Northampton Local Plan Part 2
Regulation 18

Consultation Statement
April 2019
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1 OVERVIEW OF THE CONSULTATION

Introduction

1.1 Northampton Borough Council is preparing a Local Plan Part 2 for the administrative boundary of Northampton. This Plan will conform to the strategic policies contained in the adopted West Northamptonshire Joint Core Strategy Local Plan Part 1 (2014).

1.2 Once adopted, the Northampton Local Plan Part 2 will form part of the Development Plan for Northampton. It will be the starting point for the consideration of all future pre-application inquiries, planning applications and appeals within the Borough alongside the West Northamptonshire Joint Core Strategy, any made Neighbourhood Plans and the Government’s National Planning Policy Framework.

What is a Local Plan?

1.3 Each local authority is required by the government to prepare a Local Plan to set out the strategy and planning policies to guide the development and future uses of all the land within its area.

1.4 The Council’s key objective is to develop and adopt a robust Local Plan Part 2 that takes into account national planning policy, regional considerations, and public opinion at the local level. The Plan must also stand up to scrutiny at its public examination and provide the Council with a strong planning policy framework that will enable it to meet the need for housing and other development in the future whilst protecting Northampton’s unique environment.

1.5 The Northampton Local Plan Part 2 will:

- Provide local and more detailed policies for the Borough that are not already the subject of the strategic policies contained in the adopted West Northamptonshire Joint Core Strategy (2014)
- Supersede the policies contained within Northampton Borough Council’s adopted Central Area Action Plan (2013)
- Replace the remaining ‘Saved Policies’ which are currently contained within the adopted Northampton Local Plan (1997)
- Contain a set of up to date development management policies including site specific policies to assist in the determination of future planning applications and appeals, and to inform pre-application discussions
- Identify sites for new development including for the provision of housing, jobs, retail, and community uses
- Highlight and identify new and existing areas that require protection and / or enhancement including the historic and natural environment

Legislative Requirement

1.6 The legislative requirements for the production of a Council’s Local Plan are set out in the Town and Country Planning (Local Planning) (England) 2012 Regulations.
1.7 This consultation statement complies with the requirements of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Northampton Borough Council’s Statement of Community Involvement (2017). The Council’s Statement of Community Involvement sets out how the Council will engage with the community, businesses and other organisations and stakeholders in the production of planning documents and planning applications.

Sustainability Appraisal

1.8 The Council is required to carry out a Sustainability Appraisal of the proposals set out within a Local Plan. This is set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and the appraisal incorporates the requirement of the Environmental Assessment Regulations / Strategic Environmental Assessment Regulations / European Directive 2001/42/EC.

1.9 A Sustainability Appraisal Report will accompany the new Northampton Local Plan Part 2 which will consider all of the likely significant effects that the Local Plan Part 2 may have on various environmental, economic and social factors.

1.10 Sustainability Appraisal work has been carried out throughout the preparation of the Local Plan. From 27th April 2016 to 10th June 2016, a Sustainability Appraisal Scoping Report accompanied the Local Plan Part 2 Issues Consultation. From 21st September 2016 to 2nd November 2016, a Sustainability Appraisal accompanied the Local Plan Part 2 Options Consultation. The Sustainability Appraisal of Site Options accompanied the Sites Consultation in September 2017.

Context of Consultation Statement

1.11 This Consultation Statement sets out how Northampton Borough Council has undertaken various forms of consultation to date in preparing the Northampton Local Plan Part 2. This document sets out the following:

- Who was invited to make representations
- The methods by which they were invited to make representations
- A summary of the main issues raised by the representations, and
- How these representations have been addressed in the production of the Local Plan moving forward

The ‘Duty to Cooperate’

1.12 Section 33A (1) and (3) of the Planning and Compulsory Purchase Act 2004 (as amended) places a duty on a local planning authority to co-operate with other local planning authorities and other prescribed bodies when it undertakes certain activities. This includes the preparation of development plan documents, activities that can reasonably be considered to be preparation for such documents and activities that support such preparation so far as they relate to a strategic matter. This is to maximise the effectiveness with which those activities are undertaken.
1.13 Section 33A (2) requires a local planning authority “to engage constructively, actively, and on an on-going basis” in respect of the activities that are subject to the duty.

1.14 The local planning authorities that border Northampton Borough Council are:

- Borough Council of Wellingborough
- Daventry District Council
- South Northamptonshire Council

1.15 Northampton also falls within the area of Northamptonshire County Council.

1.16 Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the other prescribed bodies for the purpose of implementing section 33A of the 2004 Act. The Statement of Community Involvement lists the bodies that are considered relevant to Northampton Borough Council. Full details of how the Council has engaged with those bodies will be set out through the Council’s supporting ‘Statement of Compliance’.

**Overview of Local Plan Part 2 Consultations**

1.17 In line with the legislative requirements and the Council’s Statement of Community Involvement (2017), the Council has sought to actively engage the community in the production of the Northampton Local Plan Part 2.

**Preparation of Evidence Base and Seeking Initial View**

1.18 To inform and produce the Northampton Local Plan Part 2, the Council has undertaken a significant number of specialist studies in order to collate the evidence base to inform the contents. This work involved the commissioning and completion of the studies as well as engagement with key stakeholders, organisations and groups across the borough. Full details of the Local Plan Part 2 public consultation documents and evidence based studies can be found on the following website. [www.northampton.gov.uk/lp2proposedsubmission](http://www.northampton.gov.uk/lp2proposedsubmission)
2 ISSUES CONSULTATION (REGULATION 18)

2.1 Northampton Borough Council’s Cabinet meeting held on the 13th April 2016, agreed that the first stage of public consultation on the draft Northampton Local Plan Part 2 known as the ‘Issues Paper’ could be undertaken. The Issues Paper was approved alongside the Consultation and Engagement Strategy and a copy of the report can be found on the Council’s website, on the following web link. https://www.northampton.gov.uk/info/200205/planning-for-the-future/2267/northampton-local-plan-part-2-issues-consultation

2.2 The first stage public consultation on the Local Plan Part 2 commenced on Wednesday 27th April 2016 and closed at 5pm on Friday 10th June 2016. The consultation focused on the scope of the Plan and the key issues that it should address. This six week period included two days to compensate for the two May Bank Holidays (2nd May 2016 and 30th May 2016).

2.3 The consultation was split into two sections (Issues for the Local Plan Part 2 and the Land Availability Assessment). Views were sought on the following documents / parts of the Plan:

- Northampton Local Plan Part 2 – Issues Paper (including a Partial Review of the Northampton Central Area Action Plan)
- Sustainability Appraisal Scoping Report
- Northampton Borough Council’s Draft Statement of Community Involvement
- Land Availability Assessment – Draft Methodology
- The Call for Sites

2.4 The Council produced a Comments Form alongside a set of Guidance Notes to accompany the Issues Consultation Paper, the Sustainability Appraisal Scoping Report and the Draft Statement of Community Involvement.

2.5 All of the above documentation can be found on the Council’s website through the following link: https://www.northampton.gov.uk/info/200205/planning-for-the-future/2267/northampton-local-plan-part-2-issues-consultation

Availability of consultation documents

2.6 Table 1 outlines where the Local Plan Part 2 Issues consultation documents were available to view.

<table>
<thead>
<tr>
<th>Website</th>
<th>On the Council’s online consultation portal.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council Offices</td>
<td>At the Guildhall One Stop Shop at Northampton Borough Council, St Giles Square, Northampton NN1 1DE.</td>
</tr>
<tr>
<td>Libraries</td>
<td>At all the libraries in Northampton Borough.</td>
</tr>
</tbody>
</table>
Abington
Duston
Far Cotton
Hunsbury
Kingsthorpe
Northamptonshire Central Library
St James
Weston Favell
Wootton Fields

<table>
<thead>
<tr>
<th>Email</th>
<th>Copies of the consultation documentation could also be requested by emailing the Council’s Planning Policy Team.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Writing</td>
<td>Copies of the consultation documentation could also be requested by writing to the Council’s Planning Policy Team.</td>
</tr>
<tr>
<td>Translated documents</td>
<td>Copies of translated or other formats of the consultation documents could be requested via the Council’s Translating and Interpreting services.</td>
</tr>
</tbody>
</table>

Who was invited to make representations to the Local Plan Part 2 Issues Consultation?

2.7 A comprehensive consultation database was used to invite individuals and organisations to take part in the Local Plan Part 2 Issues consultation. The database comprised of residents, elected representatives, community and voluntary groups, developers and businesses, infrastructure providers, government agencies and other prescribed bodies (as detailed in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. As the Plan has progressed, the database has been updated and expanded with individuals and organisations that wish to be formally kept informed.

How were consultees invited to make representations to the Local Plan Part 2 Issues consultation?

2.8 The Council contacted every organisation, business and individual on its electronic database which included the specific statutory bodies as listed in the Town and Country Planning (Local Planning) (England) Regulations 2012. Details of how they were contacted is in Table 2. Examples of materials used to notify individuals and organisations of the consultation can be found in Appendix B.

Table 2 – Methods of inviting consultees to take part

<p>| Statutory Consultees | Letters and email notifications explaining the Issues consultation and providing details of how to respond were sent to all statutory consultees as listed in the Town and Country Planning (Local Planning) (England) Regulations 2012 including specific consultation bodies, the general consultation bodies, neighbouring local authorities and prescribed bodies. |</p>
<table>
<thead>
<tr>
<th>Non Statutory Consultees</th>
<th>Letters and email notifications were sent to non-statutory consultees who had requested to be on the Borough Council’s Local Plan Part 2 database.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council Website with an on-line Corporate response facility</td>
<td>All the information about the new Local Plan Part 2, and an explanation on the Issues consultation, and the related documents was published on the Council’s website.</td>
</tr>
<tr>
<td>Social Media</td>
<td>The Issues stage consultation was published on the Council’s Facebook Page and Twitter Page / Feed.</td>
</tr>
<tr>
<td>Press Release</td>
<td>The Council published two press releases. One was published before the papers were published for Cabinet which was held on 13th April 2016. A second press release was published just before the start of the public consultation period. A copy of these press releases is included in Appendix A.</td>
</tr>
<tr>
<td>Inspection Locations</td>
<td>All consultees were made aware that consultation documents were available to view at the following locations: Council’s One Stop Shop which is located at the main council offices at the Northampton Guildhall, St Giles Square, Northampton NN1 1DE. All libraries in Northampton Borough.</td>
</tr>
<tr>
<td>Consultation Leaflets</td>
<td>Leaflets were distributed to: all the Borough Councillors Libraries in Northampton Borough Parish Councils Neighbourhood Forums All GPs Major Supermarkets All community centres in the Borough.</td>
</tr>
</tbody>
</table>
| Consultation Banners | In addition to the paper copies of the consultation documents, consultation Banners which advertised the Issues consultation were placed at the following locations:  
  - The Council’s One Stop Shop at the Northampton Guildhall  
  - Kingsthorpe Library  
  - Western Favell Library  
  - Wootton Community Centre  
  - Duston Community Centre |
<p>| Workshop for Borough Councillors | All Northampton Borough Councillors were invited to attend a workshop which was held on 3rd May 2016 in order to receive a briefing on the preparation and consultation process of the Draft Northampton Local Plan Part 2 Issues Consultation and to discuss the issues identified in the consultation documentation. |
| Workshop for Parish Councils and | The Council held a workshop on 4th May 2016 for all Parish Councils and Neighbourhood Forums located within Northampton Borough. This was to provide a briefing on the preparation and consultation process of the Draft Northampton |</p>
<table>
<thead>
<tr>
<th>Neighbourhood Forums</th>
<th>Local Plan Part 2 Issues Consultation and to discuss the issues identified in the consultation documentation.</th>
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</thead>
<tbody>
<tr>
<td>Drop In Session with the Planning Policy Team at the One Stop Shop at the Northampton Guildhall</td>
<td>On the afternoon of 18th May 2016 the Northampton Borough Council’s Planning Policy Team were available at the Council’s One Stop Shop located within the Guildhall to answer any questions about the Draft Northampton Local Plan Part 2 Issues Consultation and related documentation.</td>
</tr>
<tr>
<td>Employment Workshop with Property Agents and Developers</td>
<td>The Council held a workshop on 25th May 2016 to focus on generating participation from property agents and developers to input into the Employment Land Study, which will inform the Local Plan. This workshop also provided the opportunity to discuss issues identified in the Issues Consultation Paper and encourage participation in the Local Plan Part 2 production and consultation process.</td>
</tr>
<tr>
<td>Meeting with Organisations</td>
<td>During the public consultation period, the Council’s Planning Policy Team met with various organisations to discuss the Draft Northampton Local Plan Part 2 Issues Consultation. Meetings were held with the following organisations:</td>
</tr>
<tr>
<td></td>
<td>• SEMLEP (South East Midlands Local Enterprise Partnership)</td>
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<tr>
<td></td>
<td>• Environment Agency</td>
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<tr>
<td></td>
<td>• Anglian Water</td>
</tr>
<tr>
<td></td>
<td>• Northampton Town Centre BID (Business Improvement District)</td>
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<td></td>
<td>• Brackmills BID</td>
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<tr>
<td></td>
<td>• Northamptonshire County Council</td>
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<tr>
<td></td>
<td>• Daventry District Council</td>
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<td></td>
<td>• South Northamptonshire Council</td>
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2.9 Consultees were able to comment on these consultation documents by the following methods:

- Via the Council’s online comments form on the Council’s website
- Via email to the Council’s Planning Policy Team
- Through a specially designed online survey via Survey Monkey
- Via post to the Planning Policy Team at Northampton Borough Council, The Guildhall, St Giles Square, Northampton, NN1 1DE

Stakeholder responses to the Northampton Local Plan Part 2 – Issues Consultation

2.10 A total of fifty two representations were made to the Northampton Local Plan (Part 2) Issues Paper, the Sustainability Appraisal Scoping Report and the Statement of Community Involvement.

2.11 A copy of these consultation responses can be viewed on the following Council web page.
2.12 The 52 representations to the consultation were made by the methods outlined in Table 3. Table 4 contains details of recorded visits to the website and hits on social media.

**Table 3 - Summary of how responses were received**

<table>
<thead>
<tr>
<th>Method of Response</th>
<th>Number of Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Council’s Corporate Website via Survey Monkey</td>
<td>12</td>
</tr>
<tr>
<td>Written comments</td>
<td>26</td>
</tr>
<tr>
<td>Comment Form</td>
<td>13</td>
</tr>
<tr>
<td>Not Duly Made i.e. received after the consultation deadline</td>
<td>One response was not duly made as it was received after the consultation deadline. The response has been included in the summary of consultation responses but is clearly marked as not duly made.</td>
</tr>
</tbody>
</table>

2.13 Of the 52 responses received, 51 were received electronically via email or through Survey Monkey and 1 was received by post.

**Table 4 – Other information**

<table>
<thead>
<tr>
<th>Information Source</th>
<th>Recorded Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council’s Corporate website</td>
<td>553 recorded visits</td>
</tr>
<tr>
<td>Council’s Twitter feed</td>
<td>8248 received the information via Twitter</td>
</tr>
<tr>
<td>Council’s Facebook page</td>
<td>4358 received the information via Facebook</td>
</tr>
</tbody>
</table>

Key Issues arising from the Northampton Local Plan Part 2 – Issues Consultation

2.14 To comply with the regulations governing the preparation of local plans the Council has outlined in this statement the key issues raised in the representations made to the first stage of consultation.

2.15 Summary of the key points from the Issues Consultation:

- A need to identify more sites to deliver the identified requirement for new homes and to maintain the five year housing land supply
- A need to ensure that allocated sites are available and deliverable in the short term
- The importance of providing a more balanced mix of family and other housing, including in the town centre
A need for employment land that is suitable for particular sectors, such as large scale logistics and distribution sites and also for small scale offices and businesses

A need to deliver infrastructure to support the town’s growth, including the Northampton Northern Orbital Route and the Northampton Growth Management Scheme and to encourage other modes of transport

A need for the town centre to evolve to become a destination to attract visitors and to increase dwell time in the town centre, with a mix of destination and independent shopping, workplaces, culture and cafes

An opportunity to improve the Market Square to reflect its historical significance and to enhance the market

The importance of the Cultural Quarter and the opportunity to contribute to a distinct sense of place within the town centre

A need to protect the historic environment

A need to update the Strategic Flood Risk Assessment for Northampton

How representations were addressed in taking the Local Plan Part 2 forward

2.16 To comply with the regulations governing the preparation of local plans the key issues raised through the Local Plan Part 2 Issues Consultation were considered and, where appropriate, either included or assessed through the next stage of the Local Plan preparation. In some cases new evidence needed to be gathered and further clarification on points raised were sought.

Issues Consultation - Summary of Responses

Question 1 – What are the main issues relating to housing delivery, mix and affordability which the Local Plan Part 2 should consider? The Local Plan Part 2 will not be reviewing the number of new homes that is already identified in the adopted Joint Core Strategy.

2.17 There were 27 respondents to question 1. This question generated the highest number of responses and the key messages were:

a) Strategic housing requirements and the five year housing land supply

There is a general consensus that there is a need to identify sites in the Local Plan Part 2 for housing if the housing target of 18,870 over the plan period is to be met. A comment was made that this figure should be seen as a minimum. There is also a comment about the need to consider how the Northampton Related Development Area (NRDA) housing need will be met (in conjunction with neighbouring authorities). There is also an emphasis by a few respondents on the importance of continued joint working between Northampton Borough Council, Daventry District Council, South Northamptonshire Council and the Borough Council of Wellingborough to secure the delivery of the NRDA housing figures. The Local Plans should include a robust development framework to implement growth in Northampton, whilst at the same time address the matter of accommodating growth in and beyond the NRDA boundary. A suggestion was made in terms of preparing a joint study to consider the capacity of the NRDA and options for additional growth. Another comment referred to the need
for the Borough Council to explore all options to accommodate its need within its boundaries, maximising the use of brownfield land.

