporting text.	
<p>Representation reference: 30/1/11</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI</p> <p>Plan is unsound: - not justified - not consistent with national policy</p>	<p>Comments: The seventh bullet refers to a buffer but does not indicate what is to be buffered, only where the buffer is to be located. I think some clarification on this point would help make the policy easier for case officers to deliver on the ground.</p>	<p>Suggested changes: The seventh bullet refers to a buffer but does not indicate what is to be buffered, only where the buffer is to be located. I think some clarification on this point would help make the policy easier for case officers to deliver on the ground.</p>	<p>Officer comments: It is agreed that a proposed modification to Policy 41 will provide clarification. Suggested modification in brackets (): 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 (that separates the allocated site from Great Houghton, and Great Houghton from Brackmills Industrial Estate). Appropriate types of habitat and accessibility are to be determined following surveys for Special Protection Area birds</p>

<p>Representation reference: 35/1/10</p> <p>Name: Historic England</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: Sound. The policy amendments following the HIA are welcomed.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 53/1/15</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>Comments: Policy 41 The Green, Great Houghton -OBJECT (in part) - EFFECTIVE POLICY 41 Reference to the incorporation for Sustainable Drainage Systems was included in Policy 36 of the Propsoed Submission Local Plan (now Policy 41). However this appears to have been removed from the current version of the plan. To ensure the policy is effective we would ask that reference be made to the requirement to maximise the use of SuDs on site subject to a detailed assessment which appears in the other allocation site policies in the Part 2 Local Plan.</p>	<p>Suggested changes: Add new criterion to Policy 41: '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>As set out in the Proposed Submission Local Plan there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can</p>	<p>Officer comments: It is agreed that a proposed modification to Policy 41 will strengthen it. It is recommended that the plan be modified and a new criterion be added to Policy 41: 'Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems (SuDS).'</p>

				continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.	
<p>Representation reference: 53/1/16</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>Comments: As set out in the Proposed Submission Local Plan there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.</p> <p>Add new paragraph to supporting text to read: 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.'</p>	<p>Suggested changes: Add new paragraph to supporting text to read: 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</p>	<p>Officer comments: It is agreed that a proposed modification to would clarify the position with regards to the area in Anglian Water's ownership. Modify the plan by adding a new paragraph to the existing supporting text of Policy 41 to read: 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</p>

				public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.'	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.'
Representation reference: 53/1/17 Name: Anglian Water Services Limited	Refers to: Policy 41	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective	Comments: Add new criterion to Policy 41: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'	Suggested changes: Add new criterion to Policy 41: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'	Officer comments: It is agreed that a proposed modification to the policy will strengthen it. Modify the plan by adding a new criterion to Policy 41: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'
Representation reference: 68/1/11 Name: Highways England	Refers to: Policy 41	Legal compliance and soundness: Legal compliance: - not specified	Comments: The plan also explains that to accommodate The Green, Great Houghton residential allocation site for 800 dwellings, the eastern approach of the A45 Barnes Meadow junction would need upgrading including widening the bridge. We would	Suggested changes: None.	Officer comments: Noted.

		Soundness: - not specified	welcome further engagement with the Council as this site progresses to determine the impacts on the A45.		
Representation reference: 105/1/2 Name: Great Houghton Parish Council	Refers to: Policy 41	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: The Parish Council representation sets out below how the allocation of The Green at Great Houghton fails to meet the NPPF's tests of soundness. This representation shows that the allocation of this site is not positively prepared, justified, effective or consistent with national planning policy. Positively prepared To be positively prepared Local Plan Part 2 should provide "a strategy which, as a minimum, seeks to meet the area's objectively assessed need; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development." (NPPF, paragraph 35).	Suggested changes: See other comments.	Officer comments: Noted.
Representation reference: 105/1/9 Name: Great Houghton Parish Council	Refers to: Policy 41 and Appendix C	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Northamptonshire County Council in their letter dated 3rd April 2020 concerning Traffic Modelling and Analysis make the following comments on The Green allocation: "As I have commented previously, the location and topography of site 1098 (The Green, Houghton) suggests that it will connect to The Green. This a minor unclassified road which is likely to require significant upgrading to accommodate development on this scale. While access from The Green is possible to both Newport Pagnell Road and Bedford Road, little traffic is heading to the latter which appears to be the result of the cumulative impacts of all the various developments in that area. The V/C ratios on the eastern Bedford Road approach to the Barnes Meadow interchange are in the 100-100% range in the AM peak do- minimum scenario (without the plan allocations) and are unchanged in the do-something scenario (with the plan allocations). The traffic flows difference plots show that flows	Suggested changes: None specified.	Officer comments: Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around access to the site. Policy 37 requires major development proposals to contribute to infrastructure

			<p>are barely changed, but do indicate additional flow through the Brackmills industrial estate which would appear to be traffic avoiding the Bedford Road.</p> <p>Combined with knowledge of the existing traffic situation in the area, this would indicate that some significant upgrading of the eastern Bedford Road approach to the Barnes Meadow roundabout will be required, specifically the widening of the river bridge (which being so close to the A45 is a constraint on stacking capacity at the signal stop line).</p> <p>While this will not be cheap, it should be noted that the design of the bridge does enable relatively easy widening, as this was done on the similar structure west of the A45 some years ago. It should be noted that there is also a discernible movement off traffic off Newport Pagnell Road which is rat-running through Brackmills to reach the A45 at Brackmills Interchange, but this impact may be mitigated if it is easier for traffic from The Green to exit via Bedford Road.”</p> <p>21. This response fails to take account of any impact on the existing village of Great Houghton. Additional traffic generated by the development will have a severe impact on Great Houghton village.</p>		<p>associated with and resulting from the scheme.</p> <p>Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation). No modification required.</p>
<p>Representation reference: 105/1/10</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: Policy 41 and Appendix C</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The County Council identify The Green – “as a minor unclassified road which is likely to require significant upgrading to accommodate development on this scale”. In reality this is an unlit single track road with passing places and blind bends. At the moment, the edges of the road break down, especially during winter, creating large potholes which need regular repair. There is frequent fly tipping in the passing places. At present this route does not cope with its current traffic usage.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around acces to the site.</p>

					<p>Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme.</p> <p>Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation).</p> <p>No modification required.</p>
<p>Representation reference: 105/1/11</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: Policy 41 and Appendix C</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Green is bordered by agricultural land and, whilst at a cost, this route could potentially be improved, such an improvement fails to take account of the extra traffic passing along the High Street in the village, a road which cannot be upgraded. Existing problems within the village will only deteriorate further.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around access to the site.</p>

					<p>Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme.</p> <p>Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation).</p> <p>No modification required.</p>
<p>Representation reference: 105/1/12</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The impact of increased traffic along the village’s main thoroughfare, Great Houghton High Street, and at the junction of this route with the A428 Bedford Road to the north of the village needs to be re-considered.</p> <p>Great Houghton High Street (“The High Street”) runs north/south through the village and is single carriageway in both directions. The High Street is narrow, with parked cars at various points, especially where local homes have no off- street car parking. This reduces traffic speeds and creates numerous bottlenecks. Nevertheless, some drivers and cyclists speed, particularly when heading downhill in a northward direction.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around acces to the site.</p>

			<p>Pedestrians using the length of the High Street have to regularly cross the road as there is pavement on one side only in places. This includes children using school buses from Little Houghton Primary School and Wollaston School and anyone using the Village Hopper bus (they all stop at the White Hart pub).</p> <p>National Cycle Route 6 passes up the High Street from the disused railway line at the Glebe and then passes along the Green. It is well used and provides an opportunity to improve health and active lifestyles. However, there is an incompatibility between these aims and the additional traffic created by development at The Green that will use the cycle route, making it significantly less safe for cyclists and deterring users of this mode of travel.</p> <p>The High Street is not suitable for HGVs. Formal warning signs have been placed with regard to HGVs entering the village. This does not deter such use and leads to such vehicles mounting footways.</p> <p>There are roughly 300 homes in Great Houghton. If 800 new homes are to be built on The Green housing allocation, and assuming a minimum of 2 cars per new dwelling, 1,600 extra vehicles will potentially use The Green. The County Council assumption is that The Green (with significant upgrading) will be used, but that assumption fails to take into account the impact on the High Street, usage and detrimental impact will increase significantly.</p>		<p>Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme.</p> <p>Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation).</p> <p>No modification required.</p>
<p>Representation reference: 105/1/13</p> <p>Name:</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: At the north of the village the High Street meets the A428. The A428 has a 60mph speed limit. There have been accidents, including fatalities, at the junction. Villagers must use this junction and turn east to access the local school/Post</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Appendix C states that Transport Assessments will be required for</p>

Great Houghton Parish Council		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Office/church which are all in Little Houghton. This manoeuvre can take significant time and is difficult and dangerous to make.		development proposals. These may indicate the need for localised improvement works, particularly around access to the site. Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme. Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation). No modification required.
Representation reference: 105/1/14 Name:	Refers to: Policy 41	Legal compliance and soundness: Plan is legally compliant.	Comments: 31. Additionally, although there are two lanes at the junction, the two-lane stretch is only a few car lengths long. So, once a handful of cars are waiting to turn east, those wishing to turn west and head into Northampton cannot get past them to	Suggested changes: None specified.	Officer comments: Appendix C states that Transport Assessments will be required for

Great Houghton Parish Council		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	access the west bound lane and a queue forms up through the village. Given the wait time to turn, the queue moves slowly.		development proposals. These may indicate the need for localised improvement works, particularly around access to the site. Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme. Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation). No modification required.
Representation reference: 105/1/15 Name:	Refers to: Policy 41	Legal compliance and soundness: Plan is legally compliant.	Comments: This effect is exacerbated when there is any problem on the A45 or the M1 (we also note that in their response dated 3rd November 2017 to the Sites Consultation, Highways England raised their concerns about new site allocations impact on the	Suggested changes: None specified.	Officer comments: Appendix C states that Transport Assessments will be required for

Great Houghton Parish Council		<p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	<p>Strategic Route Network). The Green (see below) is the quickest route from Wootton to the A428 and cars use the High Street and Green as part of a cross country route between the A45/M1 and the A428. The wait time in particular to make the eastbound turn is then extended. Essentially, because of the slow turn, even just a few additional cars result in a significant wait. A queue of cars may also be seen waiting to turn south on the A428 to go south, up the High Street.</p> <p>There is no way to widen the High Street, as there are houses on either side of its length. Much of this route is also within the Conservation Area.</p>		<p>development proposals. These may indicate the need for localised improvement works, particularly around access to the site.</p> <p>Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme.</p> <p>Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation).</p> <p>No modification required.</p>
<p>Representation reference: 105/1/16</p> <p>Name:</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: The village and The Green site are poorly served by public transport. The Sustainability Appraisal refers to buses on the A428 Bedford Road. It is difficult to understand how these would be used by residents of The Green.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Policy 32 of the LPP2 requires developments to demonstrate</p>

Great Houghton Parish Council		Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	This is some 2km (straight line) distant from The Green site allocation. This is considered beyond reasonable for bus users to consider using. The bus stops on the A428 are already difficult for more nearby residents of Great Houghton village to use, particularly those with mobility problems, being accessed via the High Street, the problems of which have already been highlighted. Access for those going eastbound, or returning from Northampton, would also entail crossing the Bedford Road to gain access to the village/The Green site, there have been two recent fatalities in this area of bus users crossing this road. Bus is not considered an option for The Green site.		sustainable travel principles including accessibility and usability of public transport and maximising opportunities for walking and cycling. No modification required.
Representation reference: 105/1/17 Name: Great Houghton Parish Council	Refers to: Policy 41	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy	Comments: Great Houghton is a village which has grown organically through small developments. The centre of the village is a Conservation Area; this includes the portion of the High Street that would be affected by additional traffic and queueing. The development of 800 new dwellings is out of scale with the village and will begin the gradual erosion of the separation of the village from Northampton. The village will lose its separate identity. At the moment, leaving the village to the south and travelling towards The Green allocation land, beyond Leys Lane (the entrance to the village hall and playing field), one enters open countryside. This open land is an integral part of the setting of the village and its detachment from other built development. This is noted in the Conservation Area Appraisal "The visual separation between Great Houghton and the built-up area makes a major contribution to the setting and to the character and appearance of the Conservation Area." (page 16, https://www.northampton.gov.uk/info/200207/building_conservation_and_trees/1629/great_houghton_conservation_area).	Suggested changes: None specified.	Officer comments: Policy 41 of the LPP2 sets out that any proposed scheme will need to take into account the sensitivities and significance of the setting of Great Houghton and the Conservation Area. No modification required.

<p>Representation reference: 105/1/18</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Allocation of this site will also lead to loss of Grade 2 agricultural land and functionally linked habitat for golden plover and lapwing linked to the Special Protection Area. On these matters the Council's own SAMLA concludes: "Significant negative effect likely on proximity of designated sites/ on avoid loss of greenfield land/ on avoid loss of high quality agricultural land." Rather than deal with these issues now Policy 41 merely says they will be subject to further study and suitable mitigation.</p>	<p>Suggested changes: Without knowing the impact development of The Green may have the site should not be allocated.</p>	<p>Officer comments: The SAMLAA identifies loss of agricultural land but would contribute positively to housing provision. Surveys are required to understand further, whether the site is used for over-wintering birds associated with the Upper Nene Valley Gravel Pits SPA. If numbers are significant, offsite mitigation will be required for loss of habitat. No modification required.</p>
<p>Representation reference: 105/1/19</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Additional residents will mean greater pressure on services including schools, doctors and dental surgeries etc. In particular, the local primary schools are Wootton, Caroline Chisholm and Preston Hedges, all of which are oversubscribed to the extent that applications are in some cases limited to those living within half a mile. Great Houghton's local primary school is in Little Houghton. This is a small village school (it currently has just under 100 pupils and is almost full) and would not have the necessary capacity for a development of this size. The development needs to be self-sustaining in this respect as existing resources are insufficient. This is a further drain on already scarce resources.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Policy 37 of the LPP2 requires major development proposals to contribute to the delivery of and where necessary provide land / suitable sites for new infrastructure associated with and resulting from the scheme. No</p>

			<p>Effective</p> <p>The third test of soundness concerns is the plan effective? This response has already demonstrated that the Local Plan Part 2 strategy is not deliverable over the plan period (see paragraphs 3 to 16 of this response).</p>		modification required.
<p>Representation reference: 105/1/20</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments:</p> <p>The Green housing land allocation would not enable sustainable development in accordance with the policies of the NPPF.</p> <p>Whilst The Green allocation would contribute to the national aim of increasing housing growth, this is unnecessary at this time, on an inappropriate site and comes with significant negative costs – many of which remain to be quantified. Paragraph 72 of the NPPF provides specific policy guidance for those seeking to identify large sites:</p> <p>“72. 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. Working with the support of their communities, and with other authorities if appropriate, strategic policy- making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:</p> <p>a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains; b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The proposed allocation at The Green, Great Houghton is located next to the large employment site of Brackmills. Existing public transport routes are located to the north and south of the site on the Bedford Road and the Newport Pagnell Road. Any proposal coming forward will need to adhere to Policy 37 of the LPP2 to ensure the relevant infrastructure is delivered in a timely manner to support housing. No modification required.</p>

			<p>c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;</p> <p>d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)³⁵; and</p> <p>e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.”</p> <p>The Green is not well located or well supported by necessary infrastructure or facilities (paragraph 72a). The Green is not included within existing or planned investment for infrastructure – it will bring an additional and competing claim on such resources.</p> <p>The Green will not be a sustainable community (paragraph 72b). It will be car dependent with poor access to services, especially for those without access to a private car and limited access to employment opportunities. Neither of these will be available on site. Policy 41 fails to identify how any needed infrastructure improvements will be funded or provided; this is not consistent with paragraph 34 of the NPPF:</p> <p>“34. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.”</p> <p>By failing to quantify these needs the allocation of The Green undermines the deliverability of the WNJCS and Local Plan Part</p>		
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			<p>2, we note our earlier points, and the Council's own position, that delivery on large sites is persistently under delivering.</p> <p>Policy 41 does set out a set a parameters for the quality of the development (paragraph 72c).</p> <p>Policy 41 does not make a realistic assessment of likely rates of delivery (paragraph 72d) nor does it set out any mechanism for how the site can be delivered.</p> <p>Paragraph 72d is not considered relevant.</p> <p>Paragraph 103 of the NPPF states:</p> <p>"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health."</p>		
<p>Representation reference: 105/1/21</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The Green allocation would be significant development and as has been shown elsewhere in this representation, development of this site is not sustainable: it does not limit the need to travel, there is no genuine choice of transport modes; as a result this will lead to increased congestion and have negative impacts on air quality and public health.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The proposed allocation at The Green, Great Houghton is located next to the large employment site of Brackmills. Existing public transport routes are located to the north and south of the site on the Bedford Road and the Newport Pagnell Road. Any proposal coming forward will need to adhere to Policy 37 of the LPP2 to ensure the relevant</p>

					infrastructure is delivered in a timely manner to support housing as well as other policies throughout the LPP2 which seek to improve air quality (such as Policy 32 (Designing Sustainable Transport and Travel) and Policy 35 (provision of facilities for electric vehicle charging points)). No modification required.
<p>Representation reference: 105/1/22</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: The allocation of land at The Green as has been shown in this representation is unnecessary and not sustainable. The Parish Council seeks the removal of this allocation from Local Plan Part 2. If the Borough Council should disagree with this position and proceed with the allocation, the Parish Council will seek the following changes to Local Plan Part 2: a) Allocation of the area shaded green in Figure 20 of Local Plan Part 2as a green wedge. This will ensure continued separation of the proposed new development from Great Houghton village. b) Quantification of the traffic impact on The High Street, Great Houghton and identification of specific mitigation measures to avoid or mitigate these impacts. c) Surveys should be undertaken before the land is allocated to identify whether the site is used by over-wintering Golden Plover / Lapwing</p>	<p>Suggested changes: If the Borough Council should disagree with this position and proceed with the allocation, the Parish Council will seek the following changes to Local Plan Part 2: a) Allocation of the area shaded green in Figure 20 of Local Plan Part 2 as a green wedge. This will ensure</p>	<p>Officer comments: The Council completed an extensive Land Availability Assessment exercise to ascertain whether the sites are suitable, developable and deliverable prior to allocating them for development, as required by Government guidelines. There are policies in the</p>