There are several references to the lack of a demonstrable 5 year housing land supply and the need for flexible policies to kick start housing delivery. There is a need to deliver the right homes in the right places, meeting people’s needs and integrating the Sustainable Urban Extensions (SUEs) into the wider area. Comment was made on providing a clear direction for growth/spatial strategy which signposts the need to exploit the full potential of allocated SUEs and that delivering housing in SUEs is one of the most sustainable options for delivering new developments. Reference was made to testing the capacity of the remaining land which has not received planning permission at south of Brackmills SUE and that increasing the quantum of housing in this SUE would also be a sustainable option.

b) Housing delivery and flexible policies

There was a comment that many new homes will be delivered on small and medium sized sites. The Local Plan Part 2 must identify a range of smaller sites both within and adjoining the Borough boundary and see if they are available and deliverable in the short term. If not, a full review of the West Northamptonshire Joint Core Strategy is required. A comment was made that historical completions and windfall sites should also be included when considering housing delivery. There is an overview that the policies formulated should be flexible and not create undue constraints as inflexible policies will impact on viability and deliverability. Flexibility is also required to secure the realisation of additional windfall sites, in addition to allocated sites, as there is a requirement for a variety of sites to come forward and within shorter time leads. Also, the Borough Council must proactively engage with the development sector to ensure that allocated sites are viable and deliverable.

A comment was made that housing mix and delivery should be considered on a site by site basis and not prescribed through inflexible plan policies.

c) Developer contributions, Community Infrastructure Levy and affordable homes

More certainty is required about the relationship between the Community Infrastructure Levy (CIL) and affordable housing delivery. There is also a comment on the need to consider recent Government Guidance on affordable housing, including starter homes, to restrict planning obligations and to not have any affordable housing on sites with less than 10 dwellings.

Comments were made about the definition of affordability in terms of what it is, what the percentage should be and how it is determined. Also, policy changes emerging at national level should also be taken into account in the new Local Plan Part 2. Any policies or definitions on “affordable”, should take into account rent to buy affordable housing.

One respondent considered there to be a housing crisis in Northampton and that building more houses cannot be assumed to resolve it. Also, the situation would get worse if new homes are provided with low levels of affordable housing. Recommendations were provided with regards to social housing/building enough
within a generation to meet all the needs/ refurbish and improve homes and estates/ and encourage people to start housing co-operatives. A comment was made about the size of the houses. A suggestion was given that there is a need to work out how many people cannot afford houses on the open market and set the requirement so that the equivalent number of homes are affordable.

The imposition of CIL combined with affordable housing targets will result in viability issues for developers and additional sites will be required to deliver affordable housing.

d) Infrastructure

Some respondents raised the issue of infrastructure and that their deliverability and associated costs are important. Other comments include queries on whether the roads could cope, and that drainage and highways need to be provided in full prior to dwellings being constructed. Reference was also made to the need for other infrastructure to be provided before the houses are occupied. In addition, there were comments associated with ensuring that appropriate sports facilities/ playing fields need to be provided to meet demand generated by the new developments and that evidence should be provided to show if new facilities/ upgrade of existing facilities are required. A question was asked as to what percentage of homes will have reasonable garden space. There is also a comment that there is a need to encourage more compact communities where cycling, walking and public transport are the norm and not cars.

e) Housing mix

Although there were separate questions on housing mix and houses in multiple occupation (HMOs) a variety of comments were made including the need to control houses in multiple occupation by restricting them and to cease the conversion of family housing. There was also a reference to former Council houses or social housing which have been let to multiple tenants. It was commented that these should be returned to their original use. Also, there should be more bungalows and the older population should have housing with full mobility access. One comment relates to the town centre, where there is a lack of a good mix of different types of housing to support a diverse community and that there are too many tiny flats and HMOs. It was suggested that balance is needed to restore and maintain vibrancy to regenerate the town centre and safeguard its heritage assets. In terms of the Central Area Action Plan a comment was made that a mix of houses is required to include affordable starter homes and family homes to help graduates develop careers in the area and make it an attractive place for young people to relocate to. It was suggested that more housing in the town centre could include work live units which can contribute to a thriving culture.

f) General Comments

Reference was made to the need to protect the historic environment and to obtain from developers sufficient data about the potential archaeology, heritage and historic buildings that the development plan will affect before any outline or full permissions are granted.
Comments were made about the reluctance of developers to use expensive brownfield sites and instead directing developments towards the countryside and the edge of urban areas.

Comments were also made in relation to the Growing Together Neighbourhood Plan which is being progressed. There were elements in the Plan which were considered relevant to this question including the need for new residential development to provide a mix of housing, maximise affordable homes and homes for social rent, and increase the availability of 1 and 2 bedroom homes. There is a preference for small scale developments on infill sites, redundant garage sites and low value/underused open space. Several brownfield sites are considered suitable for residential or other forms of development. These are the former Emmanuel Middle School, former Lings Upper School former Blackthorn Middle School and the former Silver Horse Pub site.

Comments were made in relation to the status of West Hunsbury and the need for the ambience and character of the area to be protected. Exceptions were provided which include underused green spaces like areas adjacent to Claystones in West Hunsbury which could be used for housing, sports facilities and so on.

Question 2 – Do you think that we need sites that can deliver new homes more quickly, in the short to medium term?

2.18 There were 16 respondents to question 2. The key messages were:

Several respondents answered yes to this question, and no one disagreed.

There were several respondents who commented that the housing policies should provide a framework to deliver the housing requirement and the 5 year housing land supply over the plan period, and that more houses/sites are needed and needed quickly. Some have expressed this with a degree of urgency. Failure to maintain a 5 year housing land supply could have adverse economic and social impacts. There could be a huge shortfall by the time the plan is adopted in 2018. Reference is also made to the need to identify sites so that the 5 year housing land supply can be maintained over the plan period. Additional sites are also required in the short to medium term to meet shortfall in the NRDA. Some referred to the fact that building rates need to be accelerated.

There is also consensus that allocations for residential development must be made and sufficient supply of deliverable sites is required to meet Northampton’s needs.

One respondent suggested a timescale of 2020 for the delivery of new homes.

One respondent referred to the Northampton South Sustainable Urban Extension which can contribute to sites within the short to medium term.

Some respondents have provided the same response to several questions including the response associated with housing crisis and social housing.

One respondent expressed concern that the Borough Council has commented on a number of applications recently suggesting that if permitted they could contribute to
the NRDA supply. This relates to the comment that there is a need to ensure sufficient supply of deliverable sites to meet Northampton’s needs. Another expressed concern that the Borough has no mechanism to meet its housing needs through sites that meet the definition of “deliverable”. If this undersupply continues, the Joint Core Strategy and the Local Plan Part 2 could be considered out of date when assessed against the National Planning Policy Framework. The respondent recommended that the Council should work proactively with adjoining authorities to identify suitable sites that fall within Northampton’s sub-housing market area.

One comment relates to the scope for early delivery on sites where there is early delivery of rent to buy affordable homes.

One comment relates to the need to ensure that new homes should not be delivered without infrastructure being planned and delivered. Reference to infrastructure includes a fully functioning and operational inner and outer orbital road systems to move traffic through and out of town effectively.

**Question 3 - Do you think that we need a mix of market housing e.g. family homes, housing for single households?**

2.19 There were 17 respondents to question 3. The key messages were:

All respondents agreed that a mix of housing is required. Key comments include the fact that affordable housing should be provided in accordance with national planning guidance and evidence base, not whims of developers to maximise revenue and profitability. Another referred to the need to have regard to the emerging Neighbourhood Plan. The housing mix should be designed through strengthened new build housing standards, and accord with principles of sustainable development and good design when considering locations.

There is a suggestion that a prescriptive mix should be avoided, allowing developers to provide a mix that their customers require. It was recommended that a site by site negotiation should be undertaken for affordable housing with the most appropriate mix applied to each site subject to viability and constraints. Another suggestion is that the mix should be informed by the Council’s Strategic Housing Market Assessment and relevant documents.

A range of mixed housing was recommended to provide a mixed balance for families/couples/single people/young, middle aged and old aged/renters and homeowners/variety of working backgrounds/long term and short term residents to the need for more flexible properties and larger executive/family homes away from the town centre and in peripheral locations. Some suggested that a balance is required to build stable and vibrant communities and others state that there is still a significant level of affordable needs that the Council will need to meet. Another commented that a shortage of affordable homes should not override the need for a mix of other housing like family homes and housing for single occupancy.

**Question 4 - Do you think that we need a mix of affordable housing e.g. affordable rent, social rent, shared ownership, Starter Homes?**
2.20 There were 18 respondents to question 4. However, some respondents have commented on the basis that Questions 3 and 4 are asking similar questions and do not necessarily distinguish between affordable housing mix and a mix of market housing. For this question, all agreed that a mix of affordable homes is needed and some added that this should be done in accordance with Government’s Framework. However, one respondent was uncertain as to whether the new Local Plan Part 2 will be the most appropriate document to prescribe the mix. If it is to be included in the Local Plan Part 2, then the mix should be for indicative purposes only and subject to negotiation on a site by site basis.

Similar to Question 3, there were comments that the mix should be driven by analysis and case studies and not developers. In other words, the appropriate mix should be based on evidence and not the requirements of developers. The mix should also be determined on the merit of each application. One comment referred to the need for the Borough Council to be strong and people driven. One respondent referred to the Growing Together Neighbourhood Plan and the need to maximise the proportion of homes to meet the needs of local families.

Comments were also made on the mix and “affordability” itself including:

- Shared ownership is a scam. The property should be owned or rented;
- Starter homes welcomed;
- Starter homes a valid form of affordable housing;
- Northampton is relatively affordable, but access to suitable accommodation to meet Northampton’s needs is limited;
- Affordable housing should be determined in relation to an appropriate multiplier or percentage of the national minimum wage;
- Provision of affordable housing is complex and there is no one size fits all solution;
- Housing crisis in Northampton – get to the root of affordability, build more social housing;
- Rent to buy affordable housing could boost site viability;
- As the University grows, there will be more demand for affordable housing. Demand also from people with low incomes who cannot afford to buy;
- There is a need to cater for all different situations. However, discounted homes in the definition of affordable homes is worrying because the financial incentive is a one off and only benefits first time buyers and not first time buyers of the future; and
- Emphasis should be on affordable rented homes

Question 5 – Is there evidence to support the Local Plan Part 2 introducing the optional national housing technical standards in relation to access and space standards?

2.21 There were 11 respondents to question 5. The key messages were:

Three respondents considered that introducing the standards into the LPP2 would be a good thing. These respondents expressed concern that residential units are getting smaller leading to poor amenity for residents at the expense of quality of life.
Five respondents expressed a concern that introducing these technical standards could have a negative impact on viability and deliverability. The necessity to fully assess any local need for such standards and the viability impact of introducing them was highlighted.

One respondent stated the need would have to be fully tested in line with the NPPG. Another respondent called for more car parking facilities on new developments. One respondent drew a comparison with an emerging Neighbourhood Plan requirement stating that new residential should provide good quality outdoor amenity space.

Question 6 – Is there evidence to support the Local Plan Part 2 introducing the optional national housing technical standards in relation to water efficiency standards?

2.22 There were nine respondents to question 6. The key messages were:

Three respondents considered that the Local Plan Part 2 introducing the standards would be appropriate, two of which noted the need to consider the impact this requirement would have on overall financial viability.

Other comments included:

- Northampton is identified as a water stressed area on the Environment Agency Water Stressed Area Classification Maps
- No need to duplicate JCS Policies S11 or BN7A as the amended Building Regulations state the optional requirement of 110 litres per day per person will be required where the planning condition states. A policy to this effect for Northampton would secure the tighter standard for all new housing
- Grey water recycling and SUDS to catch rain water should be mandatory
- A comparison with an emerging Neighbourhood Plan requirement which establishes that new housing developments should achieve high level environmental performance
- The Local Plan Part 2 could create a reservoir on the A5199 near the Windhover Pub to minimise flooding and avoid drought risk

Question 7 – Are there particular sites that are not used currently for employment uses which you consider would be particularly suitable for new employment uses? The Local Plan Part 2 will not be reviewing the jobs growth which is already set out in the adopted Joint Core Strategy.

2.23 There were 12 respondents to question 7, one of which was not duly made as it was received after the consultation had closed. The key messages were:

There was a consensus about the need to secure economic success for Northampton and to support the economy by strengthening and diversifying the local economic sectors by retaining and providing high quality employment space. However, there were concerns about housing and employment being on the same site and a request was made that the impact on local residents needs to be taken into account before planning permissions are granted.
One respondent expressed an interest in commenting on any employment allocations in the Local Plan Part 2 and the need to satisfy the flood risk/ sequential test/ exception test.

A list of areas were proposed as suitable for employment including existing employment sites in the Enterprise Zone (and the Waterside), Brackmills and Lodge Farm as well as former school sites and brownfield sites in Blackthorn, some sites in West Hunsbury and one site in Towcester Road. There were also recommendations to encourage the use of empty shoe factories for culture and creative industry workspace and create a digital hub.

One respondent (not duly made) mentioned that there is a severe shortage of accessible land in the Borough, which may require a joint approach with neighbouring planning authorities or strategic land allocation cross border. Northampton may be losing warehousing, manufacturing, light industrial, workshop, offices and related industry jobs – and this is exacerbated by inflexibility in working with a 20 year old plan. Infrastructure constraints within the Central Area are also inhibiting. These challenges constrain private sector involvement and private/ public initiatives are urgently needed. Flexibility needed include extensions of the Waterside Enterprise Zone, a new Enterprise Zone, greater collaboration (e.g. between Brackmills BID and NBC) and flexibility in the plan to adapt to micro and macro circumstances. The emerging Plan should consider both allocations and protection across the sectors and across the size ranges. Northampton is prime B8/ logistics sector but is also home to a disproportionately large number of micro business, and has no status as a regional office location.

Question 8 – Outside of the Enterprise Zone, are there any other existing employment areas where opportunities could be improved and vacancy rates could be addressed? If so, how could this be achieved?

2.24 There were five respondents to question 8. The key messages were:

There was a view that medium to large businesses need to be attracted to Northamptonshire with Northampton being the hub for employees to live. In terms of the locations, there were comments about the Orbital Road system being an obvious choice for businesses to locate to and that employment needs to be focused in particular areas or zones. These areas need to be supported by new highways to facilitate the associated traffic movement.

There was a suggestion that there is evidence of demand for artist studio space/ creative industry workspace and there is an opportunity to capitalise on first and second floors of empty shops or empty shoe factories. Another respondent considers the Enterprise Zone should be a Council priority to bring investment into the town.

Question 9 – Do you think there are any areas within the Borough where certain types of employment development are generally acceptable but which currently require planning permission, which could reasonably be dispensed with through the introduction of a Local Development Order?

2.25 There were five respondents to Question 9. The key messages were:
One respondent did not support Local Development Orders (LDOs) within the historic core of the town due to the archaeological and heritage potential.

One respondent suggested that LDOs may be possible but only if restrictions such as building height, parking and public transport can still be required.

Other comments included:

- That the town square [Market Square] be leased to a private company so they can hold exhibitions and so on, therefore drawing commerce into the town centre.
- The Hospital should have a teaching arm
- The importance for employment developments to be separated from residential areas.

Question 10 – Please provide details of any particular infrastructure issues in relation to new development which you think the Local Plan Part 2 should address, if possible providing evidence?

2.26 There were 20 respondents to question 10. The key messages were:

All respondents offered a range of suggestions including reference to the Northampton Northern Orbital Route where respondents were seeking assurances that the County Council will provide fully detailed and justifiable proposals, and that the historic character needs preserving and where possible enhanced. Also, clarity is required on how this will be funded under the CIL regime.

Reference was made to the Northampton Growth Management Scheme and the need to engage and understand any pressures that may arise on the strategic road network as a result of additional development sites being identified. There is also a recommendation that where sites are located close to strategic road networks that vehicle trip impacts are adequately addressed. One respondent referred to the Infrastructure Delivery Plan produced to support the Joint Core Strategy and that this may need reassessment depending on what comes forward as part of the Local Plan Part 2. One area of concern, according to the respondent, is that the current policy was formulated in a manner where developers do not have to solve traffic problems outside their development site, and this is highly questionable. The respondent suggested the creation of a Highways Champion to look at the whole picture.

Another respondent identified the need to consider the capacity of water and water recycling infrastructure to accommodate the need for improvements where appropriate. Green, water, wastewater and flood risk management need to be recognised as types of infrastructure required to deliver small scale development and lack of infrastructure planning and time required to implement these could result in environmental limits being exceeded.

There were comments relating to the need to implement primary infrastructure to support the cumulative growth across the Borough, and for more public transport in the evenings south of the town. One respondent suggested a range of measures
including prioritise walking and cycling (and make them safe and pleasant choices)/ reintroduce proper regulation of buses/ encourage mixed developments/ make low emission zones and viable alternatives to car use available in town and produce a Cycle Delivery Plan. These would massively improve health and provide savings on NHS bills. Another respondent wants cycle routes to be a priority and that the routes should be “studded” so motorists become instantly aware when they drift into a cycle lane.

In terms of requirements, a range of options were suggested including the provision of appropriate sports facilities, additional places of worship (as mentioned in the Council’s Faith Study), encourage space sharing of community buildings and cultural buildings (leading to its multi-use). Extending safer cycling provision including making it a mandatory requirement within all new roads and road upgrades were also proposed. Also, when consent is considered for new employment, proper account needs to be taken of extra traffic and whether there is infrastructure to accommodate it.

One respondent recommended that any sustainable transport studies should identify key cycle and pedestrian routes to major employment areas, and highlight where deficiencies might be discouraging walking/ cycling to work. Commuters require safe, simple and direct routes to destination and this provision would make a contribution to achieving modal shift.

The following specific infrastructure items were mentioned:

- The Growing Together Neighbourhood Plan calls for the improvement and expansion of the network of foot and cycle paths in the area;
- A new single carriageway, all-purpose highway should be built along St Andrew’s Road, following the Brampton Valley way as far as Windhover which will relieve congestion in Kingsthorpe;
- The North West Bypass needs to be built in advance;
- Waterside development needs to use the old rail track from St James to the east and Brackmills industry as an all-purpose highway;
- Off road parking needed at the Racecourse and Abington Park;
- 3 traveller transit sites need to be provided in the north, west and south;
- All industrial buildings must be equipped with solar panels on the roof and the policy should be applied retrospectively;
- Support the reopening of the Northampton – Bedford trackbed;
- Concerned about the proposed St James Link Road as it does not meet the challenge of climate change and flooding, will not conserve/ enhance the historic and natural environment;
- Milton Ham – greenspace around Milton Ham and crematorium must be protected. Protect green spaces acting as buffers. Employment is important but not to the detriment of residents amenities; and
- Ensure transport infrastructure in place in areas around West Hunsbury and making it a no HGV area (except for access), install speed activated traffic lights/ junctions onto through routes.
Question 11 – How do we ensure a successful town centre in light of changes to shopping habits such as increased use of out of town retail and on-line shopping? The Local Plan Part 2 will not be reviewing the retail growth which is set out in the adopted Joint Core Strategy.

2.27 There were 26 respondents to question 11 – the second highest response to a question. The key messages were:

In general, most respondents consider that shopping habits have changed and that town centres need to be viewed differently. There needs to be more reasons for people to come to the town centre including for entertainment. Also, together with significant technological innovations/ internet shopping, changes in shopping patterns are having a deep and profound impact on UK high streets. The high street is vulnerable because shopping and eating at cafes can no longer be seen as the main attraction of a town centre. The high street must evolve to attract visitors and become a destination which provides experience that is wider than just shopping, promoting leisure and other town centre uses like dining so people have more reasons to come to town. There is a need to increase dwell time and create an evening economy to enliven the high street from day to evening. The recommendation is to encourage greater flexibility of uses to ensure survival of the high street and widen consumer choice. Also, there needs to be recognition of the changes to the Permitted Development Rights.

From a planning policy perspective, one respondent commented that planning policy should recognise the important role that both A3 (food and drink) and D2 (assembly and leisure) can have on improving the town centre offer. The Local Plan Part 2 should not contain stringent policies restricting main town centre uses within the Primary Shopping Area (PSA). The PSA should remain the priority for investment and therefore, encouragement should be given to a mix of uses and support to changes of use for dining and leisure to enable areas to come back into viable use.

One respondent states that the CAAP designation of Primary Retail Frontage has proved to be a significant barrier for Market Walk Shopping Centre and the introduction of uses like cafes/ restaurants, etc would make a significant contribution to vitality and viability of the town centre. This would allow Market Walk to be an attractive town centre destination.

Another respondent fully supports the creation of the Cultural Quarter but states that planning policy has not maximised the significant economic and regenerative potential of its cultural and creative sectors. There were a couple of comments on the fact that the Issues Paper did not make any reference to the Cultural Quarter or cultural facilities. It was recommended that the Local Plan Part 2 should contain detailed policies that define the vision and objectives for the Quarter, to give it identity/ protection and the ability to grow. This will also give the area a focus, a sense of place, distinguishable from other competitive locations and be a catalyst for regeneration and continued success of the town centre. Culture and arts must be a highly visible part of this identity. They need recognition given their role and importance to the continued success of the town centre. One respondent noted that the cultural quarter was clearly signposted in the town centre but not mentioned in the current Local Plan Part 2. It was suggested that this be addressed in the new Plan, by providing clear recognition given its role and importance to the continued success of the town centre.
Northampton has the potential to play on the strength of its cultural assets to drive economic regeneration.

Another respondent commented that there is a need to rethink what the town centre could be. Northampton could be at the forefront, with a mix of destination and independent shopping/ workplaces/ culture. St Giles Street being a good example, which could be extended to the rest of the town. There are good models of creative industry/ cultural business working with retail where offices and artist space co-exist.

To assist, several respondents provided the following suggestions to improve the town centre:

- There is a need for quality outlets/ higher end businesses to be attracted to the town centre. The current trend of charity shops, wine bars and 99p shops is not considered to be building a character of the town;
- The town centre needs to be attractive and safe. It could be supervised directly by security personnel and video surveillance;
- Provide regular, free shuttle buses from Park & Ride zones (e.g. Sixfields / Railway Station) to keep town centre traffic free although there is an acknowledgement that recent changes to shoppers parking has helped;
- Reduce access to alcohol especially at night by having earlier club/ pub closing times;
- Encourage reversion of unsuccessful shops to employment or residential;
- Reintegrate bus and coach stations into one site and ensure regular rapid links to and from Castle Station until at least 10 pm;
- Extend associated secure and covered cycle parking facilities across the town especially bus and train stations/ park and ride/ town centre etc;
- Create more homes in the town centre to stimulate economic activity with flexible approaches to ground floor uses, making them adaptable to the needs of the market;
- Limit takeaways/ restaurants allowed in one street due to public health;
- Limit off licences;
- Town centre recognition of the shoe industry would benefit businesses like restaurants and restore historic buildings; and
- Improve Northampton market and enhance Market Square to reflect its historic significance.

Question 12 - Are there areas where the location of betting shops and hot food takeaways should be restricted?

2.28 There were eight respondents to question 12. The key messages were:

Respondents suggested that betting shops and hot food takeaways should be restricted in numbers in the following locations: near schools, public houses, residential areas, around the Cultural Quarter, in areas already with concentrations of these uses like Abington Square and top of York Road (no more than 3 within 100 metres), the Town Square and main shopping/ parking route. Efforts should be made to encourage restaurants and other “up market” facilities.
One respondent states that the clustering and proliferation of these uses on the high street is a key planning issue because they can negatively impact on the vitality of shopping areas if not adequately controlled. Their locations could be the secondary frontages. Policy should require evidence to be provided for change of use to betting shop and hot food takeaways within the Primary Shopping Area to justify the use. Another respondent considered that excessive fast food and off licence shops should be avoided along Wellingborough Road, that the number of bars should be reduced and the sale of alcohol/ opening times restricted.

Question 13 – Is there a need for the Local Plan Part 2 to include a locally specific policy to protect and enhance areas of biodiversity in addition to the policies in the NPPF and Joint Core Strategy?

2.29 There were 15 respondents to question 13. The key messages were:

Eight respondents considered that there should be a policy to protect and enhance areas of biodiversity compared with five respondents who considered that there was no need. Those who did not support a specific policy considered that there was adequate and flexible protection through the NPPF and the WNJCS. The need to avoid repeating or doubling up on policies or statutory designations or existing protections such as the Protected Species Regulations was noted.

Places identified for protection and enhancement:

<table>
<thead>
<tr>
<th>Abington Park</th>
<th>School Playing Fields</th>
<th>Duston Wetlands</th>
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<tbody>
<tr>
<td>Sixfields</td>
<td>Allotments</td>
<td>Quarry at Duston Wildes</td>
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<tr>
<td>Reservoir on A5199 / Windhover Area</td>
<td>Dallington / Harlestone Heath</td>
<td>Upper Nene Gravel Pits SPA</td>
</tr>
<tr>
<td>Bradlaugh Fields</td>
<td>Storton’s Pits</td>
<td>Parks</td>
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Suggestions to enhance included:

- Making space for trees and hedges to encourage wildlife by defining boundary zones e.g. 5m to 10m
- Identifying and retaining areas of natural special interest including geological interest and locally important habitat types. These could form part of a special protection programme or be highlighted as areas where biodiversity needs enhancement
- Planting trees including fruit tree on land that cannot be developed e.g. former tips

Other comments included:

- Whether the Council would make funds available to invest
- Concern about development too close to the River Nene affecting the naturalisation of riverbanks which contribute to biodiversity and ecological status
- Cautioned against a one size fits all approach to areas needing biodiversity enhancement
• Highlighted that businesses need to understand how they can meet sustainability objectives
• Noted the risk of recreational disturbance to the Upper Nene Gravel Pits SPA

**Question 14 - Do you think there are priority areas where green infrastructure networks could be enhanced or extended?**

2.30 There were 13 respondents to question 14. The key messages were:

Twelve respondents suggested possible priority areas where GI networks could be enhanced or extended or potential networks and ways in which these could be improved.

Suggested Priority Areas:

- Bradlaugh Fields
- Upton Country Park
- Hunsbury Hill

Potential Networks:

- The Nene Valley Nature Improvement Area (NIA) was suggested for inclusion as a local policy that could identify opportunities for delivering improvements to the NIA through GI provision
- The Green Infrastructure Plan was noted as identifying projects representing a range of GI enhancements
- The greenway through town centre and the River Nene as a blue / green network leading to the Upper Nene Valley Gravel Pits SPA
- Ensure networks that link with the SUEs on the edge of Northampton are sufficiently provided for
- Create linear parks along walkways and cycle-ways
- Accessible Natural Greenspace and sustainable transport routes could support network identification
- Sustainable transport routes should inform locations for GI enhancement

Other comments included:

- The need for the Local Planning Authority to work collaboratively to ensure strategic priorities are properly co-ordinated and clearly reflected in individual Local Plans
- The need to review the information provided on active design (Sport England planning tool and guidance)
- Contributions towards habitat enhancement should be explored where housing allocations are located in the NIA
- Planning positively for ecological networks will contribute to the creation, protection, enhancement and management of GI
- Planting in amenity green spaces that creates a more natural feel
- Reference to an emerging Neighbourhood Plan which proposes 11 Local Green Spaces and which enhances quality, amenity value and community use
One respondent cautioned that if the Council is considering Local Green Space designations in the Local Plan Part 2 it should not automatically transfer sites previously designated in the Local Plan 1997. There should be a detailed assessment of all sites which is subject to public consultation so sites are considered on individual merit and to see if a continued designation is justified.

Question 15 – Is there a need for the Local Plan Part 2 to include a locally specific policy to protect and enhance heritage in addition to the policies on the historic environment in the NPPF and the Joint Core Strategy?

2.31 There were twelve respondents to question 15. The key messages were:

Six respondents supported having a locally specific policy. There was a view that locally important areas, eras of history, historic assets which are not in conservation areas or assets that may not be listed or designated should be identified through policy. Reasons for this approach included:

- Information for developers who could plan schemes accordingly to avoid delayed completion dates and increasing development costs
- Policy should cover desk based assessments, geophysics and trial trenching
- To implement strategic Policy BN5 on a local level by protecting, conserving and enhancing these historic assets that contribute to the history and story of Northampton
- Developing a strategy for the historic environment should correlate with other policy areas which should consider the issues relating to conservation and enhancement

Other comments

- The need to consider the impact of discovering heritage assets during construction
- That planning applications should be based on appearance and blending as well as functionality
- Supporting the Plan by a townscape assessment to support an innovative and proactive approach to the use of scale, massing, colour, etc
- Increase legal protection and enhance understanding appreciation and care of historic assets
- Concern about Northampton’s record on heritage citing several examples including the loss of our heritage as a Market Town
- Important areas and eras of history included agricultural history, history of navigation, development of shoe making and associated industries, brewing, protect local farm buildings from their pre-development past

The remaining comments were of the view that the NPPF and WNJCS provided an adequate framework and the Local Plan Part 2 needed to avoid repeating or doubling up on policies or statutory designations or existing protections like Listed Buildings under the Planning (Listed Buildings and Conservation Areas) Act 1990.
It was noted there should be sufficient flexibility to enable the conversion and re-use of listed buildings. Sometimes this may only be financially viable through “enabling” development and Local Plan policies should allow the flexibility for such development to be brought forward.

**Question 16 - Should the Council review the list of locally listed assets of historical importance?**

2.32 There were nine respondents to question 16. The key messages were:

8 respondents considered that the Council should review the list of locally listed assets of historical importance and one said probably. It was suggested there should be an on-going plan of regular reviews to keep the list up to date e.g. 10 year full review, 5 year smaller review. Reasons for reviewing included:

- The list is integral to any meaningful townscape assessment
- To protect locally listed assets of importance
- To ensure the status of the locally listed assets are still relevant
- To identify non-designated assets which offer insight into the Borough’s heritage enabling their special interest to be reflected through planning schemes

Other comments included:

- Documentation for Northampton’s historic environment is incomplete; an investigation and analysis of upstanding and buried physical remains would help fill the gaps
- The local list should link with NCC’s Historic Environment Record and the Grey Literature reports and be publically available. This would assist officers, the public, developers, etc.
- The local list needs to be extended, too much has already been lost

**Question 17 - Do you think there are locally important landscapes which should be identified in the Local Plan Part 2?**

2.33 There were eleven respondents to question 17. The key messages were:

Eight respondents supported the identification of locally important landscapes and identified potential locations. Two respondents did not support identification and one respondent requested a review of an existing locally important landscape designation. Potential locally important landscapes included:

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<tbody>
<tr>
<td>1</td>
<td>Large scheduled monuments e.g. Hunsbury Hill</td>
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<tr>
<td>2</td>
<td>Freeschool Street, St Peter’s Street and Green Street</td>
</tr>
<tr>
<td>3</td>
<td>St Andrew’s Hospital site and grounds</td>
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<tr>
<td>4</td>
<td>Billing Road Cemetery</td>
</tr>
<tr>
<td>5</td>
<td>Express Lift Tower</td>
</tr>
<tr>
<td>6</td>
<td>West Hunsbury Parks</td>
</tr>
</tbody>
</table>
Comments included:

Designation would enable leisure development, assist with planning applications and encourage future management.

Townscapes are as important as landscapes e.g. Boot and Shoe Quarter with terraces and prominent corner buildings. Take account of topography and consider eye-lines. Identify:

- locally important views e.g. of the lift-tower from a distance of 1 mile or more; view of Delapre Woods from top of Bridge Street
- other landscape features e.g. routes and trackways of historic and amenity value
- distinctive architectural patterns e.g. the jetties

Of the respondents who did not support identifying locally important landscapes one respondent stated that important landscapes had long been destroyed and the other noted that each application should be judged on its merit and where appropriate include a landscape appraisal.

**Question 18 – How do we ensure that new development preserves and enhances the character and appearance of the Borough and makes a positive contribution?**

2.34 There were thirteen respondents to question 18. The key messages were:

A variety of comments were made, these have been summarised by theme:

Developing a policy approach: Prescriptive policies should be avoided, use a general policy with emphasis on the developer demonstrating integration with justification for design proposals; need strong policies for improving the streetscape which include street furniture and signing, shop fronts, road and paving materials and guidelines on clutter; enable a flexible and holistic approach to imagination and innovation; respect
the local vernacular, character, distinctiveness and appearance of the Borough; require high quality design and materials that respond to place and urban design, layout and building styles that include reference to it; consider spaces between the buildings; ‘Build’ open spaces into new development; protect and maintain existing open spaces; manage spaces according to the character of area rather than a standard approach to all; revert to traditional housing & building form.

Practice: Resist uninspiring schemes and positively encourage those incorporating the local vernacular into their design; Encourage beneficial regeneration utilising the heritage dividend; undertake public consultation before decisions are made; Use a townscape assessment and allow developers scope over design where there is no defined context, e.g. peripheral SUEs; Allow developers flexibility in meeting design requirements to ensure viability and avoid uniform developments / personal preference in design / appearance; could use National Character Areas to provide a useful planning tool to guide the design of projects; New buildings should be distinctive on their own contributing to new architectural styles and conservation areas of the future; Planting should be an all year round interest that uses permanent successional planting to attract insects. Avoid mono-cultured grass, sow mixes of long meadow grasses with wildflowers.

Data collection and monitoring: Regularly undertake Conservation Area reviews to record the changing character of particular areas; Complete an Urban Archaeological Database (UAD) Strategy using existing UAD held by the Northamptonshire’s Heritage Environment Record (HER) to protect Northampton’s best urban historic assets; compile full archaeological survey of Northampton Battlefield.

Education and training: Conservation Officers should receive training from Historic England. Encourage Planning Officers to undertake an urban design course.

Professional support: Follow advice of County Council Archaeological Advisor on planning applications; buy qualified architect services when needed.

Question 19 – Is there a need for the Local Plan Part 2 to include a locally specific policy to promote measures within new development to address climate change and renewable energy in addition to the policies in the Joint Core Strategy?

2.35 There were fourteen respondents to question 19. The key messages were:

Seven respondents supported a policy to promote measures within new development and four respondents did not. Those supporting a locally specific policy made the following comments:

- All housing developments currently progressing through the planning process and using 2013 Building Regulations should be required to achieve energy equivalent of Code for Sustainable Homes Level 4;
- Developers should be encouraged to build with energy efficient materials and in an eco-sustainable way;
• Make solar panels mandatory on all new builds (including Council and social housing stock) and housing extensions; Retrofit solar panels on schools, warehousing, retail parks, etc;
• Consider wind technology;
• Consider sustainable transport options; encourage greater use of electric vehicles; fit Town Centre charging points; lead the way in town planning by becoming a sustainable vehicle town;
• Develop a green roof policy;
• Take advantage of underutilised urban spaces - provide multifunctional benefits through flood management, biodiversity, climate change mitigation and managing the heat island effect; and
• Manage domestic and industrial grey water and recycle rather than putting this grey water down the drains.

The other responses expressed concern about the impact such a policy might have on viability and deliverability. It was suggested that such requirements should be left to Building Regulations. Other comments included:

• The policy should not be so restrictive as to fetter the conversion or re-use of an existing building
• Such requirements affecting scheme viability could affect affordable housing provision and planning obligations
• There is concern over how the policy could be monitored over time
• Sustainability and long term adaptability are key to the development of proposals for sites

Question 20 – Should we review and incorporate existing Interim Planning Policy Guidance (e.g. Affordable Housing, Houses in Multiple Occupation, etc) into the Local Plan Part 2?

2.36 There were nine respondents to question 20. The key messages were:

Three respondents commented on HMOs themselves, responses included that HMOs tend to have a negative impact on the local area, are a social nuisance and change the cultural make up of an area, for instance in areas like Semilong and the Mounts. One respondent suggested that HMOs should be banned.

Two respondents commented that HMO policies should be consolidated into the statutory development plan, in the spirit of the National Planning Policy Framework. However, another two respondents stated that including interim guidance in the Local Plan Part 2 would make them inflexible to changing circumstances and that they should sit outside the Local Plan Part 2 and be regularly reviewed. One respondent considered that the guidance should be strengthened.