			<p>i.e. to be carried out in the winter. If significant numbers of Golden Plover or Lapwing are identified at the site, offsite mitigation required for the loss of habitat should be identified as part of the allocation.</p>	<p>continued separation of the proposed new development from Great Houghton village.</p> <p>b) Quantification of the traffic impact on The High Street, Great Houghton and identification of specific mitigation measures to avoid or mitigate these impacts.</p> <p>c) Surveys should be undertaken before the land is allocated 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, offsite mitigation required for the loss of habitat should be</p>	<p>Local Plan which are designed to ensure that the scheme, and all development schemes in Northampton, deliver sustainable transport and travel, and appropriate mitigation.</p> <p>The Council does not currently have evidence to justify a green wedge policy. The ecological enhancement will act as a buffer between the existing village and the new development. Details of what constitutes ecological enhancements will be considered at development management stage. No modification required.</p>
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				identified as part of the allocation.	
<p>Representation reference: 161/1/3</p> <p>Name: Sarah Williams</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: (A) Not positively prepared: The proposed Local Plan allocates more land than is required to achieve the projected need – it is not justified per the Council’s own data. Other smaller, more sustainable and deliverable sites are identified - the Green is a large development but no additional services (e.g. schools, doctors etc) are proposed, so stretched local services are likely to be overwhelmed. (B) Not justified or effective:</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The LPP2 plans for a supply of more dwellings than is required by the West Northamptonshire Joint Core Strategy. This is due to building in contingency for previous under-delivery on the large SUE sites in and around Northampton. Smaller sites are allocated, that will be able to come forward quicker, in case of continued SUE under-delivery. Policy 37 of the LPP2 requires major development proposals to contribute to the delivery of and where necessary provide land / suitable sites for new infrastructure associated with and resulting from the</p>

					scheme. No modification required.
<p>Representation reference: 161/1/4</p> <p>Name: Sarah Williams</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: As mentioned above the site is not needed to meet projections and there are alternatives, while the proposed development at the Green would have a serious detrimental impact on the village of Great Houghton as follows: Traffic Traffic produced by the proposed development would have a major impact on the village: At the A428 turn The A428 has a 60mph speed limit. There have been accidents, including fatalities, at the junction. The right turn (e.g. to go the local school/Post Office/church which are all in Little Houghton) is difficult and dangerous to make – you often have a significant wait. Although there are two lanes at the junction, the two-lane stretch is only a few car lengths long. Once a few cars are waiting to turn right, those wishing to turn left and head into Northampton cannot get past them to access the left-hand lane and a queue starts to form up through the village. Given that each car turning right has to wait to turn, the queue moves slowly Use of the route from is underestimated and has not been being properly quantified. It is the quickest route between Wootton and the A428 and in continuous use. When there is a blockage on the M1 or A45, the number of cars visibly increases and a queue already forms up into the village. The village has approximately 300 homes. The proposed development comprises 800 houses. Assuming 2 cars per household, the development would produce an additional 1,600 cars. This is likely to produce significant daily queues at the A428 turn, affecting quality of life for villagers and those living on the development. There is no way to widen the High Street, as there are houses on either side all the way down. It is also within the Conservation Area. I cannot therefore see how this could be</p>	<p>Suggested changes: The site should therefore not be allocated.</p>	<p>Officer comments: Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around acces to the site. Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme. Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport</p>

			effectively mitigated, but in any event, the proposed plan contains no actual assessment of the potential effect. The site should therefore not be allocated.		schemes and mitigation). No modification required.
<p>Representation reference: 161/1/5</p> <p>Name: Sarah Williams</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: On the Green The Green is single track with no street lighting. People speed and are unused to using passing places. Large potholes form each winter which need repair. The road does not stand up to its current user and would need to be significantly improved. However, as it is surrounded by fields, it is capable of improvement. The High Street and the turn onto the A428 are not.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around acces to the site. Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme. Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport</p>

					schemes and mitigation). No modification required.
<p>Representation reference: 161/1/6</p> <p>Name: Sarah Williams</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: Down Great Houghton High Street The High Street is single carriageway and has parked cars. At these points, the road effectively becomes a single-track with passing places. The High Street is a hill all the way down and drivers and cyclists speed. HGVs are currently a problem, given the width of the road. There is likely to be additional HGV traffic, especially associated with construction. If you need to walk from the top to the bottom of the village, you have to cross the road at least once as there is pavement on one side only in places at the top, middle and bottom of the village. This includes children using school buses from Little Houghton Primary School and Wollaston School and anyone using the Village Hopper bus (they all stop at the White Hart pub). More traffic means more risk to the safety of those crossing the road and other drivers. More exhaust emissions and environmental pollution (particularly if traffic is queuing) would lead to a loss of amenity and detrimental effect on the health and wellbeing of those living on or using the High Street. Additional rush hour traffic on the A428 and on the Newport Pagnell road Rush hour queues on the A428 into Northampton take an additional 20-30 minutes. If there is problem on the M1/A45, there is a solid line of cars going past the A428 turn and back towards Bedford and impeding exit from Great Houghton. The Queen Eleanor interchange is also busy. Additional traffic will make this worse.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Appendix C states that Transport Assessments will be required for development proposals. These may indicate the need for localised improvement works, particularly around acces to the site. Policy 37 requires major development proposals to contribute to infrastructure associated with and resulting from the scheme. Proposals that come forward for the site will also need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport</p>

					schemes and mitigation). No modification required.
<p>Representation reference: 161/1/7</p> <p>Name: Sarah Williams</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: National Cycle Route National Cycle Route 6 passes up the High Street from the disused railway line at the Glebe and then passes along the Green. It is well used, particularly during lockdown. There is currently greater emphasis on health and wellbeing and the benefits of exercise/an active lifestyle. More traffic would make it significantly less safe for cyclists.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Proposals that come forward for the site will need to be in conformity with Policies 32 (designing sustainable transport and travel), 33 (highway network and safety) and 34 (transport schemes and mitigation). No modification required.</p>
<p>Representation reference: 161/1/8</p> <p>Name: Sarah Williams</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p> <p>Plan is unsound: - not positively prepared - not justified</p>	<p>Comments: Loss of character and setting Great Houghton is a village which has grown piecemeal via smaller developments. The village includes a Conservation Area covering the High Street including that part which may be affected by queues. The effect on our village has not been adequately quantified but instead underestimated and glossed over. As well as the street scene (including within the Conservation Area) being affected, given the size of the development relative to the village and its proximity, the development will dwarf and potentially take over the village and so cause the village to lose its identity, not only from the development of houses but due</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Policy 41 of the LPP2 sets out that any proposed scheme will need to take into account the sensitivities and significance of the setting of Great Houghton and the Conservation Area. No modification required.</p>

		<ul style="list-style-type: none"> - not effective - not consistent with national policy 	<p>to the volume of traffic and the overall disturbance caused by that, leading to a loss of character and setting. It moves the line of development marking the end of Northampton across the line of the village and is a move towards encirclement/swallowing of the village.</p> <p>At the moment, you leave the village via the Green and once you pass Leys Lane (the entrance to the village hall and playing field), you are immediately in open countryside. This is part of the feel and setting of the village and this detachment is noted in our Conservation Area designation. If this development went ahead, that would be lost.</p>		
<p>Representation reference: 161/1/9</p> <p>Name: Sarah Williams</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness:</p> <p>Plan is not legally compliant:</p> <ul style="list-style-type: none"> - not in accordance with SCI - not consistent with regulatory requirements <p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified - not effective - not consistent with national policy 	<p>Comments:</p> <p>Pressure on local services Additional residents will mean greater need in terms of school places and with doctors and dental surgeries etc. My children attend Little Houghton Primary School which is a small village school with around 85 pupils and most years are almost full. It could not cope with the additional pupils from a development of this size and I know from looking at schools for my children that the schools in Wootton are significantly oversubscribed. The development needs to be self-sustaining in this respect as existing resources are insufficient and there is no mention of this. Smaller more sustainable developments would be more easily catered for whereas the size of this development means it would not.</p> <p>(C) not consistent with national planning policy</p> <p>It is a development of a significant size but does not have any employment opportunities within the development and lacks services and supporting infrastructure. Bus services are very limited and the development would create significant traffic queues at various points for both Great Houghton and those living in the development. It is not sustainable by itself and the proposed plan does not identify how any improvements needed will be funded.</p>	<p>Suggested changes: I therefore think the site should be removed from this allocation.</p>	<p>Officer comments: The proposed allocation at The Green, Great Houghton is located next to the large employment site of Brackmills. Existing public transport routes are located to the north and south of the site on the Bedford Road and the Newport Pagnell Road. Any proposal coming forward will need to adhere to Policy 37 of the LPP2 to ensure the relevant infrastructure is delivered in a timely</p>

			The development will not enhance the environment or wellbeing of those either living in Great Houghton or in the development itself.		manner to support housing. No modification required.
Representation reference: 162/1/3 Name: Peter Summerside	Refers to: Policy 41	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: This development should not proceed at all. Great Houghton village cannot cope with the 4,000 new vehicle movements per day that this development would generate.	Suggested changes: None.	Officer comments: Traffic modelling has been undertaken by Northamptonshire County Council on behalf of the Borough Council for this site to assess the potential traffic implications of the proposed development on the road network. Policy 32 requires that the transport impacts of new development are mitigated.
Representation reference: 162/1/4 Name: Peter Summerside	Refers to: Policy 41	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: The proposals would also spoil the pleasant countryside around the village, diminishing its character and destroying local wildlife habitats.	Suggested changes: None.	Officer comments: Any proposal that comes forward will need to comply with the relevant policies contained in the development plan and provide relevant mitigation measures. A buffer is being proposed between the development site and the existing

					village. An objective of the Local Plan is the provision of green infrastructure, which includes biodiversity net gain as a condition of development.
Representation reference: 162/1/5 Name: Peter Summerside	Refers to: Policy 41	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: If the scheme proceeds at all, far greater consideration should be given to : 1. Vehicle access improvements - the proposed development is on a single track road 2. Traffic calming in Great Houghton – particularly at the Southern end on The Green (which our property adjoins) – vehicles already thunder through here unhindered with no regard for the lives of pedestrians, pets or wildlife. 3. Protection of cyclists and pedestrians (cyclists use Great Houghton and its environs a lot). 4. Improved drainage and infrastructure – a lot of new homes will require significant infrastructure improvements. 5. Environmental and sound buffering between the development, Great Houghton village and Brackmills. 6. Air quality protection. 7. The conservation status of Great Houghton and its special characteristics which need protecting and preserving - it could easily be ruined and overrun by thoughtless mass housing development.	Suggested changes: None.	Officer comments: Noted and will be considered in greater detail at planning application stage if and when a proposal comes forward.
Representation reference: 162/1/6 Name: Peter Summerside	Refers to: Policy 41	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: I hope you will listen to our concerns and act to protect this locality. Too many places have been permanently wrecked in Northants by thoughtless development.	Suggested changes: None.	Officer comments: Noted.

<p>Representation reference: 169/1/5</p> <p>Name: William McFarland</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified</p>	<p>Comments: There is however no mention of Canada Geese who each year (particulary during August and September) use the northern part of this area (and the southern part of the Diocese land adjacent) for stopping en route on their travels. I trust this, along with your other bird surveys referred to, will reduce the offsite mitigation and protect their habitat.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Applicants proposing development on site LAA1098 will need to liaise with Natural England to determine the relevant surveys that will need to be undertaken, in order to mitigate any disutbance to species. No modification required.</p>
<p>Representation reference: 172/1/8</p> <p>Name: Homes England</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: Homes England are undertaking technical studies of their landholding at The Green, Great Houghton to support the submission of an outline planning application for residential development. Homes England support the principle of development coming forward at this site and welcome the site's allocation in the Submission Draft Local Plan Part 2 as a Housing Allocation; Site Policy 41 The Green, Great Houghton; and on the Policies Map.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 172/1/9</p> <p>Name: Homes England</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: Homes England's technical assessment of the site's capacity will include the determination of the extent and location of ecological enhancements needed to secure a net increase in biodiversity and include determination of the location of built development take into account and be sensitive to the significance and the setting of the Great Houghton conservation area and listed buildings there, as referenced in Paragraph 13.14.</p>	<p>Suggested changes: Homes England therefore requests the following changes to Policy 41 and the diagram shown in Figure 20 to make the Plan sound.</p>	<p>Officer comments: It is agreed that a proposed modification to the plan will clarify the policy. Make alterations to bullet point 1 in Policy 41. Add details on</p>

			<p>In advance of detailed technical assessment, the location and extent of ecological enhancement and the location of built development cannot be determined and specifying their location and extent restricts flexibility in taking the site forward. As such Homes England objects to the wording of Policy 41 as currently drafted and to the diagram shown in Figure 20.</p> <p>As currently drafted, the policy and diagram are too prescriptive and do not meet the test of soundness through inconsistency with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2019, Paragraph 11).</p>	<p>POLICY 41 THE GREEN, GREAT HOUGHTON (LAA1098) Housing development of [approximately] 800 dwellings, [subject to analysis of capacity], which comply with the development principles shown on Figure 20 will be supported, [following further technical assessment] and 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, [appropriate mitigation] will be required for the 	<p>buffer and need to avoid coalescence in the supporting text. No change to figure 20.</p>
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				<p>loss of habitat i.e. functionally linked land</p> <ul style="list-style-type: none">• 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 [indicative] area shaded green in the diagram [subject to the confirmation of this area's suitability for ecological enhancement and to act as a buffer.]	
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				<ul style="list-style-type: none">• The scheme 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• 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• A buffer is to be created, in the form of ecological	
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				<p>enhancements and net increase in biodiversity within the area of search shaded green in the diagram.</p> <p>Appropriate types of habitat and accessibility are to be determined following surveys for Special Protection Area birds</p> <ul style="list-style-type: none">• The development provides suitable transport links to neighbouring developments, including neighbourhood centres and community facilities• 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	
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				<p>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> <ul style="list-style-type: none">• Any proposal that comes forward should include suitable measures to mitigate the impact of additional traffic generated by the development• Any proposal should also include air quality and noise impact assessment from the Brackmills Industrial Estate• Any application on the site will need to be accompanied by an	
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				archaeological investigation that considers any archaeological potential on the site	
<p>Representation reference: 185/1/14</p> <p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: This policy has also been improved since the previous version of the Local Plan Part 2; however, it is still of concern as its potential link to the Upper Nene Valley Gravel Pits Special Protected Area (SPA) has not been established. The Habitats Regulations Assessment and Policy 41 requests 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. The area suggested for ecological enhancement within the proposal (Figure 20) 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. Policy 41 also lists a range of other issues to be considered within this allocation. We would strongly recommend that the over-wintering bird surveys are carried out as soon as possible so that the importance of the allocation (as functionally linked land) to the SPA and the mitigation/compensation which may be required are clearly established and used to reassess the suitability of the allocation.</p>	<p>Suggested changes: None</p>	<p>Officer comments: Surveys are expected to be undertaken by the applicant and will be advised to undertake surveys at the outset. No change.</p>
<p>Representation reference: 197/1/19</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments: 19. All Site Specific Policies within this chapter (and in particular Policy 41) will require substantial mitigation measures and supporting infrastructure to be provided, both for on-site and off-site measures.</p>	<p>Suggested changes: Each of the Site Specific Policies should therefore be amended to include specific reference to the importance of any scheme</p>	<p>Officer comments: All site specific policies will need to comply with other relevant generic development policies in the plan so it is not</p>

				complying with Policy 37 – Infrastructure to ensure sustainability and address any negative impacts of development of this scale.	considered necessary to list them, including Policy 37.
<p>Representation reference: 225/1/3</p> <p>Name: Anthony Smith</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements - not compliant with duty to cooperate</p> <p>Plan is unsound: - not positively prepared - not justified</p>	<p>Comments: The comments relate to the traffic impacts of site allocation LAA1098.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The Council has undertaken a robust land availability assessment. This assessment concludes that the development can be mitigated against and Policy 41 has been formulated to guide developers accordingly.</p>
<p>Representation reference: 225/1/4</p> <p>Name: Anthony Smith</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is not legally compliant: - not in accordance with SCI - not consistent with regulatory requirements</p>	<p>Comments: There has been no assessment of air quality impact within surrounding areas. Much is now known about the detrimental affects of pollution affecting the heart and lungs.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: Policy 6 of the LPP2 requires development to prevent negative impacts on residential amenity from poor air quality.</p>

		<ul style="list-style-type: none"> - not compliant with duty to cooperate <p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified 			
<p>Representation reference: 225/1/5</p> <p>Name: Anthony Smith</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Plan is not legally compliant:</p> <ul style="list-style-type: none"> - not in accordance with SCI - not consistent with regulatory requirements - not compliant with duty to cooperate <p>Plan is unsound:</p> <ul style="list-style-type: none"> - not positively prepared - not justified 	<p>Comments: There has been no assessment of safety linked to potential additional traffic movement through Gt Houghton.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: The Council has undertaken a robust land availability assessment, as well as undertook a traffic modelling exercises. These assessments conclude that the development can be mitigated against and Policy 41 has been formulated to guide developers accordingly.</p>
<p>Representation reference: 246/1/13</p> <p>Name: Natural England</p>	<p>Refers to: Policy 41</p>	<p>Legal compliance and soundness: Legal compliance:</p> <ul style="list-style-type: none"> - not specified <p>Plan is unsound:</p> <ul style="list-style-type: none"> - not effective - not consistent with national policy 	<p>Comments: 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.</p>	<p>Suggested changes: The Green, Great Houghton requires a detailed project level Habitats Regulations Assessment to address impacts to the Upper Nene</p>	<p>Officer comments: Natural England's response to the LPP2 Draft Submission Round 1 consultation dated 11.06.19 stated: Our previous advice on Water Supply &</p>

				<p>Valley Gravel Pits SPA.</p>	<p>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 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</p>
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					<p>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 Plan57, 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>
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Representation reference: 246/1/14 Name: Natural England	Refers to: Policy 41	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective - not consistent with national policy	Comments: 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. No details have been provided regarding where or how the off-site mitigation would be achieved.	Suggested changes: None specified.	Officer comments: Any applicant seeking to develop the site will need to provide details of any suitable off-site mitigation through the development management process. No modification required.
Representation reference: 169/1/3 Name: William McFarland	Refers to: Chapter 13	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified	Comments: We welcome your proposal for Ecological Enhancement of the area shown in Figure 20 and would emphasise its importance to prevent pressures and disturbance to the birds referred to in Policy 41.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 172/1/23 Name: Homes England	Refers to: Chapter 13	Legal compliance and soundness: Plan is legally compliant. Soundness: - not specified	Comments: FIGURE 20 - DEVELOPMENT PRINCIPLES FOR LAND AT THE GREEN, GREAT HOUGHTON ‘Ecological enhancement’ should be changed to read ‘ecological enhancement (indicative)’	Suggested changes: FIGURE 20 - DEVELOPMENT PRINCIPLES FOR LAND AT THE GREEN, GREAT HOUGHTON ‘Ecological enhancement’ should be changed to read ‘ecological enhancement (indicative)’	Officer comments: No modification required - There is a need to ensure that there is a buffer between the existing village and the new development area. Add to the preamble text in para 13.12.
Representation reference: 35/2/11	Refers to: Policy 42	Legal compliance and soundness:	Comments: Sound. The policy amendments following the HIA are welcomed.	Suggested changes: None.	Officer comments: Noted.