Question 21 - Are there any other issues that the Local Plan Part 2 needs to consider?

2.37 There were eighteen respondents to question 21. Most had independent and separate issues from each other which have been set out in the list below:
• Concern that the 2029 plan period will not provide a 15 year horizon by the time it is adopted in 2018
• Consider impact of new development like Rushden Lakes and the Blisworth Strategic Rail Freight Interchange proposal
• Refuse & Recycling
• Designing out crime; strategic security policy (include something more akin to Policy E40 (NLP) than Policy S10 (JCS)
• Merge CAAP with Local Plan Part 2; regeneration and restoration of existing buildings in the Town Centre; review Town Centre Article 4 Direction; develop retail strategy for Town Centre to encourage specialist and independent sectors
• Give support to development of existing education institutions, associated employment opportunities and the learning infrastructure; Provision of local schools
• Infrastructure before expansion
• Nene Valley Nature Improvement Area - deliver the sustainable regeneration of the river corridor including GI that contributes to protecting and enhancing water bodies and policies that promote GI in new development
• Include Borough wide ecological map to illustrate overview of biodiversity assets
• Gardens should be identified as greenfield land to avoid over intensive development
• All open space designations to be reviewed and assessed to determine if they are still relevant in the context of housing need
• Take Saved Local Plan Policy L24 (allotments) forward into Local Plan Part 2
• Play facilities required between Billing Rd and Wellingborough Rd;
• Duty to cooperate where cross boundary environmental risks and opportunities are best considered at a larger than local scale

Flooding
• Attenuation storage is required including at Brampton Branch and St Peter’s way, Becketts Park, Avon Nunn Mills and Ransome Road, South Bridge West and Nene Meadows and upstream between Weedon and Kislingbury
• Include policies that avoid inappropriate development in floodplains
• Maximise opportunities to reduce flood risk through regeneration and redevelopment
• Take account of residual risk associated with flood defences
• Water cycle study needs updating
• Water quality needs to consider rural / agricultural land management (given Northampton’s rural surround); drainage misconnections and polluted surface water run-off. River restoration is a key issue
• Safe cycle and pedestrian routes
• Avoid excessive numbers of off licence shops along Wellingborough Road
• Policy on air quality given the AQMAs; recharging points for electric / hybrid vehicles and low cost, preferential parking for these; on-street parking spaces reduced to encourage smaller vehicles, larger vehicles pay for two spaces
• Health and well-being needs to be identified as a key priority supported by a specific policy to make explicit the role of planning to improve these factors; medical facilities for the growing and aging population
The Sustainable Urban Extensions (SUEs) could be exemplars for health and well-being through high quality design and innovative approaches
Consider further the issue of phasing of development in relation to waste water treatment capacity

CENTRAL AREA ACTION PLAN

Question 22 - Flood Risk and Drainage (Policy 5) - is this policy still appropriate and up to date in relation to the Drainage Plan Part 1?

2.38 There were five respondents to question 22 the key messages were:

The general consensus was that the Policy was still relevant but required updating. The West Northamptonshire Level 1 Strategic Flood Risk Assessment (SFRA) (February 2009) and Northampton Level 2 SFRA (February 2010) should be reviewed with respect to flood mapping and modelling. Climate change guidance has been updated; the impacts of this on the SFRA will need to be considered.

Specific individual comments are set out below:

- Building on flood plains is questionable e.g. 41 units to be built on the A5199 just outside the Town boundary
- Clear and upgrade existing watercourses, ditches etc; most problems are due to indiscriminate backfilling, or failure to maintain them properly
- Upgrade all drainage/main sewerage to cope with 1/200 year storm events. Force developers to install these off-site where necessary
- Existing developments will require retrospective installation, this could be conditioned on applications for change of use or alterations
- Implement grey water re-cycling to reduce demand for potable water, and reduce volume discharged
- Drain roof-water to tanks before discharging into storm sewers to attenuate flows
- Consider an additional policy that takes account of the findings of the Drainage Plan for the Central Area

Question 23 - Inner Ring Road (Policy 6) - is the proposal for the Inner Ring Road still appropriate and up to date?

2.39 There were seven respondents to question 23. The key messages were:

One respondent considers that the IRR is a fragmented combination of many roads/traffic lights/pedestrian crossings and does not flow as a ring road. The respondent considers an outer orbital road system to be effective in allowing traffic to pass around the town and not through it. One respondent considered that the IRR is definitely appropriate. Another respondent considered that the aims are acceptable but updated traffic counts needed to check whether growth is in line with predictions and whether the aims as stated are achievable.
One respondent considered that the policy needs updating to reflect changes in the circumstance since the CAAP was adopted. It was recommended that the Northampton Town Centre Transport Strategy should be updated at the same time and that it should form a key part of the evidence base.

There was a suggestion that walking and cycling should be prioritised and that they should be made safe, convenient and pleasant choices.

One respondent referred to the new University of Northampton campus which will drastically increase pedestrian and cyclist crossing at St John’s car park exit onto Victoria Promenade across to Becket’s Park. There were safety issues here and a new shared surface crossing will help reduce the perceived importance of vehicle traffic and enhance the connection to the Cultural Quarter to Becket’s Park and the University. It was recommended that a separate paragraph be added to CAAP Policy 6.

Question 24 - Safeguarded Public Transport Route (Policy 8) – is the proposal for a public transport / cycling / walking route still appropriate and up-to-date?

2.40 There were ten respondents to question 24.

Although Question 24 relates to the Safeguarded Public Transport Route some respondents commented on transportation and movement on a more general basis.

One respondent considered that the safeguarded route constitutes an essential piece of infrastructure for the town and two respondents said the policy should be updated to ensure delivery/ and to reflect changes in circumstance since the CAAP was adopted. Another mentioned that the route should be better preserved as a railway and that there is a need to invest in trains to bring it back into use. Or, now that the rails have been removed, it should be brought back into use as a public transport route. One respondent directed the Council to a website which explains how the design element should be taken into account when planning for sports related facilities.

The more general comments include the point that cycle routes are inadequate, and that more usable and well-lit cycleways are needed. To assist cyclists, cycle routes should be a priority and these routes should be studded so motorists become instantly aware when they drift into a cycle lane. One respondent gave a generic overview of prioritising walking and cycling, making them safe and convenient choices, together with road danger reduction approaches. A variety of measures were recommended: reintroduce deregulation of buses, mix developments, low emission zones, viable alternatives to cars in the town, produce a Cycle Delivery Plan. One respondent commented on the fact that the current bus station is an example of poor planning because it is too small and should be next to the railway station. It is not encouraging people to leave their cars at home and catch the bus. The same respondent referred to the layout of Northampton and surrounding villages which mean that people still use their cars. There is a need to encourage walking, cycling and motorcycling, and that the Norbital cycle path and Brampton Valley linear park are a bonus to the town. One respondent considered that buses need to be smaller.
One respondent made reference to the Growing Together Neighbourhood Plan and its requirement for the improvement and expansion of the network of foot and cycle paths in the area. Another respondent considered that the Northampton Town Centre Transport Strategy should be updated and be used to update a key part of the transport evidence base to support the new Local Plan Part 2.

**Question 25 - Pedestrian and Cycling Movement Network (Policy 9) – should this policy be updated to link to the County Council’s Smart Corridors initiative? Are the identified routes into and across the town centre still up-to-date?**

2.41 There were seven respondents to question 25. The key messages were:

Some comments were similar to comments already made to other questions. There was a general consensus that there is a need to prioritise walking and cycling (for work and for leisure) and cycle routes which can be distinguished from the roads, allowing motorists to be aware when they stray into cycle lanes.

One respondent considered that the policy needs updating to reflect changes in circumstances since the CAAP was adopted and that the Northampton Town Centre Transport Strategy also needs updating. Another respondent referred to the Growing Together Neighbourhood Plan and the requirements for the improvement and expansion of the network of foot and cycle paths in the area.

**Question 26 - Parking (Policy 10) – should the Council identify more car parks within the town centre and if so, where should they be?**

2.42 There were eight respondents to question 26. The key messages were:

Some respondents considered that the current multi storey car parks are a blot on the landscape and that they are concrete jungles which are poorly maintained and unsafe, and some car parks are too far from where they are needed. One respondent stated that the policy appears punitive by restricting parking without offering realistic alternatives such as enhanced public transport. Another respondent stated that the policy and evidence base need updating to reflect the changes in circumstance. There was one respondent who said there is a reasonably good provision with the exception of the hospital although there is recognition that effort to address this has been made through the new upper level visitor car park.

Some suggestions include the provision of more parking spaces (reference was made to the Old Barclays site), prioritise walking and cycling, reduce dependence on cars and use existing ground level parks like Sixfields and Midsummer Meadow with efficient free shuttle service with trams and overhead pods. Park and ride should also be considered.

**Question 27 – Improving the Retail Offer (Policy 13) – this policy needs to be updated due to changes in Government policy such as the extension of permitted development rights. Do secondary frontages still need to be identified?**

2.43 There were five respondents to question 27. The key messages were:
There was a general consensus that the policy should be updated in the light of changes of use of town centres. The following were suggestions for the retail frontages:

- Secondary frontages should be used for preserving a mix of uses for a healthy variety instead of specifically preserving retail use (e.g. at least 60% retail or no more than 30% of ground floor frontage to be any single non-retail use class)
- Remove the 80% of the Use Class A1 (under the Town and Country Planning (Use Classes) Order 1987 (as amended) retail frontage cap and the restriction on the number of premises not being under class A1. These restrictions can result in units remaining vacant even though there is demand for other uses. Secondary frontages still need to be identified in the CAAP to maintain the distinction between the function of different parts of the town centre and how they contribute to its overall vitality and viability
- Some uses are less desirable in the Primary Shopping Area like hot food takeaways and betting shops
- There might be a case for the town’s Conservation Areas Article 4 Directions to be reviewed in light of the extensions to the Permitted Development Rights
- Making improvements to retail frontages has been a great success on St Giles Street. This demonstrates that retailers can retain individual character whilst creating a smart and coherent look. Other frontages which could benefit from the same treatment include Gold Street, Bridge Street, Abington Street, Wellingborough Road. Currently, these streets do not have the appearance of a lively town capable of attracting residents, workers or visitors

From a more general perspective, there was a recommendation that the architectural quality of shops be improved and that the recent award for St Giles Street is a good start. This needs extending to other streets including secondary frontage. To compete with Milton Keynes and Market Harborough, the whole package needs to be in place and not just one street. There was also a suggestion that a major commercial initiative is required to attract appropriate retail giants to the town, and this this should be politically free and involve local experts and residents.

**Question 28 - Meeting Retail Capacity (Policy 14) – do we need a more up-to-date retail capacity study to ensure that this policy is up-to-date?**

2.44 There were six respondents to question 8. The key messages were:

One respondent pointed out that the retail capacity requirements set out in Policy 14 of the CAAP are inconsistent with the retail requirements of the JCS. The same respondent also referred to Question 11 which states that retail growth will not be reviewed, so it is unclear as to the intention of Question 28. Clarity is required on whether a new retail study will be commissioned or whether the retail study for the West Northamptonshire Joint Core Strategy Local (Plan Part 1) will be used as a guide. The respondent considered the figures to be out of date and that a revised policy should state that retail capacity will be reviewed on a regular basis setting out a clear timescale for clarity.

One respondent commented that retail capacity is not the issue, rather, it is about ensuring and directing better use of existing capacity. There is a need to look at
existing architecture facades above shopfronts and force these to be more sympathetic and in keeping with the standards. Another respondent stated that more retail space was not needed as the internet is likely to power ahead for the foreseeable future.

One respondent questioned whether the Council has resources and expertise to deal with the issue. The respondent considered that the policy should be supported by a vision, strategy and serious plans to be effective.

**Question 29 - Office and Business Uses (Policy 15) – this policy needs to be revised due to changes in Government policy. Should we identify land for new offices within the town centre? How should the Council seek to safeguard existing office space, especially in light of recent and proposed Government changes regarding permitted development rights?**

2.45 There were six respondents to question 29. One of which was not duly made as it was received after the consultation had closed. The key messages were:

There was an agreement that more business activity should be encouraged into the town centre and that office space in the town centre should be expanded to facilitate wider investment. This could be achieved in the following ways:

- Encourage offices, smaller and new start-up businesses into the town centre to stimulate visitors and improve retail footfall
- Non-residential vacant buildings should be given priority for business use

There was a suggestion that the town centre requires a healthy and balanced mix between daytime and nighttime experience. In the daytime, there is a need to attract more commerce and create a dynamic ancillary business culture (e.g. restaurants and fast food outlets for workers). At night, there is a need for a vibrant, safe entertainment culture which attracts visitors and residents to fill the void left by daytime commerce. There were comments about needing smarter pubs and restaurants as well as better consideration of parking facilities and refocus on the drinking culture.

One respondent asked for caution to be exercised by updating existing evidence base (West Northamptonshire Employment Land Study 2010 and Northampton Employment Land Study 2006) before deciding whether there is a need to identify land for new office space within the town centre. It was considered that there should be an assessment of both the requirement and the quality of existing office stock before a safeguard is put in place. Reference was made to the Northamptonshire Local Economic Assessment 2015 which concluded that office market in Northamptonshire is small compared to areas like Milton Keynes.

One respondent (not duly made) stated that flexibility is needed with the pace of change in other sectors (retail, leisure, offices, education, service industries, voluntary sectors) with an accelerating phenomenon. Large parts of the town centre could be transformed into a simplified planning zone with market led allocations of land/ space at one end of the scale and protection for micro businesses at the other. The respondent considered that mixing and integrating space uses is more holistic and sustainable. Mixed use scheme at Greyfriars would assist. There are benefits with the
greater public/private initiatives, micro economic circumstances and various regeneration projects. The Local Plan Part 2 will need to allow for far greater private sector involvement. There is a need to underline Unique Selling Points, provide a forum for residents/businesses/visitors and increase profile of the new Plan and Northampton itself.

Question 30 – Do any of the site specific policies need updating? Please indicate which policies and provide details if possible (Policies 18-35).

2.46 There were four respondents to question 30. The following comments on policies were:

• Policy 18: Is retail appropriate for the Library? Character and use of upper Abington Street has changed significantly
• Policy 20: St Johns - The student accommodation and hotel have been provided but preclude the restaurants, cafes, active frontage, enhanced pedestrian routes and public space. Creative planning is needed to turn this service area round
• Policy 21: Angel St – the new development does not provide a public route through or significant public square. It needs to be re-planned to be an attractive, well used-public area
• Policy 28: Avon / Ransome Rd / Nunn Mills needs radical review to take account of Waterside Campus
• Policy 29: Waterside: Becketts Park - Originally devised for housing but site is now university campus. Many elements of the policy remain the same but specific consideration needs to be given to the role of Becketts Park
• Policy 31 (Market Square) amend to allow greater flexibility for restaurant uses at Market Walk Shopping Centre.
• Policy 32 Drapery has significantly changed in character now the bus station has expanded along the length of it. The area needs remedial planning to solve the problems of people queuing in too small a space which restricts pedestrian movement
• Policy 33: Freeschool St should be updated. Remove aspiration to redevelop for office use (B1) with small scale retail. The site is not viable for this and should be redeveloped for primary residential use of appropriate scale and density for its location
• New sites will need to be informed by an up to date Water Cycle Study and Strategic Flood Risk Assessment (SFRA).

Question 31 - Please provide details of any other policies in the Central Area Action Plan which you consider the Council should reassess to ensure that they are up-to-date, if possible providing evidence.

2.47 There were four respondents to question 31. The key messages were:

• There was scepticism towards the “flawed bus station concept” and the “mythical Grosvenor Centre improvement” and the fact that the train station needs further work particularly in relation to accessibility for the disabled
• There was a query as to why there has been no transport hub to encourage wider use of public transport and noted the omission of a plan which brought together the train and bus stations
• The Freeschool Street site should be removed from CAAP Policy 15
• There is a need for creative planning and planning for empty spaces. It was acknowledged that there had been some initiatives such as Collective Collaborations and the University/Made in Northampton/Screen Northants. However, these were considered to be ad hoc and difficult to negotiate and organise. With the University moving to the town centre, there is an opportunity to create spaces for students to use alongside culture and creative industries. There are discussions about the potential for the County to be the Capital of Culture for 2021
• There should be some new public realm activity or planning for new spaces
• Riverside development offers the opportunity to think creatively about the public realm
3 OPTIONS CONSULTATION (REGULATION 18)

3.1 The Options consultation followed the Local Plan Part 2 Issues and associated Sustainability Appraisal Scoping consultations which were undertaken between April and June 2016. It focused in more detail on some of the key issues in preparing the Northampton Local Plan Part 2 and formed the second formal stage of consultation for the Plan.

3.2 The Northampton Local Plan Part 2 Options consultation commenced on 21st September 2016 and closed on 2nd November 2016. This second stage of consultation sought to address the following topic areas:

- Delivery of new housing
- Delivery of new employment and expansion of existing employment
- Enhancement of the town centre
- Protection of the historic and natural environment
- Provision of detailed development management policies for informing pre application discussions, determining future planning applications and to inform appeals

3.3 The second stage of consultation invited comments on the following documentation:

- The Northampton Local Plan Part 2 – Options Consultation Paper
- The Sustainability Appraisal of Options Consultation Paper

3.4 A copy of the above documents can be found on the Council’s website on the following weblink: https://www.northampton.gov.uk/info/200205/planning-for-the-future/2325/northampton-local-plan-part-2---options

Availability of Consultation Documents

3.5 Table 5 outlines where the consultation documents were available to view.

<table>
<thead>
<tr>
<th>Table 5 - Availability of consultation documents</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Website</strong></td>
</tr>
<tr>
<td><strong>Council offices</strong></td>
</tr>
<tr>
<td><strong>Libraries</strong></td>
</tr>
</tbody>
</table>
Email

Copies of the consultation documentation could also be requested by emailing the Council’s Planning Policy Team.

Writing

Copies of the consultation documentation could also be requested by writing to the Council’s Planning Policy Team.

Translated documents

Copies of translated or other formats of the consultation documents could be requested via the Council’s Translating and Interpreting services.

Who was invited to make representations to the Local Plan Part 2 Options consultation?

3.6 A comprehensive consultation database which comprised of residents, elected representatives, community and voluntary groups, developers and businesses, infrastructure providers, government agencies and other prescribed bodies (as detailed in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 were invited to take part in the consultation. The database has increased as the plan has progressed and has been updated with individuals and organisations that wish to be formally kept informed of the Plan as it progresses to adoption.

How were consultees invited to make representations to the Local Plan Part 2 Options consultation?

3.7 The Council contacted every organisation, business and individual on its electronic database which included the specific statutory bodies as listed in the Town and Country Planning (Local Planning) (England) Regulations 2012. Details of how they were contacted are in Table 6 below. Examples of materials used to notify individuals and organisations of the consultation can be found in Appendix B.

Table 6: Methods of inviting consultees to take part

<table>
<thead>
<tr>
<th>Statutory Consultees including specific consultation bodies, general consultation bodies, neighbouring bodies and prescribed bodies</th>
<th>Letters and email notifications explaining the Options consultation and providing details of how to respond were sent to all statutory consultees as listed in the Town and Country Planning (Local Planning) (England) Regulations 2012 including specific consultation bodies, the general consultation bodies, neighbouring local authorities and prescribed bodies.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-statutory consultees</td>
<td>Letters and email notifications were sent to non-statutory consultees on the Borough Council’s Local Plan database including other organisations and</td>
</tr>
<tr>
<td><strong>Council Website with an on-line Corporate response facility</strong></td>
<td><strong>Inspection Locations</strong></td>
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<tr>
<td>---------------------------------------------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>All Options consultation documents were made available on the Council’s website which had an on-line Corporate response facility known as Survey Monkey</td>
<td>All Options consultation documents were made available at the following Council locations:</td>
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<td></td>
<td>The One Stop Shop at the Guildhall</td>
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<td></td>
<td>All Council libraries:</td>
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<td></td>
<td></td>
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<tr>
<td></td>
<td>• Abington</td>
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<tr>
<td></td>
<td>• Duston</td>
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<td></td>
<td>• Far Cotton</td>
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<td></td>
<td>• Hunsbury</td>
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<td></td>
<td>• Kingsthorpe</td>
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<tr>
<td></td>
<td>• Northamptonshire Central Library</td>
</tr>
<tr>
<td></td>
<td>• St James</td>
</tr>
<tr>
<td></td>
<td>• Weston Favell</td>
</tr>
<tr>
<td></td>
<td>• Wootton Fields</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Consultation Leaflets</strong></th>
<th><strong>Consultation Banners</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Leaflets were distributed to the following:</td>
<td>Banners advertising the Options consultation were placed at the following locations:</td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>• All Borough Councillors</td>
<td></td>
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<tr>
<td>• All Northampton Libraries</td>
<td></td>
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<tr>
<td>• Parish Councils in Northampton Borough</td>
<td></td>
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<tr>
<td>• Neighbourhood Forums in Northampton Borough</td>
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<tr>
<td>• Community Centres in Northampton Borough</td>
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<tr>
<td>Note:- In addition a set of all these consultation documents and leaflets were also available for reference at these locations</td>
<td></td>
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<tr>
<td><strong>Newsletter</strong></td>
<td><strong>Social Media</strong></td>
</tr>
<tr>
<td>The Northampton Local Plan Part 2 newsletter was prepared for all the Borough Councillors to provide them with a briefing on the Options consultation including an overview of the content, consultation actions and timetable.</td>
<td>The Options consultation was publicised on the Council’s Facebook page and Twitter feed.</td>
</tr>
<tr>
<td><strong>Press Releases</strong></td>
<td></td>
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<tr>
<td>There were two press releases for the Options consultation. One was prior to the Council’s Cabinet (before 7th September 2016) and one was prior to the start of the consultation (before 21st September 2016)</td>
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</tbody>
</table>
A workshop was held on 17th October 2016 for all Parish Councils and Neighbourhood Forums in Northampton Borough to receive an update on the Local Plan Part 2 preparation process and a briefing on the Options stage consultation.

All Northampton Borough Councillors were invited to attend a workshop which was held on 17 October 2016 in order to receive a briefing on the preparation and consultation process of the draft Northampton Local Plan Part 2 Options Consultation and to discuss the consultation document.

On the afternoon of 13th October 2016, the Council’s Planning Policy Team were available at the Council’s One Stop Shop located in the Guildhall to answer questions about the Options consultation.

A workshop was held on 27th October 2016 with Officers from the Northampton Borough Council’s Development Management section, who manage the Council’s pre-application inquiries and planning applications, to discuss the Local Plan Part 2 Options consultation.

Officers continued to meet and engage with partners from the local community including charity and professional organisations.

3.8 Consultees were able to comment on the Local Plan Part 2 Options Consultation via the following methods:

- Via the Council’s online comments form on the Council’s website
- Via a specially designed online survey through Survey Monkey on the Council’s website
- Via email to the Council’s Planning Policy Team
- Via post to the Planning Policy Team at Northampton Borough Council, The Guildhall, St Giles Square, Northampton NN1 1DE

3.9 A total of 45 representations were made to the Northampton Borough Council Local Plan Part 2 Options Consultation. A copy of these consultation responses can be viewed on the following Council web page. It should be noted that personal details have been redacted.


3.10 The 45 representations to the consultation were made by the methods outlined in Table 7. Table 8 contains details of recorded visits to the website and hits on social media.
Table 7: Summary of how responses were received

<table>
<thead>
<tr>
<th>Method of Response</th>
<th>Number of Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Council’s Corporate Website via Survey Monkey</td>
<td>12</td>
</tr>
<tr>
<td>Written comments</td>
<td>23</td>
</tr>
<tr>
<td>Comment form</td>
<td>6</td>
</tr>
<tr>
<td>Not Duly Made i.e. received after the consultation deadline</td>
<td>4</td>
</tr>
</tbody>
</table>

3.11 Of the 45 responses received, 42 were received electronically via email or through Survey Monkey and 3 were received by post.

Table 8: Other Information

<table>
<thead>
<tr>
<th>Information Source</th>
<th>Recorded Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council’s Corporate website</td>
<td>356 recorded visits</td>
</tr>
<tr>
<td>Council’s Twitter Page</td>
<td>1094 received the information via Twitter</td>
</tr>
<tr>
<td>Council’s Facebook Page</td>
<td>No information available</td>
</tr>
</tbody>
</table>

Key Issues arising from the Northampton Local Plan Part 2 – Options Consultation

3.12 To comply with the regulations governing the preparation of local plans the Council has outlined in this statement the main issues raised in the second stage of consultation and how the Council has addressed these in the drafting of the Local Plan.

3.13 The responses have been grouped and summarised by topic areas. In summary, the key issues are:

Process of Plan Making

- Concern about the level of information provided
- Without proposals maps, it was not possible to comprehensively respond
- Reference to an evidence base was unclear
- Importance of cross boundary working
- Plan should be relevant and proactive
- Should have flexibility of attitude and simplicity of policy.

Travel and Transport

- Concerned with the impact that the level of proposed growth would have on the Strategic Road Network
- Potential impacts should be considered as part of the development management process
- Effect that growth could have on the operation of the M1 junctions
- Greyfriars site should be the town’s bus station
Housing

- It was supported that there were enough reasonable options to provide land to accommodate new homes, employment and other uses
- There was also support for proposals to set a minimum residential density for Northampton Borough
- Clarity on the Brownfield Register and Permission in Principle asking how this will sit alongside the Local Plan Part 2
- Clarity through the Local Plan Part 2 on a local affordable housing requirement
- Wanted a clear policy on affordable housing that sets out the Council’s ambition to meet local housing needs, and also local aspirations for affordable home ownership.

Heritage

- Strongly welcomed the inclusion of heritage assets
- Heritage assets should be taken into account throughout relevant plan policies
- Policies relating to Battlefields and Non-designated heritage assets should also be included

Water resources

- Supported the principle of the optional water efficiency standard being applied to both residential and non-residential developments
- Scope for a policy on river ecosystem protection, preservation and restoration.
- Not necessary to duplicate the requirements of the Joint Core Strategy Policy BN7A in the Local Plan Part 2
- Was noted that policies and Plan text would need to be updated once the Water Cycle Study and Strategic Flood Risk Assessment has been refreshed.

Open Space, Sport, Recreation, Health and Wellbeing

- Development Management policies should be developed to enable the delivery of the actions / outcomes of the Open Space, Sport and Recreation Strategy.
- A policy on play space having noted the shortage of this provision
- The inclusion of a health and wellbeing development management policy would help ensure (in a more structured and rigorous way) that new developments are taking advantage of opportunities to support and promote wellbeing and prevent ill health.

How representations were addressed in taking the Local Plan Part 2 forward

3.14 The responses to the Local Plan Part 2 Options consultation and further work, along with evidence and comments made during the previous Local Plan
consultations, have helped to inform the preparation of the Northampton Local Plan Part 2 Draft Submission.

3.15 As a part of addressing the issues raised by the consultees and to advance preparation of the Local Plan Part 2, a number of pieces of evidence were commissioned by Northampton Borough Council:

- Viability Assessment
- Open Space, Sport and Recreation Study
- Retail and Leisure Study

3.16 A Housing Technical Paper has also been produced by officers and together with the reports above, these have helped shape and influence the Local Plan Part 2 moving forward.

Options Consultation – Summary of responses

3.17 All responses received were considered and published on the Council’s consultation portal in accordance with the General Data Protection Regulations.

Question 1: Do you have any comments on the vision for the Northampton Local Plan Part 2?

3.18 There were twenty two respondents to question 1, one of which was not duly made.

Five respondents were openly supportive of the vision with one stating it is to be applauded but adding “it is the delivery we must concentrate on”.

This question generated a mixed response which can be broadly divided between observations on the plan making process, housing, heritage, transport, and open space, sport, recreation, health and well-being. It is fair to say that whilst their responses will be summarised below as responses to the question on the Plan’s ‘vision’, some are clearly not specifically ‘vision’ related. Instead they over-spill into more general thoughts on the relative topic areas in the respondent’s reflections.

Plan Making
Two respondents made specific reference to the plan making process. One expressed concern that the proposed plan period was potentially falling short of the National Planning Policy Framework (NPPF) which states that Local Plans should be drawn up over an appropriate time scale, “preferably a 15-year time horizon”. The respondent noted that if the Plan was to be adopted in 2018 it would actually need to cover the period up to 2034. Another respondent was doubtful about the ability of Northampton Borough to accommodate all its housing requirements up to 2029. This, they continued, meant effective ‘duty to cooperate’ would be critical to look at and reach agreement on how any unmet need can be accommodated most sustainably.

Housing
Three respondents made reference to housing. One noted that the vision in the ‘draft plan’ should make reference of the need to deliver the housing and economic growth
set out by the adopted West Northamptonshire Joint Core Strategy. Another wanted to emphasise support to the part of the document which states: “provide a balanced range of high quality housing to meet different housing needs”. The third thought the vision could be improved by reference to meeting local residents’ aspirations, as well as their needs, for example: ‘By 2029 Northampton will provide a balanced range of high quality housing to meet different housing needs and aspirations and offer an excellent quality of life for its communities.’

Heritage
Three respondents made reference to issues of heritage. One welcomed the reference to high quality design choices and distinctive historic character. The other two looked at strengthening the vision. One noted that it only made a glancing reference to the role of town history and that a better statement would be “a place where history and innovation co-exist”. The other wanted to see specific reference within the vision to ‘heritage assets, both designated and non-designated’ to ensure a sound Plan in accordance with the NPPF.

Transport
Five respondents made reference to transport issues, all expressing concern. 2 mentioned a lack of reference to public transport with one expanding on this by expressing surprise that there was no specific section relating to Traffic and Transport planning. Traffic congestion and air quality is a concern. The northern relief road is long overdue but it will only be a temporary solution given the anticipated growth. Given the more radical transport solutions being looked at in towns like Nottingham, Leeds and Bristol it seems remiss that transport is not given a more substantial section of the Plan. Two further respondents articulated their disappointment that infrastructure does not appear a prime concern making particular reference to the need for new roads. The last voiced concern over longer term growth options for Northampton and the impact that might have on North Northamptonshire particularly with respect to limited capacity of the transport infrastructure to the east of the town and possible coalescence.

Open Space, Sport, Recreation, Health and Well-being
Three respondents made reference to the issues of open space, sport, recreation, health and well-being. One said the vision should reference sport and active recreation as a contributor to health. Another wanted the vision to incorporate a more explicit reference to health and wellbeing. The last respondent was very concerned about the proposal to utilise open space for housing if it is of 'limited value', 'underused' or 'no longer serves its designated purpose'. They continued that without any indication on how this would be assessed the notion was very dangerous and the proposal should be removed.

No Category
The final three responses were stand alone. The first believed that the vision was missing a reference for community provision. The second queried why the vision would make reference to the “Saints” but not the “Cobblers”. The third (not duly made) was of the view that too many political overtones/restrictions were being applied by local career politicians with very little knowledge of business. They went on to say that local business people should be consulted more on how to create the right environment for business start-ups.
Question 2: Do you think there are other objectives that should be included?

3.19 There were twenty three respondents to question 2, one of which was not duly made.

Those providing specific support to the objectives as they stand are set out in the table below. Some objectives received more support than others. The numbered columns in the table below represent the 12 objectives that were consulted upon, with each ‘X’ representing specific support.

Table of responses endorsing objectives

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Overall the question generated a mixed response which can be broadly divided between observations on plan making, and the objective categories of connections, economic advantage, educational attainment, housing, heritage and climate change. It is fair to say that whilst the responses will be summarised below as responses to the question on the Plan ‘objectives’ some are clearly not specifically ‘objective’ related. Instead they over-spill into more general thoughts on the relative topic areas in the respondent’s reflections.

**Plan Development**

Three respondents commented on issues of plan development. The first stated that the Borough will struggle to meet employment needs within its own boundary. Therefore the duty to cooperate should be embraced by the Council and adjacent authorities to provide for any unmet needs as close to the Borough boundary as possible. Another was of the view that fewer objectives more firmly entrenched in the Northampton experience would give more resonance with local people and make the Plan more capable of being delivered. Lastly one respondent noted that there is a gap between the policies that underpin the planning process and the management of delivering the [Plan] vision.

**Objective 1 - Connections**

Three respondents made reference to travel and transport. One thought the objective could be made firmer by stating which sustainable transport modes are most appropriate for Northampton. They went on to note that reference to rural areas should be removed from the sentence. The other two considered sustainable transport with the first stating that Northampton needs a bus station 3 times the size of the existing provision. The second specified the need for much improved and more clearly defined
links between the centre of town (primarily an improved bus station) and the rail station and the General Hospital. The respondent went on to highlight that because of the length of time and unreliability of bus travel and the expense of parking at the train station they would generally prefer to travel by car.

**Objective 3 – Economic Advantage**
There were three comments relating to this objective. One respondent said there needed to be provision of affordable business premises for local business especially start-ups. The other made two points; firstly they expressed concern at the suggestion that employment land might be lost to housing. If this should be the case, then opportunity to expand existing, successful employment sites should be capitalised on. They continued by noting that the Local Plan Part 2 should incorporate flexible policies which will help encourage potential investors and developers seeking to progress employment development in Northampton.

**Objective 5 – Educational Attainment**
Two respondents made comments with regard to education. The first noted how important it is for NBC to maintain a commitment to employment, training and education by using structured interventions that are already in place. They went on to advocate the inclusion of such interventions within the Local Plan. This approach would support Objective 5. The other noted that there is no specific support within the Plan, as yet, for new development associated with the expansion of educational institutions and establishments. Enabling educational institutions to grow and expand the range of opportunities is a key objective.

**Objective 6 - Housing**
There were seven observations relating to housing. Two were of the view that delivering the SUEs within the NRDA would assist in meeting the objectives. One went on to state that Objective 6 should make a direct reference to delivering the SUEs. Another respondent thought the objective should be amended to make reference to meeting not only residents’ needs, but also their aspirations. This they suggested would support the delivery of the vision, and set a clear message to developers that housing needs to achieve more than the bare minimum needs. Another respondent was keen to get more people living in the town centre to energise it. They went on to suggest that there are plenty of existing buildings that could be renovated to provide additional homes. Lastly, one respondent made reference to a potential brownfield site in Kingsthorpe Hollow that they believed would be more suitable for housing than its existing sui-generis use for scaffolding, skips and waste disposal.

**Objective 8 - Heritage**
Two respondents drew reference to Heritage. The first believed that the Borough should have a Heritage Plan to inform the development of policies in the Local Plan Part 2. They went on to spell out how economic prosperity and social cohesion benefit from a strong sense of local identity and pride built around the history of the area. The other respondent suggested that the wording for objective 8 could be strengthened to “the Borough’s cultural heritage, including Conservation Areas, listed buildings and archaeology will be protected and enhanced”.

**Objective 10 – Climate Change**
Two respondents made suggestions with regard to Objective 10. The first wanted to see another bullet added that would explicitly support the climate change measures set out in the draft Northampton Low Emissions Strategy. The second respondent thought the objective should include reference to 'securing tighter water efficiency requirements', a change that would help align the objective with the National Planning Practice Guidance.

**Open Space, Sport, Recreation, Health and Well-being**

Three people made reference to open space, sport, recreation, health and wellbeing. One was disappointed there was no reference to sport, leisure and active recreational facilities apart from town centre provision and no reference to protect and enhance existing and/or create new provision right type / right place. Another stated there should be an objective to provide suitable play space and accessible community space within the town centre. The third respondent highlighted the health and wellbeing challenges faced by Northampton and the issues around health services. Given these concerns they believed a more explicit health and wellbeing objective should be included.

**Neighbourhood Planning**

One respondent commented that it would be helpful to see the aspiration of the Spring Boroughs Neighbourhood Plan reflected in the new Local Plan Part 2 and made specific reference to the Neighbourhood Plan proposal for an urban park in the area.