Name: Historic England		Plan is legally compliant. Plan is sound.			
Representation reference: 53/1/18 Name: Anglian Water Services Limited	Refers to: Policy 42	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Policy 42 Greyfriars - SUPPORT We welcome the reference made to maximising the use of Sustainable Drainage Systems on site subject to a detailed assessment being prepared. Similarly we welcome the reference made to considering the location of the existing water mains and sewers as part of the site layout to ensure access can be maintained following construction.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 75/1/13 Name: Town Centre Conservation Area Advisory Committee	Refers to: Policy 42	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective - not consistent with national policy	Comments: The Holy Sepulchre Conservation Area and Church have been badly affected by road schemes which have isolated them from the town centre. Any development plan for Greyfriars must address this.	Suggested changes: Add a bullet point: "Ensure that the Holy Sepulchre Conservation Area, Church and churchyard are reintegrated back into the town centre and their historic character is enhanced and protected". - In accordance with the NPPF paragraph 200, add a bullet point "Enhance the setting of the Holy Sepulchre Conservation Area,	Officer comments: Northampton Forward has produced a Town Centre Masterplan covering the town centre and the main gateway route into the town centre from the West. Policies 8 and 9 of the LPP2 set the context for the proposals across the town centre and the wider Central Area, including the Holy Sepulchre CA and church. No modification required.

				and the Holy Sepulchre Church. We also believe that the wider context must be taken into account when designing an appropriately integrated development. We therefore recommend that a Masterplan be developed for the wider area between the Grosvenor Centre, the Mounts, Regents Square, Broad St / Horse Market and Greyfriars.	
<p>Representation reference: 197/1/20</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 42</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments: 19. All Site Specific Policies within this chapter (and in particular Policy 41) will require substantial mitigation measures and supporting infrastructure to be provided, both for on-site and off-site measures.</p>	<p>Suggested changes: Each of the Site Specific Policies should therefore be amended to include specific reference to the importance of any scheme complying with Policy 37 – Infrastructure to ensure sustainability and address any</p>	<p>Officer comments: All site specific policies will need to comply with other relevant generic development policies in the plan so it is not considered necessary to list them, including Policy 37.</p>

				negative impacts of development of this scale.	
Representation reference: 248/1/19 Name: Welland Valley Rail	Refers to: para. 13.18	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective	Comments: The explanatory text at para 13.18 mentions the safeguarded former alignment, but this is not mentioned in the policy itself.	Suggested changes: None specified.	Officer comments: The railway line is outside of the boundary of the allocated site (LAA1139). No modification required.
Representation reference: 35/1/12 Name: Historic England	Refers to: Policy 43	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not effective - not consistent with national policy	Comments: Whilst the reduction in size of the allocation is welcomed, objections remain to the policy as proposed.	Suggested changes: The words 'at least' must be deleted from the first sentence and replaced with 'up to' to ensure clarity and that heritage assets are conserved and enhanced.	Officer comments: Restricting the number of dwellings on this brownfield site can have an impact on the potential of the site to deliver Northampton's local housing needs. The quantum of development proposed will still need to take into consideration all matters associated with the preservation and enhancement of heritage assets. Following updated evidence presented by Homes England a minor modification to the plan is

					<p>proposed such that the words "at least 200 dwellings" will be replaced with "up to 500 dwellings".</p> <p>No modification required.</p>
<p>Representation reference: 35/1/13</p> <p>Name: Historic England</p>	<p>Refers to: Policy 43</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective - not consistent with national policy</p>	<p>Comments: First policy criteria: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". This does not accord exactly with the wording in Policy 41 of the HIA (page 105) which states that proposals should 'Be two to four storeys in height, with taller buildings facing along the principal movement routes and the northern section of the site.' It appears that the intention of the HIA was to restrict the height of buildings on the site to 4 storeys max, with those 4-storey buildings being further away from sensitive heritage assets. The Local Plan Policy implies there are opportunities for buildings taller than 4 storeys on the site. Historic England would object due to the impact that would have on the nearby very sensitive heritage assets such as the Battlefield, Delapre Abbey, the Abbey parkland and Conservation Area.</p>	<p>Suggested changes: As such policy criteria bullet point one should be reworded for clarity to read:- "Generally be two to A MAXIMUM OF four storeys in height, with opportunities for THE taller building facing along the principal movement routes and the northern section of the site."</p>	<p>Officer comments: It is agreed that Policy 43 needs clarifying. It is recommended that the policy be modified to comply with the statement contained in the Heritage Impact Assessment, to read: "Be two to four storeys in height, with taller buildings facing along the principal movement routes and the northern section of the site"</p>
<p>Representation reference: 35/1/14</p> <p>Name: Historic England</p>	<p>Refers to: Policy 43</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>Comments: The removal of the portion of the Registered Battlefield from the allocation is welcomed by Historic England. Although the remainder of the site is undesignated and has been subject to industrial uses in the 19th and 20th centuries it retains the potential to yield archaeological information relevant to the Registered Battlefield. This is recognised in the HIA, which</p>	<p>Suggested changes: Add another policy criteria to state:- "Prior to development of the site, further archaeological</p>	<p>Officer comments: It is agreed that this additional criteria would strengthen the policy. It is recommended that the policy be</p>

		- not consistent with national policy	<p>highlights the potential for battlefield archaeology to be present including encampments, along with remains of the medieval church that would have formed a component of the wider battlefield.</p> <p>We have previously advised that archaeological assessment through geophysical survey, metal detecting and excavation should be a pre-cursor to allocation, to create a sufficiently robust evidence base to ensure any proposed allocation is deliverable in accordance with national and local policies.</p> <p>As the allocation will be in advance of archaeological assessment of the site, the policy should require assessments to be carried out at an early stage to provide fuller understanding of the sensitivities of the site and inform the design process. We advocate that the allocation should have sufficient flexibility to enable areas of significant archaeological remains to be protected within areas of the development's green space'.</p>	assessment will be required to inform development and layout of the site"	modified through an additional criteria to read: "Prior to development of the site, further archaeological assessment will be required to inform development and layout of the site"
<p>Representation reference: 53/1/19</p> <p>Name: Anglian Water Services Limited</p>	<p>Refers to: Policy 43</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: We welcome the reference made to maximising the use of Sustainable Drainage Systems on site subject to a detailed assessment being prepared.</p> <p>Similarly we welcome the reference made to considering the location of the existing water mains and sewers as part of the site layout to ensure access can be maintained following construction.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 172/1/10</p> <p>Name: Homes England</p>	<p>Refers to: Policy 43</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: Homes England are engaged with a developer to take forward our landholding at Ransome Road and support the principle of development coming forward at this site and welcome the site's allocation in the Submission Draft Local Plan Part 2 as a Housing Allocation; Site Policy 43 Ransome Road; and on the Policies Map.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>

<p>Representation reference: 172/1/11</p> <p>Name: Homes England</p>	<p>Refers to: Policy 43</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: Homes England's current engagement with its development partner involves a technical assessment of the site's capacity including determination of the extent of remediation needed to address the contamination referred to in Paragraph 13.19 of the Draft Plan and maximise the site's capacity. The work undertaken so far indicates that the site has an indicative site capacity of approximately 500 homes. As currently drafted, the policy and diagram are too prescriptive and do not meet the test of soundness by failing to plan positively by artificially limiting the site's capacity and its ability to contribute to meeting the area's objectively assessed needs. The policy and diagram are inconsistent with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2019, Paragraph 11).</p>	<p>Suggested changes: Homes England therefore requests the following changes to Policy 43 and the diagram shown in Figure 22 to make the Plan sound. POLICY 43 RANSOME ROAD (LAA1139) Ransome Road will be developed for [approximately 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:</p> <ul style="list-style-type: none"> • 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>Officer comments: The Council considers that the policy reference to "at least" will allow the developer to consider a higher quantum. There is no need to change the policy. No modification required.</p>
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				<ul style="list-style-type: none">• 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• 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• Any development should not compromise the integrity of the	
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				<p>habitat to the north- east of the site</p> <ul style="list-style-type: none">• 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 <p>The layout of any development should be designed to take into account existing sewers and water mains within the site.</p> <p>Subject to detailed assessment (including an assessment of contaminated land), development on this site should maximise the use of Sustainable Drainage Systems</p>	
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				<p>(SuDS) to reduce the rate of surface water run-off. Any proposal should also aim to contribute to improving water quality in the area. Any development will be expected to contribute to provision of woodland and wet grass stepping stones (connected habitats). 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</p>	
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				protect against pluvial flooding.	
Representation reference: 172/1/24 Name: Homes England	Refers to: Policy 43	Legal compliance and soundness: Plan is legally compliant. Soundness: - not specified	Comments: FIGURE 22 - DEVELOPMENT PRINCIPLES FOR RANSOME ROAD 'Green corridor' should be changed to read 'Green space (indicative)'	Suggested changes: FIGURE 22 - DEVELOPMENT PRINCIPLES FOR RANSOME ROAD 'Green corridor' should be changed to read 'Green space (indicative)'	Officer comments: It is agreed that a proposed modification to the plan will clarify the policy position of the figure. Modify wording on key of fig 22 from 'Green corridor' to 'Green space (indicative)'
Representation reference: 248/1/20 Name: Welland Valley Rail	Refers to: Policy 43	Legal compliance and soundness: Legal compliance: - not specified Plan is unsound: - not effective	Comments: Enhance policy 43 to include: "Any development should not compromise the ability to provision light or heavy rail transport links along or near to the former railway alignments to the north of the site."	Suggested changes: Enhance policy 43 to include: "Any development should not compromise the ability to provision light or heavy rail transport links along or near to the former railway alignments to the north of the site."	Officer comments: This is not considered necessary. The railway is outside of the area in question.
Representation reference: 35/1/15 Name: Historic England	Refers to: Policy 44	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: Sound. The additional policy is welcomed following the HIA.	Suggested changes: None.	Officer comments: Noted.
Representation reference: 53/1/20	Refers to: Policy 44	Legal compliance and soundness:	Comments: Policy 44 Site in Tanner Street, Green Street, St Peter's Way and Freeschool street -OBJECT (in part) - EFFECTIVE	Suggested changes: Add new criterion to Policy 44:	Officer comments: It is agreed that a proposed

<p>Name: Anglian Water Services Limited</p>		<p>Plan is legally compliant.</p> <p>Plan is unsound: - not effective</p>	<p>To ensure the policy is effective we would ask that reference be made to the requirement to maximise the use of SuDs on site subject to a detailed assessment which appears in the other allocation site policies in the Part 2 Local Plan.</p>	<p>'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>modification to Policy 44 will strengthen it. Modify the plan to add a new criterion to Policy 44: '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>Representation reference: 197/1/22</p> <p>Name: Northamptonshire County Council</p>	<p>Refers to: Policy 44</p>	<p>Legal compliance and soundness: Legal compliance: - not specified</p> <p>Soundness: - not specified</p>	<p>Comments: 19. All Site Specific Policies within this chapter (and in particular Policy 41) will require substantial mitigation measures and supporting infrastructure to be provided, both for on-site and off-site measures.</p>	<p>Suggested changes: Each of the Site Specific Policies should therefore be amended to include specific reference to the importance of any scheme complying with Policy 37 – Infrastructure to ensure sustainability and address any negative impacts of development of this scale.</p>	<p>Officer comments: All site specific policies will need to comply with other relevant generic development policies in the plan so it is not considered necessary to list them, including Policy 37.</p>
<p>Representation reference: 172/1/7</p>	<p>Refers to: Chapter 14</p>	<p>Legal compliance and soundness:</p>	<p>Comments:</p>	<p>Suggested changes:</p>	<p>Officer comments:</p>

<p>Name: Homes England</p>		<p>Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>As currently drafted the policy and supporting table refer to proposal offsetting loss of biodiversity. 'Offsetting' implies an offsite solution, yet it is often possible to deliver net gain on the same site.</p> <p>As such, the policy and supporting table in the plan do not meet the test of soundness through inconsistency with national policy which requires plans planning policies and decisions to contribute to and enhance the natural and local environment including by minimising impacts on and providing net gains for biodiversity (NPPF, 2019 Paragraph 170d).</p>	<p>The policy and table should be reworded as follows: POLICY 29 SUPPORTING AND ENHANCING BIODIVERSITY 1. The Council will require all major development proposals [to 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</p>	<p>It is agreed that a proposed modification to the plan will clarify the policy. Modify Policy 29 to remove 'offset the loss and': The Council will require all major development proposals to 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</p>
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				<p>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>Table 12: Indicator: Biodiversity net gain Target: [Major developments must secure a net gain in biodiversity] Main Policy delivered: 29</p>	<p>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>Amend Table 12 to include wording in brackets: Indicator: Biodiversity net gain Target: Major developments must secure a net gain in biodiversity Main Policy delivered: 29</p>
<p>Representation reference: 185/1/15</p> <p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>	<p>Refers to: Chapter 14</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: We are pleased to see that Biodiversity Net Gain is included as one of the monitoring indicators within the Green Infrastructure objective. The indicator suggests that only major developments are included in this monitoring. The National Planning Policy Framework paragraphs 170 and 174 already require all development to show how they can provide a net gain in biodiversity. This will also be included in the Environment Bill when it proceeds through Parliament.</p>	<p>Suggested changes: We would, therefore, suggest that the indicator looks at a range of developments to see how they are performing against this objective. It</p>	<p>Officer comments: Policy 29 requires all major development to secure a net gain in biodiversity therefore the monitoring indicator reflects that</p>

				would also be useful to monitor both the plans made at the application stage and their success within the developments post construction.	requirement. No change.
<p>Representation reference: 185/1/16</p> <p>Name: Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire</p>	<p>Refers to: Objective 10</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is sound.</p>	<p>Comments: We are pleased to see that Biodiversity Net Gain is included as one of the monitoring indicators within the Green Infrastructure objective. The indicator suggests that only major developments are included in this monitoring. The National Planning Policy Framework paragraphs 170 and 174 already require all development to show how they can provide a net gain in biodiversity. This will also be included in the Environment Bill when it proceeds through Parliament.</p>	<p>Suggested changes: We would, therefore, suggest that the indicator looks at a range of developments to see how they are performing against this objective. It would also be useful to monitor both the plans made at the application stage and their success within the developments post construction.</p>	<p>Officer comments: Policy 29 requires all major development to secure a net gain in biodiversity therefore the monitoring indicator reflects that requirement. No change.</p>
<p>Representation reference: 172/1/25</p> <p>Name: Homes England</p>	<p>Refers to: Glossary</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: The test of soundness requires plans to be consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF. Paragraph 129 of the NPPF makes reference to Building for Life. This design tool has now been updated to Building for a Healthy Life.</p>	<p>Suggested changes: Include in the Glossary: Building for a Healthy Life (BHL) Building for a Healthy Life is a Design Code to help people improve the</p>	<p>Officer comments: It is agreed that a proposed modification to the plan will clarify the policy. Modify the plan to include the following in the Glossary:</p>

			<p>https://www.udg.org.uk/publications/othermanuals/building-healthy-life</p> <p>The design tool is now in use by Homes England as referenced in our comments on Policy 3 Design and the updated design tool should be referenced in the Glossary.</p>	<p>design of new and growing neighbourhoods. BHL updates England's most widely known and most widely used design tool for creating places that are better for people and nature. The original 12 point structure and underlying principles within Building for Life 12 are at the heart of BHL.</p> <p>The new name reflects changes in legislation as well as refinements made to the 12 considerations in response to good practice and user feedback. It also recognises that this latest edition has been written in partnership with Homes England, NHS England and NHS Improvement. BHL integrates the</p>	<p>Building for a Healthy Life (BHL) Building for a Healthy Life is a Design Code to help people improve the design of new and growing neighbourhoods. BHL updates England's most widely known and most widely used design tool for creating places that are better for people and nature. The original 12 point structure and underlying principles within Building for Life 12 are at the heart of BHL.</p> <p>The new name reflects changes in legislation as well as refinements made to the 12 considerations in response to good practice and user feedback. It also recognises that this latest edition has</p>
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				findings of the three-year Healthy New Towns Programme led by NHS England and NHS Improvement.	been written in partnership with Homes England, NHS England and NHS Improvement. BHL integrates the findings of the three-year Healthy New Towns Programme led by NHS England and NHS Improvement.
<p>Representation reference: 105/1/8</p> <p>Name: Great Houghton Parish Council</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not positively prepared - not justified - not effective - not consistent with national policy</p>	<p>Comments: On a practical level it is argued that The Green, with the timescales involved, and the need for infrastructure resources will not be in a position to enhance delivery. Indeed, it will increase the target and fail to deliver. Appendix A, page 179 of Local Plan Part 2 assumes The Green will deliver 800 news units 2018/19 to 2028/29. This is not achievable. We are already in the second of those years (by which time, the Council assumes 50 units completed) and there is no prospect of a start on site in the medium term. Allocating land at The Green will not solve the under-delivery against target in Northampton. Indeed, it will make things worse by adding additional competition to the existing pool of large sites for infrastructure and other resources. The Council should address the under-delivery issue by concentrating resources on delivering the existing SUEs and facilitating the development of smaller sites. Not justified As set out above the Parish Council do not consider Local Plan Part 2 is putting forward “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (NPPF, paragraph 35). The continued over-reliance on a further larger site (The Green) and the existence, within Local Plan Part 2 itself, of</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The West Northamptonshire Joint Planning Unit produces a Joint Monitoring Report which considers the rate of house building in Northampton. The NPPF (para 75) states that authorities should prepare an action plan in line with national planning guidance, to assess the causes of underdelivery and identify actions to increase delivery in future years. It has been identified that large,</p>