**General Observation**

One respondent (not duly made) was of the view that the local electorate should have more say on decisions currently made by Guildhall committees. They suggested a focus on employing local, small scale construction industries in the first instance. They concluded that mixed use development of hi-tech business alongside housing and with parking would solve a number of issues.

### Question 3: Do you agree that we should apply a 20% housing land supply buffer to our housing land supply?

3.20 There were twenty one respondents to question 3, of which one was not duly made.

Thirteen of the respondents agreed to the 20% buffer, one respondent did not agree and seven of the respondents either had no opinion/undecided, suggested alternative approaches or had different opinions.

Nine respondents stated that NBC had persistent under delivery of housing, therefore a 20% buffer should be applied as set out under the NPPF. Seven of the respondents pointed out that NBC’s persistent under delivery of housing has been defined in a recent appeal decision (ref:APPN2825/W/14/2228866, application for Northampton South of Brackmills SUE).

One respondent pointed out that although NBC confirmed that the Council could demonstrate ‘no more than 3.76 years supply’ in relation to the Secretary of State’s appeal decision on Northampton South SUE, the figure was based on a 5% buffer. If a 20% buffer was applied, the Council’s land supply would drop to 3.29 years.
One respondent stated that ‘Northampton Related Development Area 5 Year Housing Land Supply Assessment April 2016’ applies a 20% buffer to the initial housing requirement and the report confirms that the Council is working on the basis that allocated SUEs within the NRDA contribute towards Northampton’s housing growth and are thus included within the Borough’s 5 year land supply calculations. The respondent suggested that it is necessary to provide clarification on the future of the NRDA and monitoring arrangements (i.e. all development within the NRDA is assigned to Northampton’s supply figures) to ensure that there is clarity for all moving forward. This respondent mentioned that his/her clients are proposing to develop at one of the allocated SUE sites and the capacity of the part of the site is due to be tested prior to submission of a planning application. It was suggested that NBC should acknowledge and increase the quantum of housing to be delivered at his/her client’s site as the plan making process continues.

Two respondents suggested that the shortfall should be addressed utilising the Sedgefield method.

One respondent stated that it is important to acknowledge that the application of a 20% buffer does not increase the overall levels of development but, as suggested within the options document, means that a number of the allocated sites must be deliverable in the short to medium term (5 years). These sites 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. This respondent also expressed support for the identification of broad areas where medium-scale development would be supported in principle. This approach would offer additional clarity and help to direct development to the most sustainable locations. The respondent’s development site was promoted. One respondent supported the recommendation that priority should be given to sites which can be delivered in the short term. However, the respondent was uncertain as to what is meant by prioritising as this is not explained in any detail in the options consultation document.

One respondent stated that NBC should also consider building in flexibility in terms of the overall provision to ensure that housing requirements are delivered in the plan period. It was suggested that NBC should adopt the approach to ensure a more effective supply of housing land for the medium to long term rather than just for 5 years, by providing additional flexibility over and above the identified objectively assessed housing need, along with provision for developable reserve sites equivalent to 20% of a Council's housing requirement.

One respondent suggested that NBC needs to adopt a strategy which seeks to maximise residential development and also needs to be afforded to the overall housing figure for the Borough. The 18,870 should be a minimum target and should not be a cap on development. Also, the emerging Local Plan Part 2 should provide a strategy for delivering housing beyond 2029. The current target is to adopt the Local Plan Part
in 2018. This means there will only be 11 years of the plan period left. The Local Plan Part 2 should consider a period beyond 2029 and contain a strategy to meet a revised housing target which is based on robust evidence contained in an up to date objective assessment of need through a revised Strategic Housing Market Assessment.

One respondent stated that dwellings should not be located too close to key transport corridors as the populations residing there will be exposed to poor air quality issues.

One respondent suggested removing the word “also” from ‘The Strategy’ on page 8 to instead read “The historic environment will be central to shaping the Borough’s future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places.” The respondent also suggested making reference to heritage assets in order to strengthen ‘providing new homes’.

One respondent who did not agree with a 20% buffer stated that the appeal decision referred to is based on a ‘growth figure’ from the time when Northampton was part of the Milton Keynes and South Midlands Growth Area prior to 2011 which is not an objectively assessed housing need requirement. Therefore the assessment against this requirement is not appropriate. It was suggested that NBC should focus on the period from 2011 in making its decision, when there was an objectively assessed housing requirement in place against the level of supply of sites in the Borough. This respondent also stated that NBC should take into account the level of supply of sites in the Borough, because the current shortfall appears to not be a lack of sites, but less than optimum delivery of the sites which are available. The respondent expressed concern that by increasing the supply of sites, there would be more harm than benefits. This is because the supply of sites can dissipate. The respondent suggested that NBC should be more transparent about its supply of sites and be clear about what can be done to ensure that they come forward for development.

The same respondent referred to an appeal case in East Northamptonshire, where the appellant argued for a 20% buffer, citing a persistent under delivery of housing by the local planning authority. The Inspector did not agree with the appellant. The Inspector did not consider that the under performance in the intervening period could be solely attributed to under-delivery by the Council, and had more to do with the economic recession. Over the past 15 years, the Council demonstrated a commitment to achieving high levels of completions in the first 7 years and again in the past 2 years. The respondent concluded that 20% is not therefore considered to be an appropriate buffer because it refers to a period when the economic recession impacted on delivery which does not give a realistic indication of longer term delivery over the plan period.

One respondent (not duly made) stated that the existing vacant properties in town should be brought back into use first. Brownfield sites should be built over for 1 and 2 bedroom flats to deal with the homeless crisis and real need for properties.

Question 4: Do you agree with a residential density of 40 dwellings per hectare outside of the sustainable urban extensions, with higher densities in the town centre, other centres and along key transport corridors?

3.21 There were twenty respondents to question 4, of which one was not duly made.
Six of the respondents agreed to the suggested residential density, five respondents stated that they did not agree, one respondent had no comment and eight of the respondents (including the one “not duly made”) offered several comments.

A general comment made by five respondents was that regardless of whether they agree with the proposed residential density of 40 dwellings per hectare (dph), there is concern regarding lack of amenity and parking spaces within high density residential development. One of the respondents mentioned that all other policies should reflect the higher density, for instance the requirements for amenity space and parking. The respondent commented that high requirements for amenity space or parking provision are land hungry and will make achieving high density unviable.

Six respondents expressed their support for the proposed density but had the following conditions/ comments/ recommendations:

- The target of 40dph is supported as long as all the other policies reflect this target
- Each site should be judged on its own merits and densities should be a target as opposed to an absolute requirement
- Housing with this density should be for people with no children. High density housing with little or no provision for play and recreation can lead to higher than normal levels of antisocial behaviour as the children choose to play in inappropriate areas causing conflicts between neighbours
- As long as there is sufficient parking for all the cars
- Update the SHLAA, and explore all the reasonable options to provide land to accommodate new homes as well as employment and other uses to support growth
- Support a minimum density of 40dph for the residential schemes within the Borough and higher density requirement near key centres or transport corridors but SUEs should achieve an average 40 -45dph not 35dph in order to make the most efficient use of available land.

Five respondents disagreed with the proposed density of 40 dph and higher densities. Four respondents regardless of whether they agree with the proposed density do not support setting up a blanket figure of density.

One respondent stated that each site should be assessed or carefully master planned, taking into account of elements such as character/architecture/ the type of housing to be provided and location to ensure that it responds sensitively to its surrounding context.

One respondent stated that there are numerous adverse effects associated with the imposition of an over prescriptive planning policy of this nature. It was agreed that a policy of this nature could potentially be welcomed for centrally located sites that can accommodate high density residential schemes. However, in those other locations outside of the Central Area, a more pragmatic and flexible approach is required to inform housing density. The imposition of a plan wide density policy has the potential to negatively affect the quality of future developments and will result in the disproportionate delivery of smaller sized dwellings which may not meet local housing needs. This respondent was also concerned as to whether the stated density
requirement can actually be achieved when combined with the requirements of Technical Housing Standards and the recently adopted Northamptonshire Parking Standards. Such publications increase the development pressure. For instance, the County Council’s parking requirements have increased significantly which means that NBC will have to find additional land for housing due to the increased land requirements for parking. A prescriptive housing density policy would serve to overburden developers, add another barrier to housing growth and ultimately result in over developed sites. Officers were recommended to reconsider those policy provisions contained within the NPPF (particularly paras 47/ 59).

One respondent stated that each development should be judged on its own merits. Dwelling density may not always be the critical factor in determining the quantum of development. The respondent commented that in some urban areas and also around transport nodes, density could be in excess of 40 dph. However, in locations such as the rural-urban fringe, a lower density of around 30 dph would be more appropriate. This ensures that effective landscape buffers and other measures such as surface water attenuation can be incorporated.

Three respondents disagree with higher density, with two referring to ‘key transport corridors’ which can cause immediate traffic congestion and air pollution for those residents. It was pointed out that Northampton already has seven Air Quality Management Areas with high levels of NO₂ which are all located along key road links. One respondent mentioned that the town centre and Spring Boroughs should not have higher densities as there was enough high density one bedroom accommodation in the area, and what was needed was more affordable family housing with gardens. It was also mentioned that high density development would lead to an increase in social deprivation/ exclusion/ cohesion and crime which does not help achieve some of the key objectives of the Local Plan.

One respondent stated that raising density levels needs to be carefully considered. This should only occur where it is realistic, otherwise it simply results in an under provision of residential allocations.

One respondent commented that densities change the characteristics of developments. There is greater scope to increase densities where smaller units such as 1 and 2 beds and flats are provided, typically in town centre locations and along key transport corridors. Elsewhere, raising the density simply results in the reduction of the sizes of both the public and private spaces, to the detriment of the quality of the development and the potential health of its residents. In such scenarios, increasing densities would then have the potential to undermine objections 2 and 7 of the Local Plan Part 2. If larger number of dwellings share private driveways, then less land than would be required from public highways. This means the density can be increased without the need to reduce the level of associated green space.

One respondent commented that it will depend upon demand for housing, size of dwellings and residential growth in the region.

One respondent accepted that maximising the number of dwellings on additional sites outside of the SUE’s would help address the land supply issue but urged NBC to
identify further sites for residential development to ensure that all new development is sustainably delivered to both meet current and future needs.

One respondent suggested removing the word “also” from ‘The Strategy’ on page 8 to instead read “The historic environment will be central to shaping the Borough’s future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places.” The respondent also suggested making reference to heritage assets in order to strengthen ‘providing new homes’.

One respondent expressed surprise at the number of houses to be built on the Kingsthorpe middle school site. The respondent considered that having 190 houses on this site would result in high density and the comparison between this site and the adjacent area is extreme.

One respondent (not duly made) suggested that residential units should be built on brownfield sites in the town centre. This should be utilised / built on before building on the outskirts and on already designated SUEs. Harpole/Kislingbury/Bugbrooke housing estates should not be progressed as they are being built on prime green belt (for farming purposes only).

Question 5: In allocating sites for housing development, do you agree that we should give priority to sites that can be delivered in the short term?

3.22 There were twenty respondents to question 5, of which one was not duly made.

Ten of the respondents (including the one not duly made) agreed to the question, five respondents disagreed, two respondents had no comment and 3 of the respondents had their own opinions.

The general comment from those who agreed with the question is that priority should be given to sites which can be delivered in the short term in order to meet an immediate shortfall in requirement. There were some points raised by those respondents as follows:

A focus should be given to smaller sites which fit logically alongside a larger development scheme already delivering dwellings and supported by existing infrastructure such as schools, doctors and local shops. Providing the infrastructure such as schools, doctors and local shops prior to the delivery of the housing is considered to be important. This would provide the Council with a higher level of delivery certainty, rather than relying on much larger schemes, such as SUEs, which will make their contribution to supply in the medium and longer term.

One respondent suggested sites such as Buckton Fields at the Eastern Land Parcel should only be considered if it fits with the current housing demand in the region and does not compromise the quality and lifespan of the buildings. The respondent agreed with the question but was uncertain as to what is meant by prioritising.

Some respondents promoted their small sites for development which can be delivered in the short term. One respondent stated that their client’s sites are suitable for a range of housing options which would meet the needs of first time buyer’s right through to
those which are seeking more aspirational and executive style properties. It was stated that whilst it is accepted that it is the Local Authority’s intention to maximise housing delivery within the Borough, this should not be at the cost of providing the incorrect range of properties required by the market.

One respondent (not duly made) stated that NBC should focus on brownfield sites within the town centre, for instance, vacant office units above current retail units could be used for 1 and 2 bedroom flats. Local building firms should be awarded specific contracts. NBC should concentrate on the existing built environment before building any more new housing on known Green Belt areas.

Those who disagreed with the question had a variety of reasons and comments as follows:

It would compromise the quality of the development, for instance, loss of green belt, and also would leave brownfield sites in the town centre undeveloped, e.g. Chronicle & Echo, Greyfriars, which will be to the detriment of the Vision for a vibrant town centre.

It is necessary to allocate sites to ensure provision across the whole plan period and not just those that can be delivered quickly. If sites are not allocated for delivery across the whole plan period, the issue of being unable to demonstrate a Five Year Housing Land Supply will reoccur further into the Plan period. It may be that larger strategic sites can provide houses in the short term and then through the plan period.

NBC is heavily reliant on its housing numbers being achieved through the SUEs which in reality are likely to be delivered later on in the plan period and beyond.

Whilst the deliverability of a site should be a consideration for allocations, this should not override the consideration of the particular planning merits of individual sites and the contribution they will play in delivering the vision of the plan and the sustainable development of Northampton. The respondent’s site is considered able to achieve wider contributions as well as delivering housing, such as softer landscaped edge and opportunities for planning and other measures to support the Nature Improvement Area (NIA) and Green Infrastructure networks.

Other respondents who disagreed/ had additional comments state the following:

- One respondent suggested removing the word “also” from ‘The Strategy’ on page 8 to read “The historic environment will be central to shaping the Borough’s future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places.” The respondent suggested making reference to heritage assets in order to strengthen ‘providing new homes’
- One respondent promoted a particular site for development and explained the reasons why the site is suitable for housing development, including its suitability for development in the short term
- One respondent had encouraged NBC to produce a Housing Implementation Strategy in accordance with the NPPF to demonstrate how the 5 year land supply will be achieved and maintained, and was pleased that NBC has now
resolved to do so. It was advised that this is produced as quickly as possible and that it contains a series of robust actions to help bring forward supply

**Question 6: What other actions would help new homes to be built and completed more quickly on the identified sites for housing development?**

3.23 There were nineteen respondents to question 6, of which one was not duly made.

This question generated a mixed response:

- The largest delays are in securing planning permissions and completion of S106 agreements. A clear ‘buy-in’ from Planning Officers and Planning Committee Members to support sites allocated within the Local Plan is crucial to avoiding unnecessary delays. Proactive and forceful chasing of third party consultees is also important to reducing the time applications are delayed in the planning system. The use of Conditions should only be applied when absolutely necessary to avoid delays to starting on site. Where conditions are necessary the timing of these should be carefully considered and only be pre-commencement where essential.
- The Local Plan Part 2 must identify a range of sites, both within and adjoining the Borough boundary that are capable of being delivered in the shorter term. Clear guidance on infrastructure requirements as part of the plan is very welcomed as this would help minimise the requirement for negotiations with partners, such as Northamptonshire County Council, in respect of highway improvements and education provision.
- The Council has proposed that sites which are deliverable within 5 years should be prioritised as part of the Part 2 Local Plan. For all sites it would be helpful to consider to what extent new and improved water and wastewater infrastructure will be required and whether this will require the allocated site(s) to be phased.
- The Options Consultation document states that there is likely to be a shortfall of land to accommodate dwellings to meet identified future needs. The consequences of this are being addressed through proactive working with neighbouring authorities to try to share some of the housing delivery. The respondent looks forward to seeing how this will be reflected in the emerging Part 2 Plans for Daventry and South Northamptonshire.
- NBC should actively engage with developers and landowners of identified sites and work with partners to understand potential issues and barriers to sites coming forward and to find jointly agreed solutions.
- Allocation of sites through the plan process should be accelerated. Those sites which are genuinely deliverable in the shorter term should be given priority, and should be driven by the Council.
- The Local Plan Part 2 must identify a range of smaller sites within the Borough to deliver dwellings in the shorter term, to include sites which would have a lesser impact on infrastructure requirements, or sites which are already linked to wider infrastructure improvements. Those sites which are identified through the Plan should be considered as acceptable in principle, and treated as such through the determination process.
- Release of corporate land banks to allow for social housing.
The answer is to move forward quickly with the SHLAA. If further information concerning land availability is needed then owners and agents should be contacted and given a short time period to respond. The respondent's client’s site has been available for development for many years but has had to be put on hold pending a new local plan. This is a clear indication that there needs to be a fresh approach to development opportunities.

- Government funding for social housing is needed.
- Empty office blocks can be converted to apartments, and these are often near town centres eliminating the need for car ownership or car use.
- Clear appraisal of the infrastructure and services needed for each site be identified and written up long before development takes place.
- There should be flexibility in the application of policy requirements relating to the provision of affordable housing. In addition, flexibility should be applied to requirements to meet housing standards beyond building regulations in the short term to encourage delivery.

One respondent made three points namely: A discount on the Community Infrastructure Levy; production of realistic development briefs on key sites; and self-build allocations where infrastructure is provided up front.

One respondent commented that some particular types of property (e.g. timber framed) are quicker to build than traditional houses. Other types of innovative housing (pods) are being developed and further investigation is required. The type of housing to be built may be restricted by particular skills shortages within the construction industry which could also have an impact on labour build costs. The respondent's client’s developments are delivered through private funding, without the need for grant funding. The delivery of these homes within mixed tenure schemes can significantly improve deliverability and viability, with the added benefit of speeding up delivery as the model can be quickly occupied without the need to wait for external funding. To speed up housing delivery, it was recommended that the Plan recognises the benefits of this model and include clear reference to the tenure in its housing policies.

One respondent suggested removing the word “also” from ‘The Strategy’ on page 8 to instead read “The historic environment will also be central to shaping the Borough’s future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places.” The respondent also suggested making reference to heritage assets in order to strengthen ‘providing new homes’.

One respondent (not duly made) stated that a born and bred Northamptonian should be employed as a Senior Project Officer at NBC to take charge for specific new builds on brownfield sites first of all. The designated SUEs on the outskirts of town i.e. Hardingstone, Moulton, Collingtree, Upton and Harpole should be cancelled and ignored until brownfield Town Centre redevelopments have been completed. For lower costs, use local builders first. Build upwards not outwards. The respondent commented that University of Northampton sites should be kept as an academic institution in order to supply graduates for developing the local economy on a much greater scale.
Question 7: Do you agree that we should identify sites for specialist housing?

3.24 There were sixteen respondents to question 7, of which one was not duly made.

Eight of the respondents agreed with the question, two of the respondents disagreed, one respondent had no comment and five of the respondents including the one not duly made had their own opinion.

Those who agreed with the question mentioned the following:

- Considering the high demand for land, housing will probably not be provided if the issue was not being addressed by a policy specialist.
- If a developer proposes specialist housing in another location and this proposal is approved, an identified site could be released.
- The site for specialist housing should be identified for the types of housing where there is need evidenced and supported by the Council’s SHMA (this is mentioned by two respondents). This includes the provision of a mix of housing for “different groups in the community”. The West Northamptonshire Joint Core Strategy also identifies the need for all forms of housing to be provided for.
- Agree. However, the planning authority does not generally have the benefit of specialist expertise. It is therefore essential for the planning authority to engage with appropriate providers, land owners and consultants with the requisite expertise and knowledge.
- Housing provision for the elderly is important. The provision of secure specialist developments such as the 'extracare' village addresses the 'fear of crime' for many older people. Such development should have elements contained within it which allows use by other members of society so that the development is busy and vibrant but controlled.
- Whilst positively prepared policies in respect of specialist housing and the provision of housing for older people will go some distance in addressing those needs it is considered that such development could be assimilated into all proposed residential sites. However, as is the case with affordable housing, the respondent is aware of the management issues that arise from a 'pepper pot' approach to such developments.
- In the majority of cases, specialist needs are better met through those sites which are more centrally located or on those sites which offer residents high accessibility to shops, services, facilities and public transport. It is considered that as a consequence of allocating currently suitable residential sites to meet particular housing needs, the Council will have to identify further land to meet more general housing needs.
- Any proposed housing policies, for specialist properties or otherwise, should allow for the delivery of suitably flexible developments which are both sustainable and responsive to changing circumstances and individual needs over the life of the plan.

Two of the respondents who disagreed with the question gave the following reasons and suggestions:
Supportive policies for specialist housing are okay but the location of specialist housing should be flexible and identified by the providers of these units. Land should not be unnecessarily sterilised by an inappropriate allocation.

Specialist housing causes ‘ghettos’.

Those who did not specify whether they agreed with the question or not expressed their concerns and suggestions as follows:

- There is some merit in providing homes for the elderly in locations close to local services and transport routes, but even the allocation of specific sites for this purpose has the potential to stifle development through over-prescription of land uses.
- Market forces tend to direct the provision of all housing types, including specialist housing, and planning policy needs to respect this.
- A better approach would be the provision of sufficient land for housing purposes, including reserved sites so that land values are more realistic and delivery more consistent.

One respondent expressed disappointment that the section on housing provision makes no mention of Provision for Gypsies and Travellers. The respondent questioned the meaning of specialist housing.

One respondent suggested removing the word “also” from ‘The Strategy’ on page 8 to instead read “The historic environment will also be central to shaping the Borough’s future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places.” The respondent also suggested making reference to heritage assets in order to strengthen ‘providing new homes’.

One respondent (not duly made) recommended that the discontinued middle school sites be converted into 1 and 2 bedroom flats and major allotments. The respondent also referred to an Estate Leader role for growing on non-allotment sites within housing estates.

**Question 8: Do you agree that we should identify sites specifically for the provision of older persons housing?**

3.25 There were sixteen responses to question 8, of which one was not duly made.

Seven of the respondents agreed with the question, three of the respondents disagreed, one respondent had no comment and five of the respondents including the one not duly made had their own opinion.

The key messages were:

- No, it is a better community that integrates all ages.
- No, a community needs housing to be for all ages so that it can be a ‘community’.
- Yes. Needs to be affordable.
- "Pensioner only Villages" should be built within known existing housing estates and should not attract criminality, i.e. St James Lewis Court area. "Retirement Areas" should include access to allotments, to deal with increased levels of physical activity and to tutor youngsters in self-sufficiency. These pensioner only villages and retirement areas should be situated near Academies (not duly made).

Question 9: Should allocations for general housing include a proportion of smaller market dwellings (1 and 2 bed)?

3.26 There were eighteen responses question 9, of which one was not duly made.

This generated a mixed response, with seven respondents saying yes (including one not duly made), three respondents saying no and the others had either no comment or gave mixed opinions and alternative suggestions.

The respondents who said yes also mentioned:

- Must provide for the makeup of the UK population.
- There are too many four/five bedroomed houses with too little provision for parking.
- Yes to apartments.
- Not all concentrated in the town centre.

Many respondents who did not say yes to this question mentioned that the housing mix should be informed/identified by the most up to date evidence on housing need such as Strategic Housing Market Assessment. Some also suggested letting the market decide, for instance house builders, because they respond to market forces and build the houses most desired in order to maximise values. The alternative approach suggested is to include a policy which outlines a need to provide a mix of housing that largely reflects the identified needs of 'general housing' within the Borough/sub-area, based upon an up to date housing needs assessment. The housing needs assessment then should be periodically updated (one respondent suggested every 2 years) over the life of the plan.

Some respondents stated their concerns that the imposition of rigid expectations of house types and sizes on site allocations has the potential to be counterproductive. For instance, the changes to the Permitted Development Regulations in 2014 and April 2016 contributed to reducing the pressure on allocated sites to deliver smaller properties. Therefore it is urged that any policy carefully considers and accounts for the level of need for such dwellings to make sure that there is not an over-supply of 1 and 2 bed properties.

One respondent added that the Council also needs to consider the whole range of housing needs present within the Borough including those executive and aspirational needs which sit at the other end of the spectrum.

One respondent mentioned that proposals to increase densities within the town centres, other centres and along key transport corridors are likely to have the effect of increasing the provision of smaller market dwellings.
One respondent commented on affordable housing. A preferred mix for affordable housing could be considered but this must include a degree of flexibility to reflect the uncertainties around affordable housing provision and Central Government policy changes and site specific considerations.

One respondent expressed disappointment that the section on housing provision makes no mention of Provision for Gypsies and Travellers.

One respondent (not duly made) considered that specific allocations have to be made for 1 and 2 bed flat units within the town centre in order to increase housing density but with no car parking allowed. Local industry has to be within walking distance such as Victorian era shoe factories and workers housing. It was mentioned that several already exist but NBC has not considered them. This respondent suggested bringing back empty office units in St Michaels Road into use by entrepreneurial architects.

**Question 10: Should the plan specify a threshold or proportion of serviced plots to ensure the delivery of custom-build and self-build plots?**

3.27 There were fifteen responses to question 10, of which one was not duly made.

Four of the respondents agreed with the question, one respondent disagreed, two of the respondents had either no comment or no opinion and 8 gave mixed opinions and alternative suggestions (including not duly made).

One respondent who said yes to the question mentioned that it should be done through partnering with organisations such as Habitat for Humanity GB Homes which would enable local people to take some control of Housing Need.

One respondent stated that if a threshold or proportion of serviced plots are to be considered, this would need to come from the affordable housing provision and not the private housing provision. Further eroding of the level of private housing provided on a site via the introduction of such a provision would affect the viability of sites and would likely reduce the number of sites coming forward or lead to delays in negotiations through planning (due to viability negotiations on affordable housing provision and S106 payments).

Three respondents (regardless of whether they agree with the question or not) commented that any policy of this type should be evidenced and supported by the Council’s Strategic Housing Market Assessment. One said that it would not be an efficient use of resources to provide such plots without specific evidence and market demand to do so.

One respondent stated that it is potentially dependant on the skills in the region to undertake this type of development.

One respondent referred to the comment made by the Home Builders Federation (HBF) over such threshold policies for other Local Plans consultations. Their concern was that such an approach provides no additionality to land supply but rather changes production from one type of builder to another. It was also noted that there are practical
problems associated with implementing a restrictive/threshold policy including health and safety implications, working hours and length of build programmes. It was mentioned that one of the Inspector’s reports expressed reservations about the implementation difficulties associated with threshold approach. It is more appropriate to identify specific sites appropriate for self-build/custom build rather than seek a proportion of units on sites to be available for self-build/custom build.

Another respondent also referred to implementation difficulties. It was stated that if a threshold is proposed in the same way as affordable housing, this may cause difficulty in terms of implementation. Realistically, they can only be incorporated within the SUEs or on specifically designated sites, so that a design brief can be created for such schemes.

One respondent suggested removing the word “also” from ‘The Strategy’ on page 8 to instead read “The historic environment will be central to shaping the Borough’s future. Heritage assets in all their forms will be promoted and enhanced in supporting the delivery of distinctive places.” The respondent also suggested making reference to heritage assets in order to strengthen ‘providing new homes’.

One respondent (not duly made) stated that the threshold can be applied only for specific "Eco Friendly Builds" on edges of town. Other suggestions include:

- high density flats in current, existing Victorian era estates in the town centre
- no building within known SUE sites as they are currently "unfit for purpose" i.e. flood sites and SSSI positions
- modified large static caravans which can be initiated into other County based "caravan sites" i.e. Wilby, Blisworth, Cosgrove and Billing Aquadrome built by the Earls Barton Caravan firm - local builder gets the business.

**Question 11: Do you agree that there is demand for more small scale office space, especially in the town centre?**

3.28 There were eleven responses to question 11, of which one was not duly made.

This generated a mixed response, with some respondents saying that there is no demand for small scale offices and others saying that there is, particularly from Small or Medium sized Enterprises (SMEs). There is consensus that with flexible working conditions and online businesses, the need for employment spaces and sizes needs to reflect demand. Another comment was that underused or vacant properties in the town centre could be refurbished for office use if there is evidence of demand. One comment highlighted the importance of an up-to-date evidence base to address this question.

One respondent (not duly made) considered that start-up businesses, particularly in the information technology/ creative arts/ media, should be given more assistance including potentially reducing business rates. Also, the respondent suggested using compulsory purchase orders to purchase properties to help these businesses set up their operations under the right terms. The respondent added that all start-ups will need serious help from NEP/ SEMLEP/ Town Centre BID.
3.29 There were eleven respondents to question 12, of which one was not duly made.

Most agreed that dated, low value office stock in the town centre is oversupplied and one commented that there are prime examples available of such units, including Belgrave House. Further emphasis was placed on providing an updated evidence base to support investors in Northampton who are looking to redevelop brownfield land, better utilise vacant office for alternative uses, and to support those looking for the right format of office accommodation.

One respondent (not duly made) was concerned that conversion costs would put people off, particularly from the IT/creative arts/media start-ups. It was recommended that the office units be updated with modern technology and aimed primarily at high tech and creative arts occupancy. The respondent also considered that apprentices should be taken on by all new businesses.

3.30 There were eleven responses to question 13, of which one was not duly made.

Four of the respondents agreed that outside the town centre, some medium and larger office allocations should be released to provide small or medium sized industrial and distribution uses to help meet demand, with one specifying that this should be the case if there is demand in place. At least two respondents state that these should be refurbished to provide living accommodation. Another stated that conflicts of use should be avoided. One respondent mentioned that the Local Plan should be planning to meet the identified needs for employment space in a flexible manner and emphasised the need for a robust evidence base. Another respondent (not duly made) stated that there are enough empty offices in the town centre and the Lakes, and that no new buildings should be developed until the existing buildings are fully utilised. The same respondent commented that high business rates are putting off start-ups.

3.31 There were fifteen respondents to question 14, of which one was not duly made.

Six of the respondents agree that 12 months should be sufficient for active marketing to be undertaken. At least three respondents did not consider the timescale to be relevant because of a variety of reasons including:

A fluctuating market (whatever pertains today may not be so in 12 – 24 months).
Each case needs to be considered on its merit and the community should be involved in deciding how long the marketing should be.

Placing a long time limit for marketing is considered to be an inefficient use of land given the conflicting pressures and limited land availability.

Another respondent considers marketing to be a waste of money. One respondent considers three months as a maximum would be an appropriate timescale although this itself could be onerous, depending on the operating conditions for many businesses.

One respondent (not duly made) commented that the marketing exercise should begin with the “date of leaving”. The respondent also stated that the marketing team should concentrate on creating businesses within academies and getting the under 25s involved in apprenticeships. In addition, private sector standards should be applied throughout the town.

**Question 15: Do you agree that we should allow more flexibility in some smaller centres for other uses to be introduced?**

There were thirteen responses to question 15, with one not duly made.

Nine respondents agree that more flexibility should be allowed in some smaller centres. One commented that this was necessary to ensure that the centres remain viable. Another highlighted the need for childcare provision including day nurseries and pre-schools as some of the uses which should be allowed in these centres. One respondent did not want the introduction of industrial uses in these centres and sought careful consideration to be given to retail use (for example, fish and chip shops).

One respondent wanted an explanatory text to be written for heritage assets. The respondent added that they form a vital and central role within town centres and allowing more flexibility could be a sustainable method for the continued use of smaller centres. The proviso is that in allowing this flexibility, it should still conserve and enhance heritage assets and their settings.

One respondent referred to multi purpose/ multi usage which can be managed through better timetabling. Planning can be involved with preferably one person in overall control, but no politicians. The respondent considered that there should be more flexibility within market sectors, led by private sector bodies who can react faster than public sector bodies.

**Question 16: Do you agree that we should review the secondary frontages policy, which restricts non-retail uses in some sections of frontage, to allow greater flexibility for non-retail uses in some areas?**

There were fifteen respondents to question 16, of which one was not duly made.

Eight of the respondents agreed that the policy on secondary frontages should be reviewed, to allow greater flexibility for non-retail uses.
However, one of the respondents considers that the review should be extended to primary retail frontages including the designation affecting Market Walk Shopping Centre. The respondent provided some evidence which suggests that the primary retail frontage policy has proven to be a significant barrier to securing full occupancy of Market Walk. It was also suggested that the Central Area Action Plan policy on the Market Square could be enhanced by acknowledging the area as a leisure destination and allowing greater flexibility for restaurant uses at Market Walk.

Another respondent states that there should be flexibility to allow childcare provision (including day nurseries and pre-school) within these frontages.

One respondent mentioned that Northampton could compete with Milton Keynes and Rushden Lakes if it was a destination of specialist shopping backed by Grade A department stores with an “emporium approach”. The respondent states that Northampton town could be stunning and with better marketing – using advice from national agencies - would go a long way. It was suggested that cleaning up the centre, encouraging a more brand diverse centre and changing the night time economy would improve the town centre.

One respondent was concerned that the increased flexibility of secondary retail frontages should not be at the expense of primary shopping frontages. The respondent considers that these too need more flexibility. The respondent wanted more information on which non-retail uses the Options question 16 was referring to. It was suggested that the primary frontages should be looked at first before addressing secondary frontages. There is a need to consider whether retail designations are accurate and whether they are likely to be consolidated as online growth continues and high streets become more service driven. The respondent also referred to the evolution of the high street.

One respondent did not understand the question and sought clarification on this.

One respondent (not duly made) made reference to hi tech businesses above retail outlets and to live-above shop properties of C19th and C20th. The respondent also mentioned that no car parking should be allowed and that people should live within the town centre to increase footfall for all retail outlets. The same respondent recommended that a team should be in total control of the whole process of finding the empty units and filling them in the right way with possible modification where necessary. The respondent suggested that NBC should be the key point of reference. This should be set to dominate the town in future development (next 10-20 years).

Question 17: Do you think that within the town centre, some of the medium and larger sized office allocations are oversupplied?

3.34 There were twelve respondents to question 17, of which one was not duly made.

Four respondents agreed that within the town centre, some of the medium and larger sized office allocations are oversupplied. Two respondents consider this to be the case but referred to the need for a robust and updated evidence base. One mentioned that they need to be used for flats or apartments. Another wanted heritage assets to
be included in the explanatory text. Only one respondent was unsure if these office allocations are oversupplied.

One respondent (not duly made) commented that Belgrave House can have open plan offices for hi tech and creative arts/media companies but not big office units. There are numerous empty units for start-ups but business rates are far too high. The era of longer based companies within the town centre is over. NBC has to concentrate on SMEs and entrepreneurs. IT apprentices and trainers have to be based within Belgrave House and tackle the massive IT skills crisis.

**Question 18: Are there any other Development Management policies that you think should be included in the Northampton Local Plan Part 2?**

3.35 There were twenty one respondents to question 18.

One respondent welcomed all the suggested policies but overall it generated a mixed response depending on the professional/personal interest of the individual responding to the consultation. The responses can be broadly divided into topics and have been summarised below.

**Process of Plan Making**

Four respondents made comments on this topic. Two expressed concern about the level of information provided by the Options Consultation Paper. One went on to say that without proposals maps, it was not possible to comprehensively respond. The other highlighted the importance of an evidence base to the preparation of a Local Plan. The respondent said, in the context of the Options Paper, that reference to an evidence base was unclear and it would be helpful to make its location clearer.

A third respondent highlighted the importance of cross boundary working where environmental risks and opportunities are best considered at a 'larger than local' scale e.g. River Nene Nature Improvement Area; Flood Risk Sequential Test; River Basin Management. The final respondent stipulated that the Plan should be a relevant and proactive policy document; one that is responsive to the change in lifestyles since the 1997 Adopted Local Plan. It should have flexibility of attitude and simplicity of policy.

**Travel and Transport**

Five observations were made in relation to travel and transport. Two were concerned with the impact that the level of proposed growth would have on the Strategic Road Network. It was noted that any potential impacts should be considered as part of the development management process through Transport Statements or Transport Assessments. Particular reference was made to the effect growth could have on the operation of the M1 junctions. 2 respondents observed that the Greyfriars site should be the Town’s bus station.