			<p>sufficient smaller sites to increase supply, if not delivery, is a reasonable alternative.</p> <p>In addition, development of The Green is not justified for the following detailed reasons.</p>		<p>allocated sites are taking longer to build out and as such the LPP2 allocates smaller sites to rectify the historic underdelivery of homes.</p> <p>Policy 37 of the LPP2 requires development proposals to contribute towards new infrastructure associated with and resulting from the scheme.</p> <p>No modification required.</p>
<p>Representation reference: 172/1/26</p> <p>Name: Homes England</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: Homes England welcomes the inclusion of the following sites in Appendix A Trajectory for sites allocated in the Local Plan Part 2.</p> <p>Ref 0174 Ransome Road Gateway Ref; 1097 Gate Lodge; Ref 1098 The Green, Great Houghton Ref 1099 Upton Reserve Site; Ref 1139 Merge Homes England plots in Ransome Road.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 172/1/27</p> <p>Name: Homes England</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: As currently drafted, for a number of these sites, Appendix A is too prescriptive, and does not meet the test of soundness through inconsistency with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2019, Paragraph 11).</p>	<p>Suggested changes: For the site at Ransome Road; Ref 1139 modifications should be in line with the comments we have made on Policies 13 and 43</p>	<p>Officer comments: Policy 43 reference to "at least" 200 dwellings mean that a higher capacity can be considered. There is no need to change the</p>

				with regard to the Indicative Dwelling Capacity of this site.	indicative dwelling capacity for the site.
<p>Representation reference: 172/1/28</p> <p>Name: Homes England</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: The trajectory for the site at The Green, Great Houghton Ref 1098 should be modified in line with the comments made on Policy 41 with regard to the first year of completions; recognising that further technical work and capacity work is to be completed; this 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 two years then up to 100 dwellings completed per annum with two sales outlets.</p>	<p>Suggested changes: The trajectory for the site at The Green, Great Houghton Ref 1098 should be modified in line with the comments made on Policy 41 with regard to the first year of completions; recognising that further technical work and capacity work is to be completed; this 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 two years then up to 100 dwellings completed per annum with two sales outlets.</p>	<p>Officer comments: It is agreed that a proposed modification to the plan to include an updated trajectory.</p> <p>Modify trajectory for site LAA1098 The Green, Great Houghton recognising that further technical work and capacity work is to be completed; this 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 two years then up to 100 dwellings completed per annum with two sales outlets.</p>

<p>Representation reference: 172/1/29</p> <p>Name: Homes England</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: The trajectories for the sites at Gate Lodge Ref 1097 and Upton Reserve Site Ref 1099 should be modified with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first completions on both sites should be moved to 2022/23.</p>	<p>Suggested changes: The trajectories for the sites at Gate Lodge Ref 1097 and Upton Reserve Site Ref 1099 should be modified with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first completions on both sites should be moved to 2022/23.</p>	<p>Officer comments: It is agreed that a proposed modification to the plan will update the trajectory. Modify trajectory for site LAA1097 with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first completions on both sites should be moved to 2022/23.</p>
<p>Representation reference: 172/1/30</p> <p>Name: Homes England</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: The trajectories for the sites at Gate Lodge Ref 1097 and Upton Reserve Site Ref 1099 should be modified with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first completions on both sites should be moved to 2022/23.</p>	<p>Suggested changes: The trajectories for the sites at Gate Lodge Ref 1097 and Upton Reserve Site Ref 1099 should be modified with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first</p>	<p>Officer comments: It is agreed that a proposed modification to the plan will update the trajectory. Modify trajectory for site LAA1099 with regard to the first year of completions; recognising that the sites will need to secure outlie planning consent and be disposed of, the expected first</p>

				completions on both sites should be moved to 2022/23.	completions on both sites should be moved to 2022/23.
<p>Representation reference: 232/1/13</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: The current housing trajectory for site 0168 at Appendix A to the Plan, which assumes housing completions taking place from 2019-20, is not deliverable. Not only does this site not benefit from a planning permission for its development (in common with sites 1009 and 1142), but it also relies upon the delivery of the NSSUE for its access and utility servicing (again, as for sites 1009 and 1142).</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The respondent commented that this site should be combined with sites 1009 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>
<p>Representation reference: 232/1/14</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council's proposed addition of 361 dwellings can be delivered during the second five years of the Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this large development that offers scope for several concurrent sales outlets alongside affordable housing provision.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The respondent commented that this site should be combined with sites 1009 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended</p>

					combined sites and updated trajectory.
<p>Representation reference: 232/1/15</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council's proposed addition of 361 dwellings can be delivered during the second five years of the Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this large development that offers scope for several concurrent sales outlets alongside affordable housing provision.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The respondent commented that this site should be combined with sites 0168 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>
<p>Representation reference: 232/1/16</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council's proposed addition of 361 dwellings can be delivered during the second five years of the Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this large development that offers scope for several concurrent sales outlets alongside affordable housing provision.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The respondent commented that this site should be combined with sites 0168 and 1009, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>

<p>Representation reference: 232/1/20</p> <p>Name: Vistry Latimer Collingtree LLP</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p>Suggested changes: Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.</p>	<p>Officer comments: The respondent commented that these sites should be combined and a revised trajectory provided. This recommendation is considered acceptable. Modify Policies 13 and 38 and the Policies Map to reflect the recommended combined sites.</p>
<p>Representation reference: 233/1/13</p> <p>Name: Lagan Homes</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: The current housing trajectory for site 0168 at Appendix A to the Plan, which assumes housing completions taking place from 2019-20, is not deliverable. Not only does this site not benefit from a planning permission for its development (in common with sites 1009 and 1142), but it also relies upon the delivery of the NSSUE for its access and utility servicing (again, as for sites 1009 and 1142).</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The respondent commented that this site should be combined with sites 1009 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>
<p>Representation reference: 233/1/14</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p>	<p>Comments: An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council’s proposed addition of 361 dwellings can be delivered during the second five years of the</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The respondent commented that this site should be</p>

<p>Name: Lagan Homes</p>		<p>Plan is unsound: - not justified - not effective</p>	<p>Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this large development that offers scope for several concurrent sales outlets alongside affordable housing provision.</p>		<p>combined with sites 1009 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>
<p>Representation reference: 233/1/15</p> <p>Name: Lagan Homes</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound: - not justified - not effective</p>	<p>Comments: An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council's proposed addition of 361 dwellings can be delivered during the second five years of the Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this large development that offers scope for several concurrent sales outlets alongside affordable housing provision.</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The respondent commented that this site should be combined with sites 0168 and 1142, and a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.</p>
<p>Representation reference: 233/1/16</p> <p>Name: Lagan Homes</p>	<p>Refers to: Appendix A</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Plan is unsound:</p>	<p>Comments: An integrated housing trajectory for the enlarged NSSUE, demonstrating how the Council's proposed addition of 361 dwellings can be delivered during the second five years of the Plan period (between 2024/5 and 2028/9) without requiring annual completion rates to rise to undeliverable levels over this</p>	<p>Suggested changes: None specified.</p>	<p>Officer comments: The respondent commented that this site should be combined with sites 0168 and 1009, and</p>

		- not justified - not effective	large development that offers scope for several concurrent sales outlets alongside affordable housing provision.		a revised trajectory provided. This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the recommended combined sites and updated trajectory.
Representation reference: 233/1/20 Name: Lagan Homes	Refers to: Appendix A	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: The replacement of sites 0168, 1009 and 1142 by a single allocation for 336 dwellings therefore renders this element of the Plan “justified” (appropriate), while the accommodation of the ‘excess’ 25 dwellings within the NSSUE itself (near its local centre and primary school) renders the Plan both “justified” (appropriate) and “effective” (deliverable), with the replacement integrated housing trajectory for the NSSUE and its westerly extension presented at Appendix 2 to this representation rendering the Plan “effective” (deliverable). Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	Suggested changes: Policies 13 and 38, the Policies Map and Appendix A to the Plan should be altered accordingly.	Officer comments: This recommendation is considered acceptable. Modify the plan and the Policies Map to reflect the combined sites 0168, 1009 and 1142.
Representation reference: 247/1/11 Name: Bellway Homes	Refers to: Appendix A	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: It is clear that the site will make a meaningful contribution to the Council’s five-year housing land supply. Bellway Homes broadly supports the Council’s proposed housing trajectory; a delivery rate of 25 dwellings per annum is considered to be conservative but a sensible point to work forwards from.	Suggested changes: Noted.	Officer comments: Welcomed.
Representation reference: 23/1/6 Name:	Refers to: Appendix C	Legal compliance and soundness: Plan is legally compliant.	Comments: Within Appendix C (Infrastructure Requirements) of the submission Local Plan, the following statement is made:	Suggested changes: The above reference to highways contributions from	Officer comments: There is a live application on this site.

University of Northampton		<p>Plan is unsound:</p> <ul style="list-style-type: none"> - not justified - not effective - not consistent with national policy 	<p>'Overall the results to 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.</p> <p>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.</p> <p>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.</p> <ol style="list-style-type: none"> 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: <ul style="list-style-type: none"> • 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. 	<p>Avenue Campus should therefore be removed from the Plan.</p> <p>The proposed amendment is required in order to ensure that the plan is justified and effective in line with the NPPF and guidance in the PPG.</p>	
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			<p>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).’</p> <p>We have highlighted in bold the area of our concern. There was no reference in the previous submission version to the requirement for such a contribution and there have been no discussions with the University in respect of this.</p> <p>As highlighted above, an application for residential redevelopment of Avenue Campus (Ref N/2016/0810) is currently with the Council for determination. In relation to this application, the University’s consultant, Jacobs, has reviewed the capacity results for the relevant junctions and concluded that due to the negligible changes (a small increase of 2 additional vehicles in the AM peak and 5 fewer queueing vehicles in the PM peak) there is no justification for mitigation measures. Jacob’s revised Transport Assessment January 2019 is enclosed for information (further responses to comments from Northamptonshire Highways can also be provided if required although these have already been submitted to NBC).</p> <p>No justification has been given for seeking this contribution and as set out above it is not considered that it is necessary. The wording of Appendix C is therefore not justified and is contrary to paragraph 35 of the NPPF.</p> <p>The above reference to highways contributions from Avenue Campus should therefore be removed from the Plan.</p> <p>The proposed amendment is required in order to ensure that the plan is justified and effective in line with the NPPF and guidance in the PPG.</p>		
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<p>Representation reference: 172/1/31</p> <p>Name: Homes England</p>	<p>Refers to: Appendix C</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: As stated in our comments on Policy 41, Homes England are undertaking technical studies of their landholding at The Green, Great Houghton to support the submission of an outline planning application for residential development.</p> <p>Homes England note the reference in Appendix C Northampton Infrastructure Requirements and that traffic modelling and analysis by the County Council in 2020 has identified highway infrastructure improvements needed to accommodate the cumulative scale of growth proposed and that developer contributions will be sought towards their implementation.</p>	<p>Suggested changes: None.</p>	<p>Officer comments: Noted.</p>
<p>Representation reference: 172/1/32</p> <p>Name: Homes England</p>	<p>Refers to: Appendix C</p>	<p>Legal compliance and soundness: Plan is legally compliant.</p> <p>Soundness: - not specified</p>	<p>Comments: Homes England also note that to accommodate development at The Green, Great Houghton, highway infrastructure improvements will be needed to Bedford Road and Newport Pagnell Road.</p> <p>In advance of detailed technical work and capacity analysis, and before Transport Assessments and Statements are prepared, Homes England's position is that the requirements as set out in Appendix C are over prescriptive; and do not meet the test of soundness by failing to plan positively by potentially artificially limiting the site's capacity and their ability to contribute to meeting the area's objectively assessed needs. Appendix C policy is inconsistent with national policy which requires plans to positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (NPPF 2019, Paragraph 11).</p>	<p>Suggested changes: In order to achieve a more flexible approach, the wording in Annex C should be revised to read as follows: To accommodate development at The Green, Great Houghton (site LAA1098) the following is required: * [Upgrading] of The Green * [Upgrading] of the eastern Bedford Road approach to the Barnes Meadow roundabout, [potentially</p>	<p>Officer comments: No modification recommended - these are recommendations from Northamptonshire County Council.</p>

				including widening] of the river bridge. Highways England should be consulted on any works impacting the A45.	
Representation reference: 230/1/8 Name: Moulton Parish Council	Refers to: Appendix C	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not effective	Comments: No mention of Northern Orbital Route. This should be cross-referenced to 11.5.	Suggested changes: None.	Officer comments: The Northern Orbital Route is not referenced in Appendix C as there is no approved scheme yet.
Representation reference: 113/1/23 Name: East Hunsbury Parish Council	Refers to: Appendix G	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective	Comments: It is noted that there is provision at Appendix G for two primary schools local to East Hunsbury. E5 of which we are aware and forms part of the Northampton South SUE development. Ref E41 refers to a 3-form primary school at Collingtree, of which we have no knowledge. Northampton Borough Council have confirmed that this school was an additional school, approved as a result of an application made by an academy trust directly to the ESFA in 2017/18, and submitted on the basis of anticipated wider growth requirements of the area. The County Council has received confirmation that the scheme has been withdrawn from ESFA's programme. Therefore we would expect to see this school removed from the Appendix.	Suggested changes: Noted.	Officer comments: Agreed. Modify and update Appendix G to remove E41 scheme.
Representation reference: 197/1/23 Name:	Refers to: Appendix G	Legal compliance and soundness: Legal compliance: - not specified	Comments: Appendix G – Primary Education 20. The County Council has reviewed the list of Primary Education projects included at Appendix G. It should be noted that project ref E41 – ‘New three-form entry Primary School in	Suggested changes: Appendix G – Primary Education 20. The County Council has	Officer comments: Modify Appendix G to take into account the updated position.

Northamptonshire County Council		Soundness: - not specified	Collingtree (Wave 11 Free School: Approved)' is not currently expected to come forward at this time, having been withdrawn from the ESFA's free school delivery programme. It is recommended that this project be deleted from this schedule.	reviewed the list of Primary Education projects included at Appendix G. It should be noted that project ref E41 – 'New three-form entry Primary School in Collingtree (Wave 11 Free School: Approved)' is not currently expected to come forward at this time, having been withdrawn from the ESFA's free school delivery programme. It is recommended that this project be deleted from this schedule.	
Representation reference: 230/1/10 Name: Moulton Parish Council	Refers to: Appendix G	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not positively prepared - not effective	Comments: E10 mentions "another local school". What are the possible options? The nearest is presumably Moulton Primary, which is arguably not viable bearing in mind the already poor vehicle access?	Suggested changes: None.	Officer comments: Appendix G, Ref E10 references 'half a form entry to another local school'. The local school has not yet been determined (take from IDP 2019).
Representation reference: 230/1/11	Refers to: Appendix H	Legal compliance and soundness:	Comments: E39 – mention of proposed school is vague, bearing in mind that proposals have already been made for NSB-supported	Suggested changes: None.	Officer comments: It is expected that the Northampton

Name: Moulton Parish Council		Plan is legally compliant. Plan is unsound: - not positively prepared - not effective	school on land adjacent to old A43 south of Moulton. Are these proposals one and the same? Why is the specific "NSB school" and location not mentioned?		School for Boys scheme could fulfill the requirement in this area. However, it does not have planning permission yet. As such other provision may be needed in this area.
Representation reference: 201/1/18 Name: Persimmon Homes	Refers to: The Plan and policies map	Legal compliance and soundness: Plan is legally compliant. Plan is unsound: - not justified - not effective - not consistent with national policy	Comments: We would also note that part of the Dallington Grange SUE is shown on the proposals map as a Local Wildlife Site (LWS) where draft Policy 29 will apply. As the Council will be aware, a suite of detailed botanical surveys and assessment work was undertaken at the Dallington Heath LWS to inform the outline planning application. These works were to ascertain its "true" ecological value and to inform the ecological mitigation and enhancement strategy that will be controlled by planning condition on the outline planning permission. As such, the loss of the element of the LWS that incurs into the site and the mitigation for that loss has already been agreed by the Council in principle as reflected by the resolution to grant planning permission. This is not reflected on the proposals map and we feel that this this will be misleading for decision-makers and stakeholders particularly in light of the wording of draft Policy 29.	Suggested changes: Alterations to Policies Map to reflect changes to the LWS as part of the Dallington Grange SUE development.	Officer comments: It is recommended that the Policies Map be modified to reflect changes to the LWS as part of the Dallington Grange SUE development.
Representation reference: 224/1/3 Name: Friends of West Hunsbury Parks	Refers to: The Plan and policies map	Legal compliance and soundness: Plan is legally compliant. Plan is sound.	Comments: The area of land between LAA1112 and LAA1025 has no category allocated to it. This area is part of Ladybridge Park which is an amenity green space. It has at least 4 football pitches on it and Welland Valley Football Club are licensed by NBC to use the pitches. It is part of an amenity green space which is in constant use. The Park is a gated Park with no access to both Car Parks from 8am to 5:30 in the winter and 8am to 8:30pm in the summer.	Suggested changes: None specified.	Officer comments: The council will amend the Plan accordingly.