The final respondent outlined some existing traffic and social problems faced in the Horsley Road area. They highlighted the problem with vehicles (large and small) entering and exiting Horsley Road and Balmoral Road. Also, Kingsthorpe has two lanes each way, and vehicles are turning right across fast moving traffic (both directions). Finally, the bus stop opposite Horsley Road had been demolished in an
accident. This problem they noted could be remedied by extending the central barrier from Barrack Road to Thornton Road junction.

**Housing**

Five respondents made observations around housing issues. The assurance through the Options Paper that the Plan would explore reasonable options to provide land to accommodate new homes, employment and other uses supporting growth was supported. There was also support for proposals to set a minimum residential density for Northampton Borough.

One respondent sought clarity on the Brownfield Register and Permission in Principle asking how this will sit alongside the Local Plan Part 2 and the housing allocations it makes. Another requested more clarity through the Local Plan Part 2 on a local affordable housing requirement, something more detailed than currently offered through the Joint Core Strategy.

The final respondent was also concerned with affordable housing issues. They wanted a clear policy on affordable housing that sets out the Council's ambition to meet local housing needs, and also local aspirations for affordable home ownership. This, they noted, should include clear reference to Rent to Buy as this is expected to be included in changes to the NPPF and PPG later this year.

**Heritage**

Four observations were made in relation to heritage. The first strongly welcomed the inclusion of heritage assets. Another suggested that heritage assets should be taken into account throughout relevant plan policies. A third recommended that 'Development within and in close proximity to Conservation Areas' would be more effectively titled 'Development within and affecting the setting of Conservation Areas'. Finally one advised that policies relating to Battlefields and Non-designated heritage assets should also be included.

**Water**

Five observations were made in relation to water issues, two of which supported the principle of the optional water efficiency standard being applied to both residential and non-residential developments. Another highlighted the scope for a policy on river ecosystem protection, preservation and restoration.

One respondent advised that it's not necessary to duplicate the requirements of the Joint Core Strategy Policy BN7A in the Local Plan Part 2. They went on to say that it would be helpful to consider whether there are any specific development criteria for the proposed allocation sites (once identified) that would relate to water and water recycling infrastructure. Finally it was noted that policies and Plan text would need to be updated once the Water Cycle Study and Strategic Flood Risk Assessment has been refreshed.

**Open Space, Sport, Recreation, Health and Wellbeing**

There were 4 responses that related to open space, sport, recreation, health and wellbeing. The first commented that Development Management policies should be developed to enable the delivery of the actions / outcomes of the Open Space, Sport and Recreation Strategy. Another welcomed the inclusion of polices that related to
the natural environment. One requested a policy on play space having noted the shortage of this provision in earlier comments on the Option Paper. Finally it was suggested that the inclusion of a health and wellbeing development management policy would help ensure (in a more structured and rigorous way) that new developments are taking advantage of opportunities to support and promote wellbeing and prevent ill health.
4 SITES CONSULTATION

Purpose of Consultation

4.1 The Sites Consultation took place between 2nd October and 13th November 2017. The purpose of this consultation exercise was to gather views on which sites would be appropriate for development, which sites would be least appropriate and which sites should be protected. The consultation document listed sites which were considered appropriate for residential or commercial development, and these include sites which were submitted to the Council by landowners and developers, and Council owned sites. It was considered important for all options to be explored. It was clarified that the Council had not, at this stage, taken a formal view on any of the sites. Their inclusion in the consultation document did not necessarily mean that they would be considered for development. Any views expressed at this stage would be taken into consideration when determining the potential future uses of sites and their potential for inclusion in the Submission Draft Local Plan Part 2 for development allocation.

Consultation Strategy

4.2 Table 9 details the consultation actions as agreed at Cabinet on 13th September 2017.

Table 9 – Agreed consultation actions – Local Plan Part 2 - Sites Consultation

<table>
<thead>
<tr>
<th>Timing</th>
<th>Actions</th>
</tr>
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<tbody>
<tr>
<td>September 2017 (before consultation)</td>
<td>Local Plan Part 2 newsletter for all Borough Councillors to provide briefing on the Sites Consultation including overview of content, consultation actions and timetable.</td>
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<tr>
<td></td>
<td>Two press releases:</td>
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<td></td>
<td>• One just prior to the Cabinet papers being made public, around 4th September prior to dispatch on 5th September</td>
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<tr>
<td></td>
<td>• One just prior to the start of consultation</td>
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<td></td>
<td>Social media communications on the Council’s Twitter and Facebook</td>
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<tr>
<td>2nd October – 13th November 2017 (during consultation)</td>
<td>All consultation documents to be made available at the One Stop Shop at the Guildhall - staff available to answer questions/ provide advice</td>
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<tr>
<td></td>
<td>All consultation documents to be made available at Libraries in the Borough</td>
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<tr>
<td></td>
<td>All consultation documents to be made available for review / download with on-line response facility available on the NBC website</td>
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<tr>
<td></td>
<td>Letters or emails explaining the consultation and providing details of how to respond sent to specific consultation</td>
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bodies\(^1\), the general consultation bodies\(^2\), neighbouring authorities, prescribed bodies\(^3\) and other organisations and individuals as appropriate.

<table>
<thead>
<tr>
<th>Paper copies of consultation documents to be made available at Parish Council offices and other community offices where appropriate</th>
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<tr>
<td>Paper copies of consultation documents to be made available on request</td>
</tr>
<tr>
<td>Consultation briefing for all Borough Councillors</td>
</tr>
<tr>
<td>Consultation briefing for all Parish Councils and Neighbourhood Forums in Northampton Borough</td>
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<tr>
<td>Discussion as appropriate with key organisations including statutory bodies and adjoining local planning authorities</td>
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<tr>
<td>Public notice placed in the Northampton Chronicle &amp; Echo</td>
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### Outcome of Consultation

#### 4.3
530 separate responses were received from 54 organisations/ individuals. A report on the comments received and the officer responses to those comments can be viewed via this link: [https://www.northampton.gov.uk/info/200205/planning-for-the-future/2324/northampton-local-plan-part-2---sites-consultation](https://www.northampton.gov.uk/info/200205/planning-for-the-future/2324/northampton-local-plan-part-2---sites-consultation). Please see “Sites Consultation Comments and Officer Responses”.

#### 4.4
These responses can be separated into the following:

- There were responses, mainly from statutory undertakers, asking to be consulted on specific sites should they be taken forward / through the planning application process.
- Responses were also received from landowners and developers supporting the proposal to investigate their sites further for possible allocations, and some provided additional evidence base in support of their proposed development.
- Objections were received from some respondents who were concerned about certain sites being promoted for development and the potential losses associated primarily with greenspaces and community facilities.
- Concerns were expressed about the impacts of the developments particularly on traffic and pollution.

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\(^1\) The specific consultation bodies are listed in Regulation 2 of the Town and Country Planning (Local Planning)(England) Regulations 2012 and relate to organisations responsible for services and utilities and infrastructure provision.

\(^2\) The general consultation bodies are also specified in Regulation 2 of the 2012 Regulations and comprise:

- a. voluntary bodies some or all of whose activities benefit any part of the local planning authority’s area
- b. bodies which represent the interests of different racial, ethnic or national groups in the local authority’s area/ different religious groups in the local planning authority’s area/ disabled people in the local planning authority’s area/ persons carrying on business in the local planning authority’s area

\(^3\) The prescribed bodies are specified in Regulation 4 of the 2012 Regulations (as amended) and in the case of Northampton include Environment Agency, Historic England, Natural England, Civil Aviation Authority, Homes and Communities Agency, NHS, Office of Rail Regulation, Highways England, Northamptonshire County Council Highways, South East Midlands Local Enterprise Partnership, Northamptonshire Local Nature Partnership.
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tr>
<td>AQMA</td>
<td>Air Quality Management Areas</td>
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<tr>
<td>BID</td>
<td>Business Improvement District</td>
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<tr>
<td>CAAP</td>
<td>Central Area Action Plan</td>
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<tr>
<td>CIL</td>
<td>Community Infrastructure Levy</td>
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<tr>
<td>DPD</td>
<td>Development Plan Document</td>
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<tr>
<td>EZ</td>
<td>Enterprise Zone (Northampton Waterside)</td>
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<td>GI</td>
<td>Green Infrastructure</td>
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<td>HMO</td>
<td>Houses in Multiple Occupation</td>
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<td>IDP</td>
<td>Infrastructure Delivery Plan</td>
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<td>Interim Planning Policy Guidance</td>
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<td>Interim Planning Policy Statement</td>
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<td>Land Availability Assessment</td>
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<td>Northampton Local Plan Part 2</td>
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<td>Northamptonshire County Council</td>
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<td>WNJPU</td>
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APPENDIX A
MEDIA RELEASES

Release

Date: 25 April 2016
Status: For immediate release

Have your say on Northampton’s Local Plan
Members of the public are being asked to have their say on Northampton’s next Local Plan – the long-term strategy for what, where, when and how development will be managed in the borough.
The Local Plan for Northampton will provide detailed planning policies and identify areas for development as well as areas that should be protected from development.

The Borough Council is reviewing the current Local Plan and would like the public’s views on the key issues they think the next plan should address. This could include issues as varied as delivering the right homes to meet people’s needs, considering the infrastructure needed to support growth across the borough, making better use of the opportunities of the riverside or protecting and enhancing the natural and historic environment and landscape.

The council is also reviewing its statement of community involvement which sets out how the public are consulted on planning applications and the Local Plan.

Councillor Tim Hadland, cabinet member for regeneration, enterprise and planning, said: “I would actively encourage as many people as possible to take a few minutes to have a look at the papers on our website and have their say. If you live, work or visit Northampton it will have an impact on you.”

The first stage of the Local Plan consultation is an issues paper which is now available to view on the Borough Council’s website at: www.northampton.gov.uk/localplanissues

Information is also available from the Guildhall One Stop Shop and local libraries, by phoning the planning policy team on 01604 837326 or emailing planningpolicy@northampton.gov.uk

The deadline for responses is 5pm on Friday 10 June.

ENDS

Please note media releases sent through our system are distributed through a remote email server which is not monitored. Please contact communications@northampton.gov.uk or call 01604 837777 with any enquiries for more information.
Still time to have your say on Northampton’s Local Plan

Members of the public are being reminded to have their say on Northampton’s next Local Plan before the deadline passes on Friday 10 June.

The Local Plan is the long-term strategy for what, where, when and how development will be managed in the borough. It also provides detailed planning policies and identifies areas for development as well as areas that should be protected from development.

The Borough Council is reviewing the current Local Plan and would like the public’s views on the key issues they think the next plan should address. This could include issues as varied as delivering the right homes to meet people’s needs, considering the infrastructure needed to support growth across the borough, making better use of the opportunities of the riverside or protecting and enhancing the natural and historic environment and landscape. Alongside this, the council is identifying potential sources of land for development within the borough – a call for sites is asking people to suggest sites that they consider would be suitable.

The council is also reviewing its statement of community involvement which sets out how the public are consulted on planning applications and the Local Plan.

Councillor Tim Hadland, cabinet member for regeneration, enterprise and planning, said: “We are nearing the end of the consultation period and I would urge people to take the time to have their say as it impacts everyone who lives, works or visits the borough.”

The first stage of the Local Plan consultation is an issues paper which is now available to view on the Borough Council’s website at: www.northampton.gov.uk/localplanissues

Information is also available from the Guildhall One Stop Shop and local libraries, by phoning the planning policy team on 01604 837326 or emailing planningpolicy@northampton.gov.uk

The deadline for responses is 5pm on Friday 10 June.

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PUBLIC NOTICE
NORTHAMPTON CHRONICLE & ECHO THURSDAY, 21 SEPTEMBER 2017

NORTHAMPTON BOROUGH COUNCIL
NOTICE OF THE NORTHAMPTON LOCAL PLAN (PART 2) SITES CONSULTATION

The Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Planning) (England) Regulations 2012

In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, notice is hereby given that Northampton Borough Council is consulting on its Local Plan (Part 2) Sites Consultation document, as part of the preparation of the Northampton Local Plan Part 2.

The Northampton Local Plan Part 2 will guide and respond to future development proposals across the Borough to 2029. The Plan must be in conformity with the West Northamptonshire Joint Core Strategy Local Plan Part 1. The Local Plan Part 2 will provide detailed policies on managing development and will address the supply of sites within Northampton to deliver new homes, maintain and expand employment opportunities, enhance the town centre and protect Northampton's heritage and natural environment.

The purpose of this consultation is to gather views on the potential future uses of sites to deliver the strategy and development required in Part 1 of the Local Plan.

Copies of the consultation papers can be viewed at the Guildhall’s One Stop Shop, local libraries and parish council offices in Northampton during their normal office hours. They can also be viewed on the Council's website by accessing the following link:

www.northampton.gov.uk/lp2sitesconsultation

The consultation period runs from Monday 2 October 2017 to 5pm on Monday 13 November 2017. Comments can be made by:

- using the Council’s online response system
- email to planningpolicy@northampton.gov.uk or
- in writing to the Northampton Local Plan Part 2 Sites Consultation, Planning Policy, Regeneration Enterprise and Planning Directorate, Northampton Borough Council, The Guildhall, St Giles Square, Northampton, NN1 1DE

Responses must be submitted by 5pm on Monday 13 November 2017.
APPENDIX B
EXAMPLES OF PUBLICITY MATERIAL

Northampton Local Plan (Part 2) and Partial Review of the Central Area Action Plan

THE PLANNING POLICY TEAM WILL BE ABLE TO ANSWER QUESTIONS ABOUT THE CONSULTATION TODAY BETWEEN 12.30PM AND 5PM.

DO COME ALONG AND SPEAK TO US! WE WILL BE LOCATED IN THE PLANNING AREA.

SEE HOW YOU CAN HAVE YOUR SAY ON THE NEW LOCAL PLAN!
Tell us what you think

The Local Plan is the long-term strategy for what, where, when and how development will be managed in the Borough.

You have a chance to shape the future of your town.

Let us know your views by Wednesday, 2 November 2016.

Northampton.gov.uk/localplan
NORTHAMPTON LOCAL PLAN OPTIONS CONSULTATION

The Local Plan – our vision for 2029

What is the Local Plan?
The Local Plan is the long-term strategy for what, where, when and how development will be managed in the Borough.

What is the vision for 2029?
The Plan sets out a vision for how the Borough can plan for sustainable growth over the next 15 years. It sets out a vision that will:
- Provide new homes
- Encourage new employment
- Create a vibrant town centre
- Celebrate our heritage

What is my role?
The initial consultation ran from April to June this year. The feedback we collected has helped to define our vision for 2029.

There will be several more opportunities to have your say over the coming months.

What are the next steps?
This is a further opportunity for you to have your say on the emerging Local Plan. You have until Wednesday, 2 November 2016 to submit a response.

How do I give my view and find out more?
Northampton.gov.uk/localplan
planningpolicy@northampton.gov.uk
Visit the Guildhall One Stop Shop or your local library
01604 837226
Background

The current Northampton Local Plan dates from 1997 and needs updating. The Council is preparing a new Plan to effectively guide future development in the Borough and to reflect recent Government policy.

Some of the policies included in the Central Area Action Plan (2013) also need to be reviewed in the light of recent development and changes to legislation, and these will be looked at as work gets underway.

We will be able to streamline the Local Plan by incorporating other documents into the Plan, including the Affordable Housing and Houses in Multiple Occupation interim planning policy statements.

The Plan will form the basis for planning decisions in the Borough.

The story so far

Between April and June 2016 we held a consultation on the scope of the Plan, and what it should cover.

We suggested that the Plan include:
- Site specific allocations to deliver housing provision, support employment and the local economy
- Identifying and putting in place the infrastructure which will be needed to support the planned growth of the town
- Policies to protect and improve Northampton’s natural, built and historic environment
- Policies to address sustainable development and climate change
- Policies and guidance to manage development and to determine planning applications

We also intend to produce a map to easily identify how different parts of the Borough will be affected by the policies in the Plan.

At the same time as that consultation, we invited comments on the following:
- The scoping report for the Sustainability Appraisal, the document which will be prepared to look at the economic, environmental and social effects of the Plan
- The draft Statement of Community Involvement, which sets out the Council’s strategy for involving the community in the planning process
- The methodology for the Land Availability Assessment, to help us identify sites that may be suitable and available for future development. We also invited land owners, developers and other interested parties to suggest sites for us to consider

In early May, all Borough Councillors, Parish Councils and Neighbourhood Forums were invited to workshops to discuss the Local Plan and issues identified in the consultation.

The issues that were discussed included:
- Housing for families and older people
- The cost of housing
- Prioritisation of brownfield sites
- Houses in Multiple Occupation
- Transport links from Sustainable Urban Extensions (areas of planned expansion which contribute to sustainable patterns of development with well-planned infrastructure, developed at appropriate densities) to the town centre
- Cycle routes, footpaths and green corridors (promoting environmentally sustainable forms of transport within urban areas, and acting as vital linkages for wildlife)
- Broadband capacity
- The housing adjacent to Moulton Park industry
- Protection for small industrial units around the town

What are we consulting on?

Between 21 September and 2 November 2016 we will be inviting comments on the “Options” stage of the Plan. This focuses in more detail on some of the key issues and sets out:

- Our Vision for Northampton in 2029
- The strategy to underpin future development and regeneration
- Key challenges which the Plan will need to address
- How the Council can plan positively for new homes and jobs while protecting and enhancing the Borough's natural and historic environment

We will also be inviting comments on the Sustainability Appraisal, looking at the economic, environmental and social effects of the Plan.

How can people take part?

The “Options” paper, the Sustainability Appraisal and all other consultation documents can be viewed online at northampton.gov.uk/localplan. Paper copies will be available for inspection at the One Stop Shop at the Guildhall, and at all libraries in the Borough.

Comments are invited online through a link on the above page, by email or letter.

What happens next?

Responses will be reported to the Council’s Cabinet Advisory Group, which advises on the preparation of the Northampton Local Plan (Part 2).

They will also be reported in summary to the Council’s Cabinet. The Council will use the comments and suggestions it receives to help to inform the draft Plan for publication and further consultation in spring 2017.