			This includes the Car Park by the football pitches,the area of land in question.		
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NORTHAMPTON
BOROUGH COUNCIL

NORTHAMPTON LOCAL PLAN PART 2 SUBMISSION PLAN

**PROPOSED SCHEDULE OF
MINOR MODIFICATIONS
NOVEMBER 2020**

**NORTHAMPTON LOCAL PLAN PART 2
SUBMISSION
PROPOSED SCHEDULE OF MINOR MODIFICATIONS**

A. PROPOSED MINOR MODIFICATIONS TO THE SUBMISSION PLAN

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
CHAPTER 5: QUALITY OF NEW DEVELOPMENT					
MM1	37	Para 5.5	Refers to Building for Life	Refers to Building for a Healthy Life	To reflect updated guidance
MM2	40	Policy 3 (last bullet point)	Refers to Building for Life certification	Refers to Building for a Healthy Life certification	To reflect updated guidance
MM3	41	Policy 4 (second last bullet point)	Refers to large developments and the need to include high quality public realm	Refers to all developments and not just large developments	To reflect consultation response from Homes England. The Council agrees that all developments need to incorporate high quality public realm
MM4	45	Para 5.28	Planning can assist in creating environments.....	Planning, <i>including through the usage of design tools such as Building for a Healthy Life (BHL)</i> , can assist.....	To reflect consultation response and to strengthen the position in relation to the Building for a Healthy Life guidelines
MM5	46	Policy 6		New bullet point added: <i>Use of design tools such as Building for a Healthy Life (BHL)</i>	To reflect consultation response and to strengthen the position in relation to the Building for a Healthy Life guidelines

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
MM6	47	Para 5.34	Anglian water's SUDs Adoption handbook sets out the circumstances in which SUDs features would be adopted by Anglian Water.	Anglian water's SUDs Adoption handbook <i>and the water sector Design and Construction Guidance</i> sets out the circumstances in which SUDs features would be adopted by Anglian Water.	To reflect consultation response from Homes England and to provide a factual update
MM7	47	Chapter 5 (before Policy 7)		New para added before Policy 7: <i>SuDS should be multiuse rather than set aside solely for the purpose of water storage. Building for a Healthy Life states that well designed multi-functional sustainable drainage will incorporate play and recreational opportunities.</i>	To reflect consultation response and to strengthen the position in relation to the Building for a Healthy Life guidelines
MM8	47	Policy 7	Last para: For all major development.....	Amend to: For all major development.....	To reflect consultation response from Anglian Water. The Council agrees that this policy should be applicable to all development and not just major development
		CHAPTER 7: RESIDENTIAL			
MM9	62	Policy 13	LAA0204 – 100 units	LAA0204 - 55 units	To reflect consultation response and to correct a capacity error
MM10	62	Policy 13	Sites 0168/ 1009/ 1142	Site 1144: new site reference	To reflect consultation

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
			allocated for residential	created to include the combination of sites 0168/ 1009/ 1142	response
MM11	66	Para 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 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.	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 serviced plots of land. <u>As at 2019, there were 32 entries on 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 a proportion of sites on development sites of more than 100 dwellings should be identified for self-build and custom build dwellings, as set out in Policy 14.</u>	To reflect consultation response.

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
		CHAPTER 9: HIERARCHY OF CENTRES, RETAIL AND COMMUNITY SERVICES			
MM12	81	Policy 19	2 nd paragraph 3 rd bullet point item i: Reference to use classes order A1	The policy will be updated to reflect the changes to the new use classes order	To reflect the new use class order which came into force on the 1 st September 2020
MM13	82	Policy 20	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.	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.	To reflect the new use class order which came into force on the 1 st September 2020
MM14	83	Policy 21	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.	Add to the policy: <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>	To reflect consultation response and to provide clarity on access to above ground floor accommodation
MM15	85	Footnote	Footnote 55 refers to "Planning the future of open space, sport and recreation	Amend Footnote 55 to read: "Planning.....West Northamptonshire – Part 3	To correct a factual error

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
			in West Northamptonshire – Part 2 Playing Pitch Strategy....”	Playing Pitch Strategy	
MM16	86	Para 9.26	Last sentence:rugby	Add:....rugby <i>union</i>	To clarify the name of the sport.
CHAPTER 10: BUILT AND NATURAL ENVIRONMENT					
MM17	98	Policy 29	<p>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.....</p> <p>2. In particular.....</p> <p>Sites of local importance</p> <p>Developments affecting the</p>	<p>1. The Council will require all major development proposals to <u>avoid, adequately mitigate, or, as a last resort, compensate biodiversity impact</u> 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 <u>such as the DEFRA metric</u>.....</p> <p>2. In particular.....</p> <p>Sites of local importance</p> <p>Developments affecting the Borough’s Local</p>	To reflect consultation response from statutory consultees including Natural England and NCC Ecology, to provide further policy clarification and to strengthen the policy.

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
			<p>Borough's Local Nature Reserves and Local Wildlife Sites.....</p> <p>Undesignated sites Development affecting sites that are not formally designated, but</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 of functionally linked land to the respective site. Applicants will be required to undertake up to date, comprehensive ecological surveys in accordance with industry guidelines</p>	<p>Nature Reserves and, Local Wildlife Sites and <u>Potential Wildlife Sites</u>.....</p> <p>Undesignated sites <u>Other biodiversity assets</u> Development affecting sites that are not formally designated, but.....</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 <u>consider the Northamptonshire Biodiversity SPD or successor document and where necessary,</u> undertake up to date, comprehensive ecological</p>	

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
			and standards. These will be required to	surveys ...	
MM18	100	Para 10.20		New sentence after the first 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 Special Protection Area has been designated.</u>	To reflect consultation responses
MM19	100	Policy 30	Proposals must ensure that there is no adverse impact either alone or cumulatively on	Proposals must ensure that there is no adverse impact either alone or <u>cumulatively in combination</u> on.....	To reflect consultation responses from statutory consultees including Natural England, NCC Ecology and Anglian Water, to provide further policy clarification and to strengthen the policy.
			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 predationwill not have a detrimental impact.	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 <u>predation.....will not have have a detrimental impact</u> an adverse impact.	
			Proposals for the Special Protection Area and	Proposals for-.....the	

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
			<p>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>	<p>Special Protection Area and the species for which the land is designated (<u>in accordance with the Habitats Regulations and the Upper Nene Valley Gravel Pits Supplementary Planning Document</u>). Significant effects could include the loss or fragmentation of <u>functionally linked land and supporting habitat</u>, 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. <u>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.</u> Applicants should refer to Table 2 of the Upper Nene Valley Gravel Pits Special</p>	

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
				<p>Protection Area Supplementary Planning Document for guidance on when to consult with Natural England.</p> <p>And add at the end of the policy the following: <u>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.</u></p>	
MM20	100	Policy 30	3 rd para: Proposals for major developments within close proximity of the SPA will.....	<p>Reference to close proximity – amend to include reference to 3km</p> <p>Proposals for major <u>all</u> developments within close proximity <u>3 km</u> of the SPA will.....</p>	To reflect consultation response from Natural England and to provide clarity on what constitutes close proximity
CHAPTER 11: MOVEMENT					

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
MM21	106	Policy 32	Fourth bullet point: To maximise opportunities for integrated secure and safe walking and cycling routes which connect to the existing network, as well as open spaces and green infrastructure	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	To reflect consultation response and to ensure that all public rights of way are embedded in the policy
MM22	106	Policy 32	Last bullet point: To provide electric vehicle re-charging points in line with Policy 34 and Policy 35	Last bullet point: To provide electric vehicle re-charging points in line with Policy 34 and Policy 35	To reflect consultation response from the House Builders Federation and reference to Policy 34 is not required
MM23	109	Policy 34	First para: the route of the former Northampton to Market Harborough railway line, as shown on the Policies Map, is safeguarded for future transport use	The routes of the former Northampton to Market Harborough railway line <u>and the Northampton to Brackmills railway line</u> , as shown of the Policies Map, is <u>are</u> safeguarded for future transport use	To reflect consultation response and to ensure that the safeguarded routes are embedded in policy
CHAPTER 12: INFRASTRUCTURE					
MM24		Para 12.12	The plan calculates the additional school places required to accommodate the future growing population. It is recognised that there are also free schools located within Northamptonshire. A free school is a type of academy, a non- profit making,	The plan calculates the additional school places required to accommodate the future growing population <i>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.</i> It is	To reflect consultation response from Northamptonshire County Council and to provide further factual details

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
			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.	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. <i>The majority of new schools delivered in Northampton will be free schools.</i>	
MM25	112	Para 12.13	The funding provision for education is provided through a number of mechanisms including from the Government, the Education Agency and through securing funding from developers via Section 106 Agreements and the Community Infrastructure Levy. Developers should seek the advice of the Local Education Authority and the Local Planning Authority to determine what level of education provision will need	The funding provision for education <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	To reflect consultation response from Northamptonshire County Council and to provide further factual details

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
			to be provided, where it is to be located and the associated cost.	provision will need to be provided <u>in order to mitigate the development</u> , where it is to be located and the associated cost.	
MM26	112	New para 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>	To reflect consultation response from Northamptonshire County Council
MM27	112	Policy 37	First para: Major development proposals..... Developers are also required to provide delivery of "full fibre" connectivity to new built development.	First para: Major development proposals..... Developers are also required to provide delivery of "full fibre" connectivity to new built development.	To reflect consultation response from Northamptonshire County Council and avoid duplication
CHAPTER 13: SITE SPECIFIC ALLOCATIONS AND POLICIES					
MM28	115	Policy 38		Add 0615 Crow Lane	This was an omission – it is shown on the Policies Map but not in the policy
MM29	115	Policy 38	Sites 0168/ 1009/ 1142 allocated for residential	Site 1144: new site reference created to include the	To reflect consultation response

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
				combination of sites 0168/ 1009/ 1142	
MM30	116 and 180	Policy 38/ Appendix A/ Policies Map	Connaught Road was included in the list of development sites	SAMLAA concluded that this site was not suitable for allocation. Remove	The site was included in error.
MM31	117	Para 13.6	Second sentence: Network Rail has indicated that subject to the current and future freight/ commercial operation being moved elsewhere, this opens up the potential for the residual railway land to be developed. There is potential	Network Rail has indicated that subject to the <u>provision of a suitable replacement site to accommodate railfreight activities</u> , this opens up the potential for the residual railway land to be developed. There is potential	To reflect consultation response from Network Rail.
MM32	118	New para		Add a new para to the supporting text for Policy 39: <u>There is an existing sewer in Anglia 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</u>	To reflect the consultation response from Anglian Water

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
				<u>possible a formal application to divert Anglian Water's existing assets may be required.'</u>	
MM33	119	Policy 39 (first bullet point under design principles)	<ul style="list-style-type: none"> A high quality development that preserves and enhances the significance of the former castle site and in particular the scheduled monument and listed Postern Gate and the setting of these heritage assets. The proposals should provide opportunities to enhance the significance of the identified heritage assets 	<ul style="list-style-type: none"> A high quality development that preserves and enhances the significance and <u>appreciation</u> of the former castle site, its designated components and their setting. <u>Design and capacity will be informed by detailed archaeological investigations and assessments in advance of development and in particular the scheduled monument and listed Postern Gate and the setting of these heritage assets. The proposals should provide opportunities to enhance the significance of the identified heritage assets</u> 	To reflect the consultation response from Historic England and to strengthen the policy position on archaeology
MM34	119	Policy 39		Add a new bullet point: <u>The safeguarding of suitable access for the maintenance of foul drainage infrastructure.</u>	To reflect the consultation response from Anglian Water and to strengthen the policy position.

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
MM35	121	Policy 39		Add new bullet point to design principle: <u>The safeguarding of suitable access for the maintenance of foul drainage infrastructure.</u>	To reflect the consultation response from Anglian Water.
MM36	123	New para		Add the following to the supporting text for Policy 41: <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>	To reflect consultation response from Anglian Water.
MM37	125	Para 13.12		Add the following after the first para: <u>It is therefore important to ensure that there is a reasonable buffer created between this existing</u>	To clarify and justify the need for the buffer within the area allocated for development.

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
				<u>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 maintain.</u> <u>There will also be an opportunity to provide woodland and semi natural stepping stones (connected habitats) adjacent to and within the site that will provide habitat links.</u>	
MM38	126	Policy 41	Bullet point 1: <ul style="list-style-type: none"> 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 	Bullet point 1: <ul style="list-style-type: none"> If significant numbers of Golden Plover or Lapwing are identified at the site, <u>offsite appropriate</u> mitigation will be required for the loss of habitat i.e. functionally linked land 	To reflect consultation response from Homes England.
MM39	126	Policy 41	Bullet point 2: There will also be an opportunity to provide woodland and semi natural stepping stones (connected habitats) adjacent to and within the site that will provide habitat links.	Bullet point 2: Remove and add to para 13.12	To reflect consultation response from Northamptonshire County Council (Ecology).

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
MM40	126	Policy 41	Bullet point 7: 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.	Bullet point 7: 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>	To reflect consultation response from Northamptonshire County Council (Ecology).
MM41	127	Policy 41		Add new bullet point: <ul style="list-style-type: none"> • <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> 	To reflect consultation response from Anglian Water.
MM42	127	Policy 41		Add new bullet point: <ul style="list-style-type: none"> • <u>The safeguarding of suitable access for the maintenance of foul drainage infrastructure</u> 	To reflect consultation response from Anglian Water.
MM43	128	Policy 43	First bullet point: <ul style="list-style-type: none"> • Generally be two to 	First bullet point: <ul style="list-style-type: none"> • Generally be two to four 	To reflect consultation response from Historic

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
			four storeys in height, with opportunities for taller buildings_facing along the principal movement routes and the northern section of the site	storeys in height, with opportunities—for taller buildings_facing along the principal movement routes and the northern section of the site	England
MM44	128	Policy 43		Add a new bullet point: <u>Prior to development of the site, further archaeological assessment will be required to inform development and layout of the site.</u>	To reflect consultation response from Historic England
MM45	130	Figure 22	Reference to: Green corridor	Change to “ <u>greenspace (indicative)</u> ”	To reflect consultation response from Homes England and to ensure that the reference aligns with the policy
MM46	131	Policy 44		Add new bullet point: <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>	To reflect consultation response from Anglian Water.

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
TABLE 12: IMPLEMENTATION AND MONITORING FRAMEWORK					
MM47	154	Objective 10	Biodiversity net gain Major developments must offset and secure a net gain in biodiversity	Major developments must offset and secure a net gain in biodiversity	To reflect consultation response from Homes England.
GLOSSARY					
MM48	165			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>	To clarify what is defined as functionally linked land as this is referred to in policy
APPENDIX A					
MM49	175		0168/ 1009/ 1142	Merge to become new site 1144 and update the quantum and delivery timeline	To reflect consultation response
MM50	175		0204	Amend capacity to 55 and update the delivery timeline	To reflect consultation response
MM51	178		1097	Update trajectory – amend the timeline delivery	To reflect consultation response
MM52	179		1098	Update trajectory – amend the delivery timeline	To reflect consultation response
MM53	179		1099	Update trajectory – amend the delivery timeline	To reflect consultation response

Ref	Page no	Chapter/ Policy/ para/ table/ figure/ appendix	Proposed Submission Round 2 (July 2020)	Submission (January 2021)	Reason for change
MM54	180		1139	Update trajectory – amend from 200 to 500 dwellings	To reflect consultation response
APPENDIX B: SUPERSEDED POLICIES					
MM55	183	D4	Not suitable for allocation	Suitable for employment allocation	To reflect consultation response and to correct an error
APPENDIX G: PRIMARY EDUCATION					
MM56	194	E41	New 3 form entry primary school in Collingtree	Removed	To reflect consultation response from Northamptonshire County Council (Developer Contributions).


B. PROPOSED MINOR MODIFICATIONS TO THE POLICIES MAP

BOROUGH WIDE POLICIES MAP			
REF	SITE	CHANGES REQUIRED	REASON FOR CHANGE
MM57	615: Crow Lane	Change from brown to purple – this is an employment allocation	The site was incorrectly coloured brown which is for residential. It should be purple, which is the key for employment allocation
MM58	1005: Martins Yard	The current allocation do not show the area where employment can developed (Plan 1). A revision to the plan is needed to show where the employment allocation should be, for clarity, to distinguish it from the remaining area which is allocated for ecological enhancement (Plan 2)	To clarify the policy position in relation to the employment allocation within the site
MM59	New designation	The area of land between LAA1112 and LAA1025 -	To reflect consultation responses from Parish

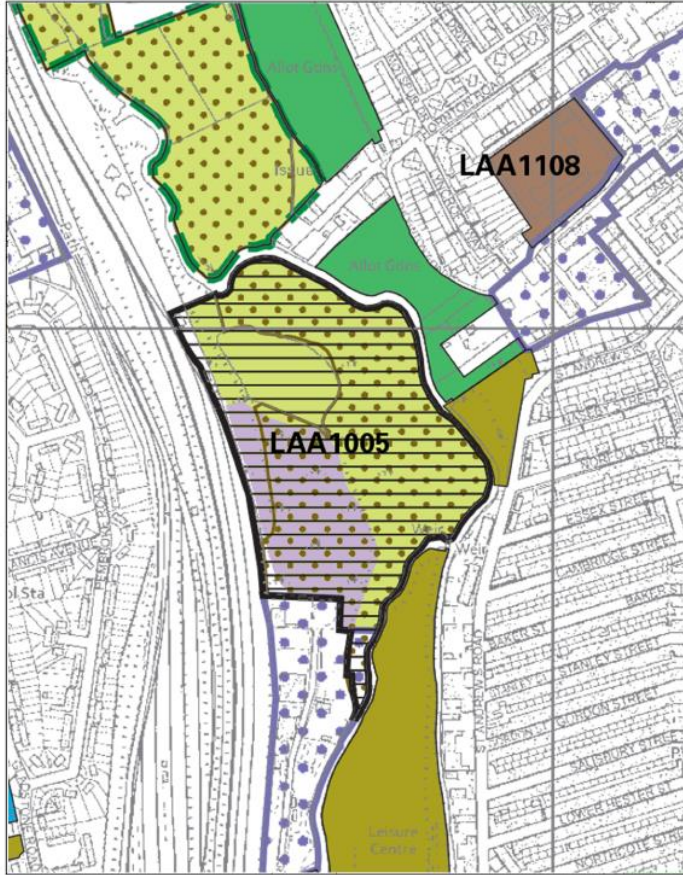
		Update Policy Map to include Welland Valley FC (Off Ladybridge Drive) as Amenity Green Space allocation (see Plan 3)	Councils and to update the plan
MM60	New site: LAA1144	New site 1144 (merges 0168, 1109 and 1142 as one map, so remove the references to these three sites and replace with a new reference LAA1144 – see Plan 4)	To reflect consultation response. The respondent concluded that the three sites can be merged because they are owned by landowners who are able to work together towards their delivery
MM61	Additional key	Update the Policies Map to include the Northampton Railway Station to Brackmills route to align with the proposed minor modification to Policy 34 (Plan 5)	To reflect consultation response and to clarify the policy position on key transport routes
MM62	Dallington Grange LWS	Update the Policies Map to remove the LWS allocation within Dallington Grange SUE as agreed in the planning approval (December 2019) (Plan 6)	To reflect consultation response and to update the policies map to reflect the current position following planning approval in principle
MM63	Potential Wildlife Sites	Update the Policies Map to show where all the PWS sites are located, to indicate where this element of Policy 29 applies	To reflect consultation response and to update the Policies Map

PLAN 1
SITE 1005 MARTINS YARD
EXISTING ALLOCATION IN THE POLICIES MAP




 NORTHAMPTON BOROUGH COUNCIL	Title: Site 1005 - Policies map extract	Date: 30/10/2020
	<small>© Crown Copyright 2014. 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 100019055.</small>	Scale: NTS

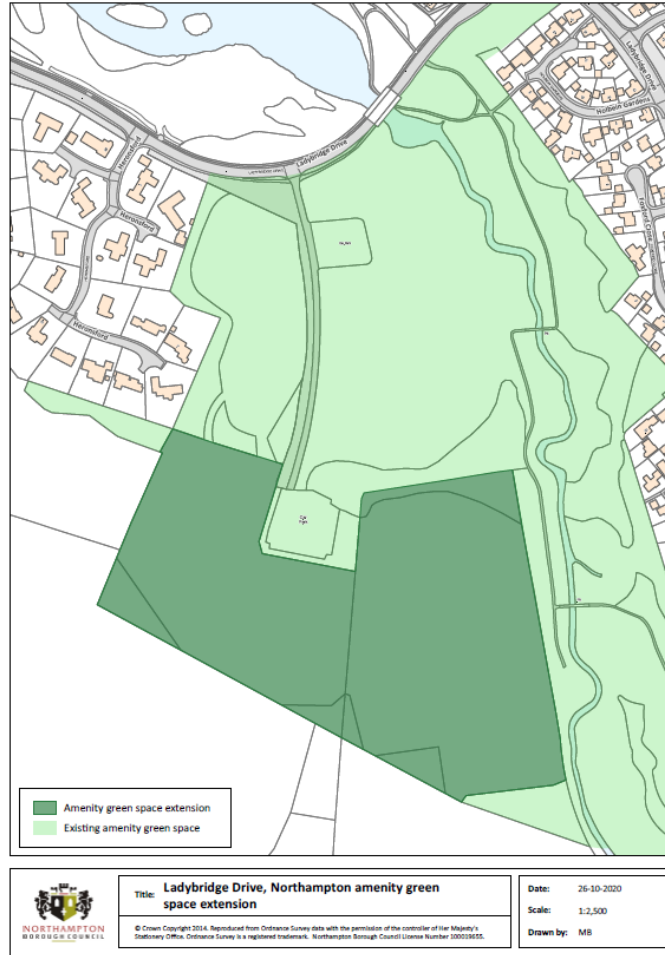
PLAN 2
SITE 1005 MARTINS YARD
PROPOSED MINOR MODIFICATION TO SITE 1005



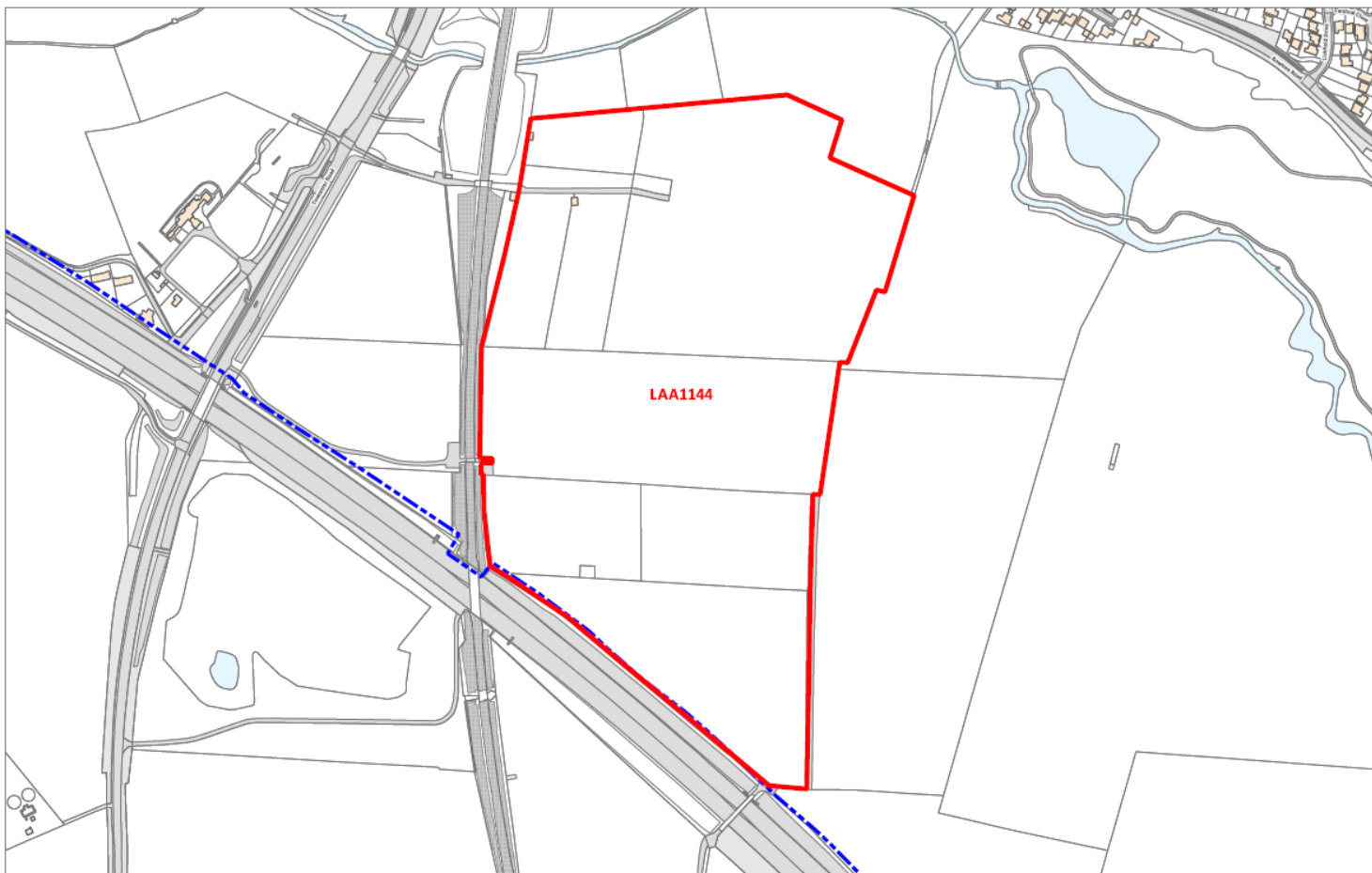
707

 NORTHAMPTON BOROUGH COUNCIL	Title: Site 1005 amendment - employment land	Date: 30/10/2020
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		Drawn by: MB

PLAN 3 NEW AMENITY SPACE DESIGNATION (IN DARKER GREEN)



PLAN 4
MERGED SITES 0168, 1109 AND 1142 AND RENAME AS SITE 1144

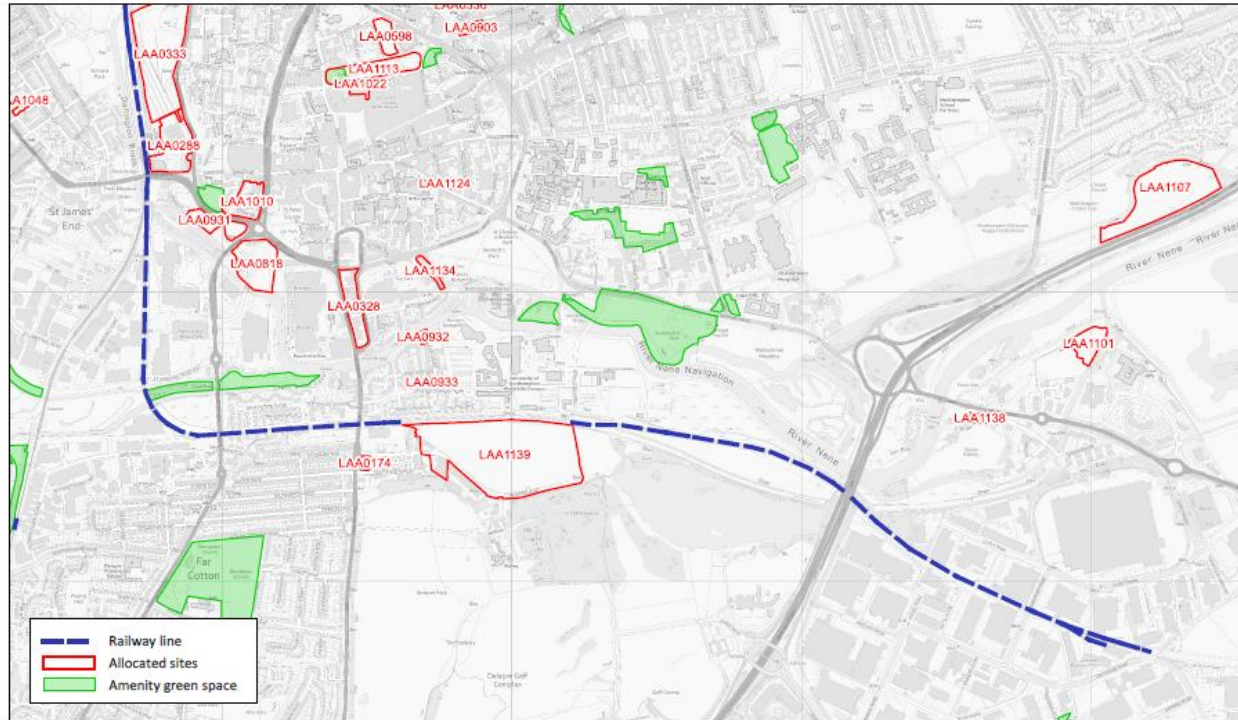



LAA1144 - Land west of Northampton South SUE (area: 18.76 hectares)

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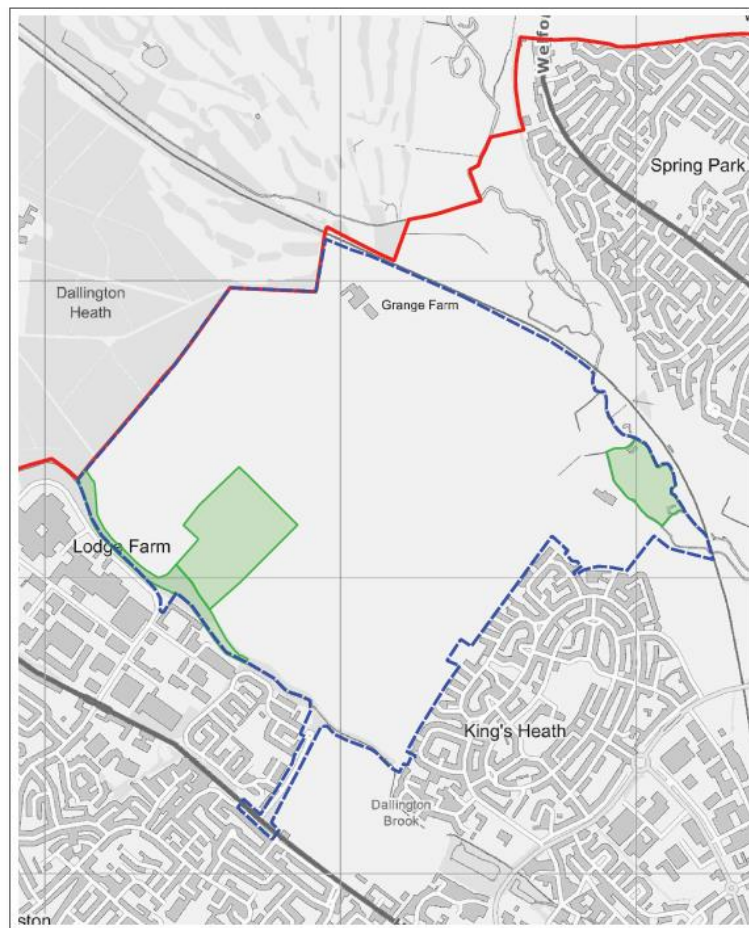
PLAN 5
SAFEGUARDED RAILWAY LINE FROM NORTHAMPTON RAILWAY STATION TO BRACKMILLS

710



 NORTHAMPTON BOROUGH COUNCIL	Title: Safeguarded railway line	Date: 26-10-2020
	<small>© Crown Copyright 2014. 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 License Number 100019655.</small>	Scale: 1:15,000
		Drawn by: MB

Map 6
Dallington Grange and Local Wildlife Site



Dallington Grange SUE
Local Wildlife Sites

-  Dallington Grange SUE
-  Local Wildlife Sites
-  Northampton boundary

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Appendices: 1



COUNCIL

18 January 2021

Agenda Status: Public

Chief Executive

Report Title	COMMUNITY GOVERNANCE REVIEW AND SUGGESTED BUDGETS/PRECEPTS FOR NORTHAMPTON TOWN COUNCIL, KINGSTHORPE PARISH COUNCIL AND FAR COTTON & DELAPRE COMMUNITY COUNCIL
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1 Background

1.1 In conjunction with NCALC the Cross-Party Working Group considered the funding requirement for each of the new Parish Councils to function and operate in their first year and be safe and legal in doing so. It is for the new Councils to determine the final precept taking into account what activities and services they consider the new Councils could offer and deliver within their areas for the benefit of the community in their first year of operation.

The new Councils will set their precepts.

2. Purpose

2.1 To report to Full Council the recommended suggestions for a first-year base budget as set out below from the Cross-Party Working Group held on the 9 December 2020. These recommended suggestions are part of the process for putting in place the decisions of Full Council at its meetings on the 20 January, 24 February and the 2 November 2020.

2.2 To agree the suggested 2021/22 base budget to the Northampton Town Council, the Kingsthorpe Parish Council and the Far Cotton & Delapre Community Council.

3. Recommendations

3.1 That Council accept the suggested base budgets for Northampton Town Council, Kingsthorpe Parish Council and Far Cotton & Delapre Community Council, as set out at paragraph 4.3, and in turn suggest to the Northampton Town Council, the Kingsthorpe Parish Council and the Far Cotton & Delapre Community Council to set

these budgets for their respective Councils for 2021/22 to ensure their safe and legal operation. In finalising their budgets, the Councils will need to take into account the services the new Councils could want to deliver in their respective areas for the benefit of their residents.

4. Issues

- 4.1 On the 9 December 2020 the Cross-Party Working Group discussed and agreed three suggested 2021/22 budgets for Northampton Town Council, Kingsthorpe Parish Council and Far Cotton & Delapre Community Council. Attached at appendix 1 is the report that went to that meeting that sets out the decisions they made to reach the suggested budgets to enable the safe and legal operation of the new Councils. Items in red were not part of the original report, but show the decisions made at that meeting.
- 4.2 It should be noted that this is a suggested budget for 2021/22. This suggested budget is intended to generate sufficient council tax income for each of the three Councils to allow them to operate safe and legally during 2021/22. In building up this suggested budget the Cross-Party Working Group looked at likely items of expenditure that these Councils would incur in 2021/22. However, this is not intended to be a prescriptive budget: the suggested budgets will generate income for each of the Councils to operate, but it will be up to each of the three new Councils to decide how they wish to spend this money in 2021/22.
- 4.3 The table below sets out the suggested budgets for each of the three Councils. Also included in this table is the current estimated tax base for each of the authorities, and based on that estimated tax base, an estimated Band D equivalent council tax charge for the residents of these new parish areas. Note that the tax base is not yet finalised, and could still change, but any changes are likely to be relatively small.

Council	Suggested 2021/22 precept requirement (£)	Estimated 2021/22 tax base	Estimated 2021/22 band D equivalent council tax (£)
Northampton Town Council	1,111,000	36,401	30.52
Kingsthorpe Parish Council	222,000	6,913	32.11
Far Cotton & Delapre Community Council	148,000	3,058	48.40

- 4.4 If Full Council accepts the above suggested budgets, they will in turn be suggested to each of the three Councils. There is no requirement for the new Councils to accept Full Council's suggestions which would leave them free to decide their own individual precepts.

5. Implications (including Financial Implications)

- 5.1. The Council's policy is to create three new councils and give greater representation to its citizens on issues and concerns that will arise locally in the future.

6 Resources and Risk

- 6.1. The issue of costs is being monitored by the Cross-Party Working Group.

7 Legal

- 7.1. There are no legal issues at this stage except for the need to comply with the requisite legislation.

8 Environmental implications

- 7.1. None at this stage.

9 Other Implications

- 9.1. None at this stage.

10 Background Papers

- 10.1. As enclosed.

**George Candler
Chief Executive**

CROSS PARTY WORKING GROUP – 09/12/2020

COMMUNITY GOVERNANCE REVIEW

Report Title:	New Town and Parish Councils' Draft Precept Report
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1. Purpose

- 1.1. The purpose of this report is to set out draft precepts for the new Northampton Town Council, Kingsthorpe Parish Council, and Far Cotton & Delapre Community Council (from here on, referred to as “the new Town and Parish Councils”) for 2021/22, to be recommended for Full Council to approve and in turn recommend to the new town and parish councils to formally set.

2. Recommendations

- 2.1. That the working group consider the draft precepts put forward, and some of the issues described in the report below and agree any amendments to be made to the precepts, so that the draft precepts can be taken to Full Council in January.

3. Tax base

- 3.1. A draft tax base has now been calculated for the new town and parish councils. The total precept set by each council will be divided by the tax base to give the band D equivalent charge for the council taxpayers. It should be noted that this is only a draft tax base at this stage, but it is unlikely that any significant change would be made to this. The draft tax bases for the new town and parish councils are as follows:

Council	Draft 2021/22 tax base
Northampton Town Council	36,401
Kingsthorpe Parish Council	6,913
Far Cotton & Delapre Parish Council	3,058

4. Set up costs incurred by NBC

- 4.1. In July 2018 Council agreed to delegate a budget of up to £30,000 to undertake any specialist activity associated with undertaking a community governance review. Then in January 2020 Council agreed an additional budget of £100,000 to cover the period to the end of the financial year 2019/20. This gave an overall budget of £130,000. This budget was fully spent by the end of 2019/20 and was taken from Northampton Borough Council's reserves.
- 4.2. Northampton Borough Council are continuing to incur costs in the current year in relation to the Community Governance Review. The table below shows the costs that have been incurred to date in 2020/21, and the forecast costs for the full year. The forecasts include an increase in the budget of approximately £20k to allow an extension to the NCALC contract to the end of March 2021.

Expenditure incurred by NBC	Costs incurred to date in 2020/21 (£)	Forecast costs still to be incurred in 2020/21 (£)	Total forecast costs for the year 2020/21 (£)
Staff costs	44,914	22,457	67,371
Other incidental costs	24,310	0	24,310
NCALC	29,175	20,000	49,175
Legal advice	9,192	0	9,192
Total	107,591	42,457	150,048

4.3. In addition to the above set up costs, there will also be election costs that will be incurred in relation to the new town and parish councils. The set-up costs and the election costs will either need to remain with NBC, and will need to be taken from NBC reserves, or they will need to be recharged on to the new town and parish councils. If they are to be charged to the new town and parish councils, the split is shown below (note that the set-up costs are apportioned based on tax base size):

Council	Estimated set-up costs (£)	Estimated election costs (£)	Estimated total charge (£)
Northampton Town	117,785	70,000	187,785
Kingsthorpe Parish	22,369	15,000	37,369
Far Cotton Parish	9,895	9,000	18,895
Total	150,048	94,000	244,048

4.4. The budgets later in this report assume that these costs will be charged to the new town and parish councils. If it is decided that this is not the case, then this element will come out.

Decision 1 – should the set up and election costs be recharged to the new Town and Parish Councils?

Agreement 1 – It was agreed at the meeting that the election costs would be charged to the new Town and Parish Councils, but the set-up costs would not be.

5. Northampton Town Council

5.1. The staffing costs for Northampton Town Council for 2021/22 have been reviewed by NCALC and the latest estimate of the requirement is set out below, with on-costs shown separately.

Northampton Town	Salary	NI	Pens	Total
Town Clerk	77,783	10,734	23,335	111,852
Full time admin post	29,577	4,082	8,873	42,532
Part time admin post (25 hrs per week)	15,594	2,152	4,678	22,424
Part time finance assistant (25 hrs per week)	19,372	2,673	5,812	27,857
Total	142,326	19,641	42,698	204,665

Other staffing costs (recruitment, travel, relocation, training/development)	16,000
Total	220,665

5.2. An amount of £180,000 is included in the draft budget for accommodation costs. This is an estimate of the expected cost of a service charge for the lease of the Guildhall to Northampton Town Council.

5.3. Previous versions of the draft budget had included an amount of £50,000 for Mayoral and Member costs. This was to cover Members allowances, and a mayor's allowance and mayors transport. This figure has now been increased to cover more of the costs expected to transfer from NBC to the Town Council in relation to the mayoralty. The new figure is based on the following:

Mayoral and Member costs	£
Members allowances (£1,000 per Member)	26,000
Members expenses	2,000
Mayor making event (based on NBC budget)	5,980
Civic & Mayoralty Officer (incl. on-costs, based on NBC budget)	33,411
Mayors transport (vehicle costs and driver, based on NBC budget)	28,741
Other general costs (furniture & equipment, stationery, printing, etc, based on NBC budget)	6,035
Mayoral Expenses (based on NBC budget)	27,544
Total	129,711

5.4. Based on the items described earlier in this report updating previous versions of the draft budget, we arrive at the following proposed draft precept for Northampton Town Council (note some figures are rounded up slightly as just estimates):

Northampton Town budget item	2021/22 £
Staffing costs (including Town Clerk, and one fulltime, two part-time admin staff), relocation costs, recruitment advertising, travel costs, etc	221,000
Professional services/subscriptions (audit, insurance, legal fees, etc)	40,000
Running costs (including payroll/finance system costs, postage, office supplies, telephones, etc)	40,000
Mayoral and Member costs	130,000
Year 1 set up and election costs	188,000
Accommodation costs	180,000
Other miscellaneous running costs and contingency	30,000
Amounts to develop future services in 2021/22 and/or transfer to reserves	400,000
Total	1,229,000

Estimated tax base	36,401
Band D charge	33.76

5.5. The above shows that the precept requirement for Northampton Town would be £1,229,000. This would equate to a band D equivalent charge of £33.76 based on the draft tax base.

Decision 2 – accept the above draft precept, or make any amendments to it?

Agreement 2 – The above table was amended to remove the set-up costs. The updated table and precept are shown below:

Northampton Town budget item	2021/22 £
Staffing costs (including Town Clerk, and one fulltime, two part-time admin staff), relocation costs, recruitment advertising, travel costs, etc	221,000
Professional services/subscriptions (audit, insurance, legal fees, etc)	40,000
Running costs (including payroll/finance system costs, postage, office supplies, telephones, etc)	40,000
Mayoral and Member costs	130,000
Election costs	70,000
Accommodation costs	180,000
Other miscellaneous running costs and contingency	30,000
Amounts to develop future services in 2021/22 and/or transfer to reserves	400,000
Total	1,111,000

Estimated tax base	36,401
Band D charge	30.52

6. Kingsthorpe Parish Council

6.1. The staffing costs for Kingsthorpe Parish Council have been reviewed by NCALC and the Parish Clerk position was the subject of a paper at the last CPWG. It is anticipated that there will be an interim clerk at the Council, with the permanent clerk joining around August. The suggested salary of the permanent clerk is based partly on the size of the parish, and this can be measured by the size of the precept. The following table shows the recommended salary levels for different precept levels:

Band D level	Precept	Salary Scale	Annual Salary
			(37 hours/week)

£75	£465,375	LC3 SCP 3741	£40,876- £44,863
£50	£310,250	LC3 SCP 3336	£36,922- £39,880
£35	£217,175	LC2 SCP 2932	£32,910- £35,745

- 6.2. NCALC have advised that they think the permanent Clerk salary should be set at £36,922, and this is included in the current draft budget.
- 6.3. NCALC have also now advised that it is likely that a council as large as Kingsthorpe will require a part time member of staff in addition to the clerk.
- 6.4. The table below shows the staffing costs based on the NCALC recommendations. These costs are higher than the staffing costs that had previously been put forward.

Kingsthorpe Parish staffing	Interim	Salary	NI	Pens	Total
Interim Clerk	14,216				14,216
Permanent Clerk (starting August; 37 hrs per week)		23,830	3,289	7,149	34,268
Part time member of staff (starting August; 15 hrs per week)		6,238	861	1,871	8,970
Total	14,216	30,068	4,149	9,020	57,454

Other staffing costs (training/development)	3,300
Total	60,754

Decision 3 – accept these higher staffing costs as advised by NCALC? **Agreement 3** – The staffing costs set out above were accepted.

- 6.5. Accommodation costs of £10,000 have been included in the draft precept. It is anticipated that this would be sufficient to cover accommodation costs whether that be rent, lease, or maintenance of property owned by the Council.
- 6.6. A contingency amount for unforeseen running costs had previously been included in the Kingsthorpe budget at £4,000. NCALC have recently reviewed this figure and are now recommending that this be increased to £45,000 on the basis that a contingency must be a realistic figure, so the Council does not run into operational and financial difficulties in the first year.

Decision 4 – the precept budget currently only includes the original £4,000 – should this be increased, and to how much?

Agreement 4 – it was agreed that the contingency would be increased to £45,000.

- 6.7. An amount of £15,000 had previously been put forward for “developing future services/transferring to reserves”. NCALC have recently reviewed this figure and are now recommending that this be increased to £80,000 on the basis that as the parish

council is in its first year of operation, it has no reserves, and that the reserve level should be set at between 6-9 months of the baseline budget.

Decision 5 – the precept budget currently includes the original £15,000 – should this be increased, and to how much?

Agreement 5 – it was agreed that the budget for “developing future services/transferring to reserves” would be increased to £80,000.

6.8. Based on the items described earlier in this report updating previous versions of the draft precept, we arrive at the following proposed draft precept for Kingsthorpe Parish Council (note some figures are rounded up slightly as just estimates):

Kingsthorpe Parish budget item	2021/22 £
Staffing costs (Town Clerk), including training, etc	£61,000.00
Professional services/subscriptions (audit, insurance, legal fees, etc)	£6,000.00
Running costs (including payroll/finance system costs, postage, office supplies, telephones, etc)	£2,000.00
Year 1 set up and election costs	£38,000.00
Accommodation costs	£10,000.00
Other miscellaneous running costs	£3,000.00
Contingency	£4,000.00
Amounts to develop future services in 2021/22 and/or transfer to reserves	£15,000.00
Total	£139,000.00

Estimated tax base	6,913
Band D charge	20.11

6.9. The above shows that the precept requirement of Kingsthorpe Parish would be £139,000. This would equate to a band D equivalent charge of £20.11 based on the draft tax base.

Decision 6 – accept the precept budget above, or amend based on any of the other decisions or discussions?

Agreement 6 – the above table was updated to remove set up costs and add in the higher levels of contingency and service/reserves budget. The updated table and precept are shown below:

Kingsthorpe Parish budget item	2021/22 £
Staffing costs (Town Clerk), including training, etc	£61,000.00
Professional services/subscriptions (audit, insurance, legal fees, etc)	£6,000.00

Running costs (including payroll/finance system costs, postage, office supplies, telephones, etc)	£2,000.00
Election costs	£15,000.00
Accommodation costs	£10,000.00
Other miscellaneous running costs	£3,000.00
Contingency	£45,000.00
Amounts to develop future services in 2021/22 and/or transfer to reserves	£80,000.00
Total	£222,000.00

Estimated tax base	6,913
Band D charge	32.11

7. Far Cotton & Delapre Parish Council

7.1. The staffing costs for Far Cotton & Delapre Parish Council have been reviewed by NCALC and the Parish Clerk position was the subject of a paper at the last CPWG. It is anticipated that there will be an interim clerk at the Council, with the permanent clerk joining around August. The suggested salary of the permanent clerk is based partly on the size of the parish, and this can be measured by the size of the precept. The following table shows the recommended salary levels for different precept levels:

Band D level	Precept	Salary Scale	Annual Salary
			(30 hours/week)
£75	£207,000	LC2 SCP 2932	£26,684- £28,982
£50	£138,000	LC2 SCP 2428	£23,248- £26,136
£35	£96,600	LC2 SCP 2426	£23,248- £24,690

7.2. NCALC have advised that they think the permanent Clerk salary should be set at £26,684, and this is included in the current draft budget.

7.3. NCALC have also now advised that it is likely that Far Cotton and Delapre will require a part time member of staff in addition to the clerk.

7.4. The table below shows the staffing costs based on the NCALC recommendations. These costs are higher than the staffing costs that had previously been put forward.

Far Cotton Parish staffing	Interim	Salary	NI	Pens	Total
Interim Clerk	8,789				8,789
Permanent Clerk (starting August, 30 hrs per week)		16,460	2,271	4,938	23,669
Part time member of staff (starting August; 15 hrs per week)		6,238	861	1,871	8,970

Total	8,789	22,698	3,132	6,809	41,429
Other staffing costs (training/development)					2,850
Total					44,279

Decision 7 – accept these higher staffing costs as advised by NCALC? **Agreement 7** – The staffing costs set out above were accepted.

7.5. Accommodation costs of £10,000 have been included in the draft precept. It is anticipated that this would be sufficient to cover accommodation costs whether that be rent, lease, or maintenance of property owned by the Council.

7.6. A contingency amount for unforeseen running costs had previously been included in the Far Cotton & Delapre budget of £4,000. NCALC have recently reviewed this figure and are now recommending that this be increased to £25,000 on the basis that a contingency must be a realistic figure so the Council does not run into operational and financial difficulties in the first year.

Decision 8 – the precept budget currently only includes the original £4,000 – should this be increased, and to how much?

Agreement 8 – it was agreed that the contingency would be increased to £25,000.

7.7. At a previous CPWG the budget for “developing future services/transferring to reserves” for Far Cotton & Delapre was increased from £10,000 to £15,000. NCALC have recently reviewed this figure and are now recommending that this be increased to £50,000 on the basis that as the parish council is in its first year of operation, it has no reserves, and that the reserve level should be set at between 6-9 months of the baseline budget.

Decision 9 – the precept budget currently includes the original £15,000 – should this be increased, and to how much?

Agreement 9 – it was agreed that the budget for “developing future services/transferring to reserves” would be increased to £50,000.

7.8. Based on the items described earlier in this report updating previous versions of the draft precept, we arrive at the following proposed draft precept for far Cotton & Delapre Parish Council (note some figures are rounded up slightly as just estimates):

Far Cotton & Delapre budget item	2021/22 £
Staffing costs (Town Clerk), including training, etc	£45,000.00
Professional services/subscriptions (audit, insurance, legal fees, etc)	£4,000.00
Running costs (including payroll/finance system costs, postage, office supplies, telephones, etc)	£2,000.00
Year 1 set up and election costs	£19,000.00
Accommodation costs	£10,000.00
Other miscellaneous running costs	£3,000.00

Contingency	£4,000.00
Amounts to develop future services in 2021/22 and/or transfer to reserves	£15,000.00
Total	£102,000.00

Estimated tax base	3,058
Band D charge	33.36

7.9. The above shows that the precept requirement of Far Cotton & Delapre Parish would be £102,000. This would equate to a band D equivalent charge of £33.36 based on the draft tax base.

Decision 10 – accept the precept budget above, or amend based on any of the other decisions or discussions?

Agreement 10 – the above table was updated to remove set up costs and add in the higher levels of contingency and service/reserves budget. The updated table and precept are shown below:

Far Cotton & Delapre budget item	2021/22 £
Staffing costs (Town Clerk), including training, etc	£45,000.00
Professional services/subscriptions (audit, insurance, legal fees, etc)	£4,000.00
Running costs (including payroll/finance system costs, postage, office supplies, telephones, etc)	£2,000.00
Election costs	£9,000.00
Accommodation costs	£10,000.00
Other miscellaneous running costs	£3,000.00
Contingency	£25,000.00
Amounts to develop future services in 2021/22 and/or transfer to reserves	£50,000.00
Total	£148,000.00

Estimated tax base	3,058
Band D charge	48.40

8. Next steps

8.1. If the CPWG approve the draft budgets above, or agree specific amendments, the draft precepts (or amended draft precepts) can be recommended to Full Council in January to in turn recommend to the new Town and Parish Councils to formally set.

Appendices: 1



COUNCIL

18th January, 2021

Agenda Status: Public

Chief Executive

Report Title	COMMUNITY GOVERNANCE AND ASSET TRANSFERS
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1. Purpose

- 1.1 The enclosed report from the Corporate Asset Manager [Enclosed as Appendix A] which was presented to the Cross-Party Working Group at its meeting on the 9th December 2020 dealt with recommendations in respect of assets for the new Northampton Town Council, Kingsthorpe Parish Council and Far Cotton and Delapre Community Council and Council is now being asked to both consider and then decide whether to adopt the recommendations set out below with the background information contained in the enclosed report marked as Appendix A:
- 1.2 1.2 Decisions now have to be considered and decided upon by Full Council in order that a number of issues can be moved forward which will assist and support the establishment and successful future of Northampton Town Council, Kingsthorpe Parish Council and Far Cotton and Delapre Community Council. This is part of the ongoing process that will need to take place between now and the 31st. March 2021 and very likely beyond that date in partnership and discussion with the new West Northants Unitary Authority

2. Recommendations

The enclosed report from the Corporate Asset Manager [Enclosed as Appendix A] which was presented to the Cross-Party Working Group at its meeting on the 9th December 2020 dealt with recommendations in respect of assets for the new Northampton Town Council, Kingsthorpe Parish Council and Far Cotton and Delapre Community Council and Council is now being asked to both consider and then decide whether to adopt the recommendations set out below with the background information contained in the enclosed report marked as Appendix A:

1. Guildhall

- The old part of the Guildhall (Town Hall) is the recommended headquarters for Northampton Town Council.
- The tenure recommended is to be a long leasehold let on an internal repairing basis.
- The recommended rent is a peppercorn but the costs for maintenance and services will be recharged based on a fair proportion.
- The lease is subject to detailed negotiations between the Town Council and the West Northampton Unitary Council to agree the exact terms, including for instance defining the common parts, service charge services, any break options, etc.
- Both parties to pay their own professional fees including legal costs.

2. Far Cotton Recreation Centre and Playing Field

- The recommended headquarters for the Parish Council is space in Far Cotton Recreational Centre. • The property is let with rental income generated for Northampton Borough Council; this will pass to West Northamptonshire Unitary Council.
- It is recommended that the Parish enters into negotiations with West Northampton Unitary Council to transfer the recreational centre and playing field from the Unitary to the Parish.
- Any transfer would be subject to detailed negotiations between the Community Council and the West Northampton Unitary Council to agree the exact terms.
- Both parties to pay their own professional fees including legal costs.

3. Kingsthorpe Community Centre and the Pastures Community Centre

- It is recommended that the Parish will use space in both of these Centres, which are let to community organisations on internal leases.
- It is recommended that the Parish enters into negotiations with West Northampton Unitary Council to transfer these community centres from the Unitary to the Parish.
- Any transfer would be subject to detailed negotiations between the Parish Council and the West Northampton Unitary Council to agree the exact terms.
- Both parties to pay their own professional fees including legal costs

4. This is an enabling measure which has to be agreed to allow the transfer of assets, if that is what the Community and Parish Councils of Far Cotton & Delapre and Kingsthorpe and the Northampton Town Council choose. It is not a commitment to transfer. Commitment to transfer will be the second step. This will be the decision of the Community, Parish and Town Councils, whereupon more detailed work will be conducted by them, looking at feasibility, governance and cost.

3 Issues

- 3.1 Council will note that the report enclosed as Appendix A to this present report provides the necessary background information for the recommendations put forward for Full Council's consideration. Council will also appreciate the necessity of entering into discussions with the Shadow Unitary Authority on all the cited asset transfers and that once Council has made its decisions this evening the said discussions should take place as soon as possible. Certainly, the hope is that these matters can be resolved by the 31st. March 2021.
- 3.2 The additional Recommendation in 2.2 above seeks delegated power for the Chief Executive in consultation with the whole of the Cross Party Working Group on any matter that may require a rapid decision except where it is considered that such an issue would better merit a decision by Full Council

4. Implications (including Financial Implications)

- 4.1 The Council's policy is to create three new councils to give greater representation and a stronger voice to all its citizens in the issues and concerns that will arise in our communities in the future.

5 Resources and Risk

- 5.1 The issue of costs is being monitored by the Cross-Party Working Group.

6 Legal

- 6.1 There are no legal implications at this stage except the need to comply with requisite legislation

7 Environmental implications

- 7.1 None at this stage.

8 Other Implications

- 8.1 None at this stage.

9 Background Papers

- 9.1 As enclosed.

George Candler
Chief Executive



Report for the Cross Party Working Group Asset Review for the New Councils

Executive Summary

This information in this report was produced for discussion at the Cross Party Working Group meeting on 2nd December 2020.

Northampton Town Council, Kingsthorpe Parish Council and Far Cotton and Delapre Community Council require a base for their fiduciary and civic functions.

This report considers those properties, the options for tenure with matters of note for each option. Following discussion on these options last week the recommendation is confirmed as below:-

Recommendation

It is recommended that the new Councils when constituted enter into discussions with the West Unitary Northamptonshire Council to take forward the following proposals:-

1 Guildhall

- The old part of the Guildhall (Town Hall) is the recommended headquarters for Northampton Town Council.
- The tenure recommended is to be a long leasehold let on an internal repairing basis.
- The recommended rent is a peppercorn but the costs for maintenance and services will be recharged based on a fair proportion.
- The lease is subject to detailed negotiations between the Town Council and the West Northampton Unitary Council to agree the exact terms, including for instance defining the common parts, service charge services, any break options, etc.
- Both parties to pay their own professional fees including legal costs.

2 Far Cotton Recreational Centre and Playing Field

- * The recommended headquarters for the Parish Council is space in Far Cotton Recreational Centre.
- * The property is let with rental income generated for Northampton Borough Council, this will pass to West Northamptonshire Unitary Council.

- * It is recommended that the Parish enters into negotiations with West Northampton Unitary Council to transfer the recreational centre and playing field from the Unitary to the Parish.
- Any transfer would be subject to detailed negotiations between the Town Council and the West Northampton Unitary Council to agree the exact terms.
- Both parties to pay their own professional fees including legal costs.

3 Kingsthorpe Community Centre and the Pastures Community Centre

- It is recommended that the Parish will use space in both of these Centres, which are let to community organisations on internal leases.
- It is recommended that the Parish enters into negotiations with West Northampton Unitary Council to transfer these community centres from the Unitary to the Parish.
- Any transfer would be subject to detailed negotiations between the Town Council and the West Northampton Unitary Council to agree the exact terms.
- Both parties to pay their own professional fees including legal costs.

Northampton Town Council – The Guildhall (Town Hall)

The oldest part of the Guildhall, was called the Town Hall (although not the original Town Hall for Northampton) and was constructed circa 1860s with the West Wing extended in the same Gothic revival style between 1889 – 92. In 1992 a stone and part brick extension to the Guildhall was built providing additional offices as a back-office function to the Town Hall. The accommodation is over 6 levels with basement car park.

On the 1st April 2021 the property ownership will transfer to the West Northamptonshire Unitary Council (WNUC). The property will remain in public sector ownership, and consideration is therefore given to the use and ownership options available for the Town Council.

To understand the options for the Town Council it is important to fully understand how the Guildhall, both the old part and the newer office addition, are connected, and from there to assess whether they can be disconnected from each other in the short term.

Reports reviewed by the Corporate Asset Manager include historical plans, maps, title plans, construction project records of the 1992 extension and condition surveys. Further information has been obtained from professional surveyors including valuation and building surveyors, and the Guildhall Facilities Manager.

Current Operations

The Guildhall building(s) are adjoined, in 1992 modifications to the fabric of the old part were made to unite it to the new construction, creating one integral unit for Northampton Borough Council to base its operational headquarters.

The old part of the Guildhall, the Town Hall, accommodates Council meetings, Cabinet Offices, Member meeting rooms, and provides space for civic functions, events, weddings, receptions. It includes an area for storage and accommodates the following facilities for the whole of the Guildhall:-

- The central heating boilers, pumps and operating plant, the system heating hot water piped throughout the property.

- Lift operating plant rooms.
- CCTV systems & Security, including operation of the car park, access control, panic alarm monitoring equipment.
- Archived storage material.
- Backup power supply generators.
- IT server equipment accommodated in a server room.
- Fire Alarm detection and egress for emergency purposes.

The historic rooms accommodate Civic services, the County Registrar leases part of the space and the Grand Hall is regularly used for weddings, with bookings committed until 2023. Wedding parties are frequently seen using the Courtyard and use the heritage of the property as a backdrop for photos of the occasion.

The old part of the Guildhall has experienced lots of changes in building trends and did not survive unscathed from the period when liberal use of asbestos was used as an insulating and fire resisting material. There has been some remediation of asbestos over the years, but there remains significant areas of asbestos in this part of the property, encapsulated and managed. The capital project to replace obsolete boilers will see the new boilers placed in a new area of the basement, the existing area unsafe to access and the removal of asbestos costs would be excessive.

Modern day compliance monitoring requires corporate organisations to have Fire Safety Detection equipment as part of the premises safety strategy and the fire safety systems, the fire risk assessment and evacuation strategy are combined across the whole of the Guildhall for the safety of occupants. Water Hygiene regulations for shared water supplies such as the system in the Guildhall, gas safety regulations, electrical standards and energy performance measures, all combined and managed by professional staff. The emergency plan, including egress in the event of a suspicious package, use shared egress staircases.

The Utilities serve the whole premises, and there is one charge for business rates, currently set at £203,383 pa.

Facilities

Discussions with the Facilities Manager of the Guildhall confirm that many of the services provided for the building are under contract with lead in termination clauses which vary in length, for instance catering.

Additionally, a new Building Management System is being procured for the building, to improve zoning and energy efficiency, it is understood that the Museum extension project included a requirement to connect into this new BMS system.

The Facilities Manager also wants the Committee to note that the Marriage Licence and Sale of Alcohol Licences are personal to the Facilities Manager.

At present the Facilities Manager operates the income generating aspects of the Guildhall, the wedding, fairs and events support a balanced budget, and the Service employs the expertise to deliver these services.

Repairs and Maintenance Costs

The repairs and maintenance team manage both project and routine maintenance work to the building and statues. They do this using a team of experts who are procured as part of a maintenance plan and capital project requirements.

A guide to previous maintenance running costs over the recent past and the current works programme is below:-

- Capital Works Programme – Allowance of Roof Old Part £500,000 Boilers £350,000
- Revenue Costs for routine maintenance - April 2018 to Nov 2020 - £46,000.

Two condition surveys are held on file.

In 2011 Faithfull and Gould completed the first condition survey which estimated the cost of works for the building fabric, mechanical and electrical maintenance at £2.457 million over the period of ten years.

Ridge Condition Survey completed a follow up in 2019 and estimated an allowance of £4.498 million for building fabric, mechanical and electrical maintenance over the next 10years,

These figures are a guide, they do not include an allowance for inflation, preliminaries, profits, overheads or professional fees. The works identified are planned maintenance works, there is no allowance for the external statues, reactive works costs or statutory property compliance.

Accommodation Options

The information below explains the potential options for the Guildhall, these have not been discussed with the Shadow Unitary authority and any chosen option would be subject to consultation and conditional of formal approval processes for both Councils.

As outlined above, the Town Hall part of the Guildhall is not a freestanding building; under the current configuration it is unable to be split, therefore the options consider the property as a whole.

- (1) The Town Council could enter into an informal arrangement with West Northamptonshire Unitary Council, such as a licence for use of areas of the Town Hall. This would be a shortterm arrangement while the details of the longer-term agreement are finalised.
- (2) The Town Council may consider an internal repairing lease of the Town Hall part of the Guildhall. The lease would be a head lease, with the Registrar area an undertenant of the Town Council (as their lease falls within the old part of the building).

The lease would be medium to long term, at a peppercorn rent but with a comprehensive service charge schedule setting out the shared services to be provided by WNUC and the fair apportionment of the costs of these shared services recharged across both Councils.

Having the services documented in the lease provides certainty and clarity for both parties for budget purposes. The rules on service charges are regulated, a service charge cannot make a profit, it is a mechanism to pass through costs, but the administration costs can include staff costs and management fees reasonably incurred. The services provided by the landlord would include:-

- Fabric maintenance to structure, roof and common parts including the car park
- Maintenance of mechanical and electrical fixtures and fittings (Lifts, wiring, plumbing)
- Insurance, Utilities and Business rates (where these cannot be apportioned by direct charge)

- Compliance Management (Fire Safety, Water Hygiene, Asbestos, Emergency Plan)
- Cleaning (Waste management, gritting, window cleaning)
- Security (24 hour call out, security staff, alarms)
- Site Management Costs (Post, Printers, IT etc)
- Major Works (Project)
- Major Works (Reserves)

Having a clearly defined service charge would provide comfort to the Town Council that the services will be provided from day one, but it can be varied by agreement between the parties as the functions evolve.

The Service Charge for the Guildhall would be significant due to the type of property it is, below is a guide showing the sums that would be paid for different cost scenarios and is provided for discussion.

Indicative Cost of Services For Building	Town Hall		Guildhall Office	
Total Sum of Costs pa	Size sq ft		Size sq ft	
	25435.1203		43905.99052	100%
	37%	psf	63%	psf
£100,000	£36,681.15	£1.44	£63,318.85	£1.44
£150,000	£55,021.73	£2.16	£94,978.27	£2.16
£250,000	£91,702.89	£3.61	£158,297.11	£3.61
£350,000	£128,384.04	£5.05	£221,615.96	£5.05
£500,000	£183,405.77	£7.21	£316,594.23	£7.21
£1,000,000	£366,811.55	£14.42	£633,188.45	£14.42

Capital Costs

As mentioned above some major works can be paid through a service charge, but others, improvements or significant costs will be outside of the scope of a service charge. WNUC as the landlord would be responsible for the roof and fabric of the building, including the statues. There is potential for grant funding, borrowing or obtaining capital receipts through a phased programme of disposals. If the lease is internal and repairing only, the responsibility for the fabric and structure, M&E and all the retained facilities, will remain with WNUC not the Town Council.

Finance

Accommodation in a Grade II Listed* Building is not cheap. However, if Northampton residents want to keep the Town Hall as a Civic Building then money to do so will need to be paid partly by council tax(s) and partly by the Council's other methods of obtaining income.

The council tax collection of money for accommodation will either be in the WNUC or the Town Council apportionment, if it is in the Town Council apportionment it will be spent in Northampton and the money certain for the property, if it is collected through the WNUC council tax, it may be spent anywhere in the Unitary Boundary.

It is possible by agreement to negotiate a service charge cap, but whoever occupies the Guildhall Office will not expect to pay the Town Hall Service Charge capped costs. If there is a cap between the Councils, then this will be identified in the service charge budget, and any the incoming occupier tenant will not pick up the subsidy.

However, all are asked to note that finances should be looked at in conjunction with the other strategy for the Town Council, there are income opportunities (weddings, events, corporate lettings) and therefore the accommodation costs do not have to be paid just out of the precept, income earned on the facility, can be used to offset operating costs such as accommodation.

- (3) Another option is a freehold transfer of the whole of the property, both parts of the Guildhall transferring to the Town Council. This would resolve the issues of shared services, the Town Council would however as Freeholder be responsible for all costs, maintenance, professional fees, statutory compliance etc., as opposed to just an apportionment of them as suggested through the lease mechanism. But it would have the benefit of being able to sublet the office space for rental purposes to generate income to support some of those costs.

The Town Council would be required to follow the public sector disposal and procurement laws governing disposals (eg lettings over 7 years is defined as a disposal under the LGA 1972 Act), procurement of contracts (such as maintenance), health and safety and property compliance. The Town Council would be responsible for management of the building and all other responsibilities that come with ownership of a corporate building, including insurance, business rates, utilities, energy performance management etc.

The Town Council would need to factor in costs for professional advisors and technical experts for the complex building management system, M&E and Fabric maintenance. A predetermined strategy and operating model for the property in its entirety would be recommended to be agreed before any transfer to facilitate budget setting and operational management.

If the Guildhall freehold is transferred the practical side of delivering this transfer are significant and the costs would fall to both the Town Council and the Unitary to complete the transfer, this would take some time to deliver, it would not be possible for the next financial year.

Matters of consideration would be employment rights (TUPE for the facilities team that work in the building) repositioning of the IT servers that serve NBC staff working remotely, supplier contracts for assignment or termination (many are linked to wider procurement contracts for example water hygiene management) etc.

The costs of the freehold transfer would be considerably more than the option of an internal repairing lease.

West Unitary Northampton Council

A licence to occupy is the simplest and quickest way to accommodate the newly created Town Council.

But if the Town Council do wish to proceed with an internal repairing lease, the Unitary Council as Landlord, will require a resolution to protect their interests in the Guildhall Office, to mitigate costs and ensure that they have flexibility to determine the use of the retained Guildhall Office at reasonable cost. A solution for the Town Hall accommodation should work for both parties and initial discussions with the WUNC confirm they would want to negotiate the lease terms direct with the Town Council and assume that the Town Council would share a business plan as part of these discussions.

Any shared service occupier of the Guildhall Office will want to know the costs they will pay for office accommodation, they will consider the rent quoted and the service charge cost when making their decision. Whilst the building is intrinsically united by the services, it is extremely important for the Unitary to have these figures available for decision making, for instance, when considering accommodation options for letting to partners. The Unitary will require a sustainable solution for the office accommodation. By setting out the terms clearly in a lease, it also promotes a sustainable Town Hall.

If a freehold of the whole of the Guildhall is preferred, then the parties would need to agree the price and practical issues mentioned under option 3 above.

Far Cotton & Delapre Council

The Far Cotton Recreational Centre and the surrounding field are of interest for Council functions. The earlier report on assets gave an overview on the types of assets the Council holds, categorised as community, investment, operational etc.

This property comprises a modern detached two storey building built in the early 2000's. The property provides accommodation for a community library, a doctors surgery, pharmacy, changing rooms and a community hall. Externally there is a tarmac car park with up to 28 parking spaces and 6 disabled spaces.

The property is fully occupied under leasehold interests, it is not classified in NBC accounts as a community asset, the income generated in rent is about £68,000, the capital value circa £375,000. Northampton Borough Council operate a service charge, the Council providing shared services and recharging the costs to the tenants.

The adjacent playing field is maintained by the Council grounds maintenance contract.

The options are:-

- (1) The freehold could be disposed by the WNUC to the Parish Council

The transfer process for an asset would involve a process of:-

- The Unitary Council agreeing the asset is surplus and to dispose of the asset to the Parish Council.
- The value of the sale would be at least the book value but a market valuation would be required.
- The Unitary Council and the Parish Council would need to agree a price and the reasoning for the agreed price if it is less than market value with documented judgement subject to audit.

The income from the asset would be lost to the Unitary and this would need to be considered as part of the ongoing budget management plan.

(2) The Parish Council could use part of the space by agreement with one of the tenant areas.

Northampton Borough Council staff could assist with facilitating these discussions. A licence fee would be paid for use of the area which would be of minimal cost to the Parish Council

Kingsthorpe Parish Council

Kingsthorpe Community Centre

- (1) Kingsthorpe Community Centre (Thornton Hall) is one property of interest to the new Parish Council, it is let to Community Spaces Northampton (CSN). A management agreement between CSN and NBC, and grant funding, supports the delivery of community services in the area. The lease is one of several that forms part of the management agreement with CSN and legal advice would need to be obtained on the mechanisms for transfer of the asset to the Council.
- (2) If ownership of the property transferred to the new Parish Council, they would be responsible for the landlord obligations, which include the external repairs and maintenance of the building, any grounds, and the internal structural walls and replacement of fixtures and fittings.
- (3) Any use of the hall would be by way of negotiation with Community Spaces Northampton.

The Pastures Community Centre

The Centre is also let on a long leasehold, supported by a management agreement to the local community organisation that operate the Centre. The terms are consistent with the CSN lease, the tenant pays rent to the Council who in return granted an internal repairing lease, the Council retaining responsibility for the structure, outside spaces and car park. The car park will require resurfacing in the medium term.

Any transfer would see the Parish taking on the Landlord repairing obligations and any use of the hall would be by way of negotiation with the tenant, the same principles as Kingsthorpe.

The Obelisk, Kingsthorpe, was mentioned, as being of interest, it is not in NBC ownership, the ownership details are not known.

